



November 12, 2008

The Restore Mt. Hood Coalition:

American Hiking Society

American Rivers

American Whitewater

Audubon Society of Portland

Bark

Center for Biological Diversity

Columbia Gorge Institute

Cycle Wild

Friends of Mt. Hood

Gifford Pinchot Task Force

International Mountain Biking Society

Oregon Chapter Sierra Club

Hood River Valley Residents Committee

Lower Columbia Canoe Club

Mazamas

Northwest Environmental Defense Center

Oregon Council Trout Unlimited

Oregon Kayak and Canoe Club

Oregon Mountain Biking Association

Oregon Trout

Oregon Wild

Pacific Rivers Council

Portland United Mountain Pedalers

Winter Wildlands Alliance

Jennie O'Connor-Card
Mt. Hood National Forest
6780 Highway 35
Parkdale, Oregon 97041

Dear Jennie O'Connor-Card,

Please accept these comments from the Restore Mt. Hood Coalition (Coalition) in response to the August 2008 OHV Plan update letter and consider these comments in developing the alternatives for the Environmental Impact Statement. The Coalition commends the Forest Service for recognizing the importance of controlling OHV abuse in Mt. Hood National Forest (MHNH) – all Americans have the right to enjoy our public forests, but no one has the right to destroy them or to ruin the experience of other forest visitors.

The Restore Mt. Hood Coalition represents recreation and conservation organizations committed to promoting and preserving Mt. Hood National Forest's world-class recreation opportunities and healthy ecosystems. We believe that a Mt. Hood Travel Plan should provide a framework for all users and not just OHV riders. The result will be a stronger Mt. Hood recreational community, a more robust recreation infrastructure, improved relations with adjacent landowners and communities, and healthier ecosystems.

The changes in the OHV route designation are problematic because the public will not know the route changes until the Environmental Impact Statement is released, and with usual snow levels, it may not be possible for the Coalition or other members of the public to visit the routes or areas and provide substantive comments. This is a step backward in the Forest Service's attempt to be transparent and up-front with the public regarding what routes they will consider for motorized vehicle use.

We would also like to address the following issues raised in the OHV Plan update letter:

SCOPE:

The regulations (36 CFR 212,251,261, and 295) clearly state that the Forest Service should address "all motorized travel" and identify the "minimum road system" necessary. *Emphasis added.* In order for the true intent of travel planning to be realized, the Forest Service must address off-road user needs *simultaneously* with the needs of quiet recreationists, other forest

visitors, and the ecosystem impacts of the various modes and conditions of travel throughout the forest.

Quiet recreation:

The Coalition has been working diligently with the Forest Service to provide greater attention to the needs of the recreation community at large. It is disappointing for us to see the Forest Service considering additional routes and potentially new areas for motorized recreation. As it appears to the Coalition, the only recreation planning currently going on in the forest is the Recreation Facility Analysis which is proposing closing facilities or having them run by concessionaires. If this process is indicative of the budget crunch the Forest Service finds itself in when it comes to recreation planning, the OHV Plan is putting limited resources towards something that benefits the only the smallest segment of recreational users. The OHV Plan further marginalizes the needs of all other recreation users, which make up the majority of the five million recreation visits to Mt. Hood National Forest receives each year. Not only is motorized recreation incompatible with most forms of other recreation, it is by far the most damaging to the ecosystem.

Enforcement

Since current enforcement capacity consists of four full-time patrol officers for Mt. Hood National Forest, we do not feel it is appropriate to consider alternatives that would further rely on non-existent enforcement to be effective. While the Coalition is aware there is grant money to help with enforcement, we do not feel this is a reliable enough source to count on in the long-term. Multiple Forest Service documents raise concerns associated with the extensive road network (~3,464 miles), including the need for greater road closures, decommissions, and maintenance. Without effective enforcement, OHV riders will continue to create new trails and re-open roads that have been decommissioned. Adding new routes to the system will surely expand enforcement and maintenance requirements.

Funding

While the Forest Service continues to struggle with funding, enlarging the OHV Plan does not make sense. Allowing more routes and areas requires the Forest Service to spend additional funds on fire planning, resource protection and mitigation, and enforcement. Such a large investment ignores current and future funding projections. Moving forward with an OHV Plan without a comprehensive plan for the whole road system will only continue to compound the maintenance and other associated costs of the deteriorating road system.

Dispersed camping

In the update letter, the reasons for eliminating dispersed camping from the OHV Plan process were, “the initial scoping for this proposal demonstrated that combining the designation of OHV routes and the designation of motorized access to dispersed camping corridors was confusing to the public and complicated the planning process.” While it may be difficult,

every other national forest in Oregon is dealing with OHV and dispersed camping designation together. If dispersed camping is not dealt with as part of this process, when and how does the Forest Service plan on dealing with this issue? Without more information, the Coalition sees this is another example of the Forest Service not effectively dealing with cumulative issues. Furthermore, if the Forest Service feels that dispersed camping was not understood by the public, it underlies the need for the Forest Service to do a more thorough job on its public involvement process for this plan and may also highlight the importance of addressing this issue now rather than later.

Conclusion

As we asserted in our scoping comments, by broadening the scope of the OHV Plan to be more consistent with the intent of the November 2005 Travel Management Rule, the Forest Service, the Coalition, and other stakeholders can work together to create a long-term and sustainable vision for Mt. Hood National Forest that results in a stronger Mt. Hood recreational community, a more robust recreation infrastructure, improved relations with adjacent landowners and communities, and healthier ecosystems. Instead, the Forest Service has not complied with the 2005 Travel Management Rule, marginalized the vast majority of recreation users, and failed to provide a new vision for travel and recreation on Mt. Hood National Forest.

We hope the Forest Service will consider the following measures as a way to improve public involvement when the EIS is released. First, the Coalition requests at least a 90 day comment period to analyze and respond to the changes. Second, we request that at least one open house is held in Portland. Thank you for your attention to these concerns.

Sincerely,

The Restore Mt. Hood Coalition