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**APPEAL TO THE REGIONAL FORESTER  
 OF THE UNITED STATES FOREST SERVICE  
 REGION 6**

BARK,	)
	)
	) <u>36 CFR § 215 Appeal</u>
APPELLANT	) In Re: Appeal of the Decision
	) Notice and Environmental
	) Assessment for the Zigzag Road
	) Decommissioning for Habitat
	) Restoration, Increment 2
	)
	)
	)
	)
MARY WAGNER, REGIONAL FORESTER,	)
Deciding Officer	)
or	)
GARY LARSEN, FOREST SUPERVISOR	)
	)

**APPELLANT’S NOTICE OF APPEAL, REQUESTED RELIEF, AND STATEMENT OF REASONS**

Dated this 20<sup>th</sup> day of May, 2010

**NOTICE OF APPEAL**

To: Appeal Deciding Officer  
 Mary Wagner, Regional Forester  
 US Forest Service - Pacific Northwest Region  
 333 SW First Avenue  
 Portland, Oregon 97204-3440

or

Appeal Deciding Officer  
Gary Larsen  
Mt. Hood National Forest Headquarters  
16400 Champion Way  
Sandy, Oregon 97055

Dear Ms. Wagner and Mr. Larsen,

In accordance with 36 CFR 215, Bark hereby appeals the Environmental Assessment (“EA”) and Decision Notice (“DN” or “Decision”) for the Zigzag Road Decommissioning for Habitat Restoration, Increment 2 (“Zigzag Decommissioning”) signed by Mt. Hood National Forest (“MHNF”) District Ranger Bill Westbrook on April 5, 2010.

Please note the following reason why this appeal is addressed to both Mary Wagner and Gary Larsen. While the DN directs appeals to Regional Forester Mary Wagner, when a District Ranger is the Responsible Official, an appeal must go to the Forest Supervisor. 36 C.F.R. § 215.8(a). While the Responsible Officer signed the DN as a District Ranger, he is also currently acting Deputy Forest Supervisor. Appellant leaves it to the two potential Deciding Officers to determine who has proper jurisdiction over this matter.

Decision Document: Decision Notice and Finding of No Significant Impact, Zigzag Road Decommissioning for Habitat Restoration, Increment 2, Environmental Assessment

Decision Date: April 5, 2010

Responsible Official: Bill Westbrook, Zigzag District Ranger, MHNF

Appeal Period End Date: May 20, 2010

Description of the Project: This project would decommission unneeded roads in the Zigzag Ranger District.

Location: The following watersheds in the Zigzag Ranger District: Cedar Creek, Clear Creek, Eagle Creek, Gordon Creek, Tanner Creek, Sandy River, Wildcat, and Zigzag Canyon.

Appellant’s Interests:

Bark has a specific interest in this project and project area, and that interest will be adversely affected by this project. We have previously expressed our interest in this specific project, and have standing to appeal this decision according to 36 CFR § 215.13. Bark is a non-profit organization based in Portland, Oregon and has worked to protect the MHNF since 1999. Staff, members, volunteers, supporters, and board members of Bark live in the communities surrounding the MHNF and use and enjoy the Forest extensively for recreation, drinking water, hunting, fishing, general aesthetic enjoyment, family gatherings, viewing flora and fauna, gathering forest projects, and other purposes. Specifically, Bark’s people have used the project

area for hiking, camping, mushroom gathering, photography, and family gatherings. The value of the activities engaged in by Bark members and staff will be irreparably damaged by improper implementation of this project. We have a long-standing interest in the sound management of this area and the right to request agency compliance with applicable environmental laws.

### **Requested Relief**

Remand this decision back to the District Ranger with instructions to release a supplemental EA and new DN/FONSI, in accordance with the procedures described in F.S.H. 1909.15 §18.4, which includes the considerations and requests listed below.

1. Include disclosure of specific timber management plans for the project area and their environmental impacts. Also disclose any plans to base any decisions on the appropriate treatments for decommissioning roads on the desire to keep roads in storage for any future timber management. Provide analysis of the environmental impacts of these decisions.
2. Ensure that any activity that results from this project, including timber management plans such as pre-commercial thinning, falls within the purpose and need of this project and the Forest Plan.
3. Provide for accurate cost benefit analysis.
4. Decommission the 3626-105 and work with volunteers to build a new short trail spur to provide access to the Douglas trail on the main stem 3626.
5. To best meet the purpose and need of this project, decommission without delay the 3626-038, 107, 108, 111, 114, 140, and 150 roads, the 2609-136, 132, 133, and 135 roads, the 1828-125 road, and the end portion of the 1828-118 road.
6. Provide a specific timeline for all the road decommissioning included in this project to be completed. Also explain what funding will be available to ensure that any delayed decommissioning is properly implemented.
7. Disclose the planned prescriptions for each road.
8. Ensure that other District Rangers understand the importance of meeting with and working closely with interested parties such as Appellants in all stages of road decommissioning projects to ensure the best possible outcome for these projects.

### **Statement of Reasons**

#### **i. Introduction**

Bark is generally happy that Mt. Hood National Forest, and in this case the Zigzag Ranger District, is undergoing a process of evaluating its road network and decommissioning unneeded roads for habitat restoration. In general the District Ranger has done a good job at the crucial task of identifying unneeded roads and recommending them for decommissioning.

Decommissioning unneeded roads will not only improve water quality and habitat, it will also help prevent unlawful human use of the forest and allow natural processes to prevail in unroaded portions of the Forest. We look forward to continuing to work with Forest Service staff to achieve important restoration goals in all of Mt. Hood's Ranger Districts.

#### **a. History of Bark's Involvement with Road Decommissioning in Mt. Hood Generally**

Bark has been advocating for roads to be decommissioned on Mt. Hood for eleven years. Bark stood in strong support of MHNF during the controversy with Clackamas County that ensued when the Fish Creek roads were decommissioned. Bark joined the Clackamas Stewardship Partners in 2004 and advocated for road decommissioning projects throughout our four years with that group. We have repeatedly asked the MHNF to comply with the 2005 Travel Management Rule's mandate that each forest identify its minimum road system. *See eg* Bark's Scoping Comments re Road Decommissioning in Zigzag Ranger District, 10/12/09 ("Bark's Scoping Comments"). Since 2008 we have worked with the Washington Watershed Restoration Initiative on bolstering funding for the Legacy Roads and Trails Program. We have submitted appropriations requests and met with our elected representatives to ensure adequate funding for this vital program and for MHNF specifically every year. Recognizing the limited resources of the Forest Service and the need for additional information about MHNF's road system, Bark organized an eight day event in June of 2008 where volunteers collected detailed information on 150 miles of roads in MHNF. Bark has participated actively in increments one and two of MHNF's five increment road decommissioning plan and plans on continuing to be actively involved throughout this process.

#### **b. History of Bark's involvement with the Zigzag Road Decommissioning**

Bark timely submitted scoping comments on this project on October 12, 2009 and also reached out to numerous other interested parties, encouraging them to also comment. At that time Bark expected that the next step was for a draft EA to be released with another opportunity for public comment, as is the customary in MHNF. Still, Bark provided both general and specific comments at scoping. We also expressed an interest in working with the Forest Service in this process, but this offer was ignored. On April 5, 2010 we were surprised to learn that a Decision Notice/FONSI had been released along with a final Environmental Assessment, effectively negating any opportunity for public input on this decision outside of the appeals process. Upon reviewing the documents associated with this decision Bark noticed that the bulk of our comments were ignored or not incorporated into the decision. We also visited a portion of the project area to get a first hand understanding of the condition of some of the roads that the Decision recommended not decommissioning or decommissioning with delay. Finally, we met with District Ranger Bill Westbrook and Forest Environmental Coordinator Michelle Lombardo on May 5, 2010. At that meeting we discussed some of our concerns and learned more about some of the reasoning behind the Decision, but ultimately realized that we had no choice but to appeal this Decision.

#### **ii. Issues and Reasons**

- a. The Agency Must Disclose Specific Timber Management Plans for the Project Area and Their Environmental Impacts, Any Plans to Base Any Decisions on the Appropriate Treatment for Decommissioning Roads on the Desire to Keep Roads in Storage for Any Future Timber Management, and Provide Analysis of the Environmental Impacts of these Decisions**

It appears that anticipated future timber management activity played a substantial role the decision making process for this project, but the DN and EA provide very little disclosure or analysis of this planned activity. This decision includes numerous roads totaling approximately 15 miles marked for decommissioning with delay. The concept of decommissioning with delay is not explicitly defined, although it mentioned in the scoping letter and in the EA that “[m]ore than half of the road mileage planned for decommissioning could be delayed for anywhere from five to ten years after planned thinning of timber stands.” EA at 73. The EA should have better explained exactly what decommissioning with delay entails. Nonetheless, it is clear that whether timber management activity was planned within the next 5-10 years was a key factor in the responsible officer deciding which roads to decommission immediately and which to decommission with delay. No where in the EA are the exact management activities disclosed or analyzed, making it impossible to take a hard look at the environmental impacts of these reasonably foreseeable future actions.

NEPA requires the Forest Service to analyze direct and indirect effects which may occur later in time but are still reasonably foreseeable. 40 C.F.R. § 1508.8. By not immediately decommissioning roads in the project area, this decision has the indirect effect of allowing timber management activity to occur within the next five to ten years. These effects should be disclosed and the environmental impacts of this activity need to be considered. Furthermore, the cumulative affects of the reasonably foreseeable timber harvest expected to occur in decommissioning with delay areas should be disclosed and analyzed to meet NEPA’s hard look requirement. *See* 40 C.F.R. § 1508.7.

In addition, the Decision does not but should analyze the reasonably foreseeable cumulative impacts of its decision to exclude roads from this decommissioning project, despite their impacts, to provide access to timber stands on non-national Forest lands. The 3626-107 leads to BLM lands where future timber harvests are anticipated, and the 2609 is used to access Longview Timber’s land. The 3626-107 was considered for immediate decommissioning in the EA because it falls within the Alder Creek Watershed and adversely impacts one of Sandy’s drinking water sources. However the DN announced that it would be kept on the system map despite these impacts because it accesses a road that accesses BLM lands. The direct, indirect, and cumulative impacts of the anticipated timber management activity resulting from the decision to keep these road segments on the map should have been but were not disclosed. The impacts of past and current timber management activity on adjacent lands should also have been considered.

Bark understands that MHNF and its neighbors have not yet set into stone all future timber management plans, but some timber management activity is reasonably foreseeable. When information is incomplete or unavailable, NEPA requires the agency to make reasonable efforts to obtain the information, but where it is impossible to obtain, the agency must be clear that the information is lacking. 40 C.F.R. § 1502.22. Neither the EA nor the DN provide any concrete information about timber management plans for the project area or analyze potential impacts in light of the information that is available while still explicitly recognizing that not all the relevant information is available.

Also, it appears that prescriptions for decommissioning could be made based not only on considerations such as reducing hydrological impacts and discouraging access, but also on anticipated future timber harvest activities that would occur outside the ten year window decommission with delay window. If the Forest is planning on “storing” roads for future timber management rather than actually decommissioning roads to restore habitat, then this needs to be fully disclosed and appropriately analyzed. Because the prescriptions for stored roads will be less intensive than those for roads which are fully obliterated, the agency needs to consider the continuing environmental impacts of such roads, even if they no longer appear on the system map. This includes ongoing impacts to wildlife and aquatic resources, and the reasonably foreseeable impacts that could occur if OHV users discover that these “roads” are not fully obliterated, create new trails to bypass the obliterated portions of such roads, and use the remaining non-system roads to create private playgrounds deep in Mt. Hood’s backcountry.

In sum, the EA and DN should have but failed to disclose the substantial role future timber management activity on both Forest Service and area non-Forest Service lands had on this decision and also failed to provide proper analysis of this activity in its direct, indirect, and cumulative impacts analysis.

**b. Any Activity that Results from This Project, Including Timber Management Plans such as Pre-Commercial Thinning, Should Fall within the Purpose and Need of this Project and the Forest Plan**

The stated purposes of this project are:

- Reduce impacts to water quality and aquatic habitats associated with unneeded roads
- Reduce road density to improve wildlife habitat utilization
- Reduce the spread of non-native invasive plants associated with unneeded roads and
- Reduce road maintenance costs

Bark appreciates these important purposes and the needs associated with them. However, it is clear that the timber management activity that is linked to this project falls outside of these stated purposes.

This project focuses on removing “unneeded roads” from the system to achieve the stated purposes. An unneeded road “does not imply that there are no potential administrative uses for a road or that no one uses it for recreation.” EA at 2. Rather unneeded road is defined in the EA as “one that is not currently vital to Forest Management operations and that does not access primary recreational destinations. It means that the limited potential uses do not warrant the cost of annual maintenance to keep a road on the transportation system.” *Id.*

Numerous aspects of this decision fall outside of the purpose and need of this project because they retain roads that clearly fall into the “unneeded category.” No where does the EA or DN explain how the roads marked for decommissioning with delay fall outside of the definition of unneeded. Specific issues relating to some of these roads are discussed *infra*. However, neither the EA nor the DN disclose how managing timber off the roads marked for decommissioning with delay is “vital” to Forest Management operations. Indeed it seems that such management is far from vital. Recreation and ecosystem values, not timber, should prevail in importance in the Zigzag Ranger District. Decommissioning all roads identified for treatment immediately instead

of with delay or not at all meets the purpose and need for this project, but delaying decommissioning essentially puts meeting the purpose and need of this project on delay.

An example of another type road that the DN keeps in the system that falls into the category of unneeded is the 3626-150. The DN explains that it is needed to provide administrative access to the Wildcat Quarry, but does not explain how such access is “currently vital to Forest Management operations” or any intention for it to be used for access to “primary recreational destinations.” This road is a well known destination for unlawful activity and has been for many years. Yes, there are some potential administrative uses, but the definition of unneeded precludes it from being kept in the system, albeit with a gate, within the purpose and need of this project. To meet the purpose and need of this project, all unneeded roads must be immediately decommissioned.

**c. Provide for Accurate Cost Benefit Analysis**

The EA’s “Transportation Costs” section takes a look at the “Costs of Road Decommissioning” and provides a “Costs Summary” but the scope of analysis is impermissibly narrow. NEPA requires the agency to take a hard look at the environmental impacts of a project, and this hard look is aided by a solid consideration of the economic impacts of a project. The economic analysis in this EA is inadequate because it fails to consider a wide range of obvious factors other than the cost of road decommissioning activities and potential savings on road maintenance.

Decommissioning roads has a broad range of economic impacts. The EA fails to consider key issues such as the economic impact road decommissioning will have on ecosystem services in the project area and the economic impacts of improved watershed health. These improvements should reduce the need for interventions such as invasive plant treatment. In addition to these environmentally oriented savings, the EA also fails to consider some of the more socially oriented savings to MHNH’s budget once these roads are decommissioned. Managing and attempting to curtail dangerous activities such as illegal OHV trail building and use, illegal dumping, manufacture of controlled substances, and car stripping on unneeded roads throughout the District and particularly in the Wildcat Mountain area has undoubtedly cost MHNH massive sums. MHNH has been forced to dedicate staff and funds to increased law enforcement, signage, mechanical blocking of illegal trails, and programs such as Dump Stoppers. One of the great benefits of this project is reducing access to areas of historic unlawful use and hopefully, the subsequent curtailing of such activity. Decommissioning unneeded roads will save MHNH money and this positive impact of the project should have been included in the analysis.

**d. Decommission the 3626-105 and Work with Volunteers to Build a New Short Trail Spur to Provide Access to the Douglas Trail on the Main Stem 3626**

Trailkeepers of Oregon (TKO), a group whose membership includes some of Mt. Hood’s most prolific hikers including hikers intimately familiar with the project area, provided detailed scoping comments on this project. MHNH staff echoed TKO’s comments on the challenges experienced by hikers and equestrians seeking to access the Douglas and McIntyre Ridge trails and properly characterized the Wildcat Mountain area as fraught with “extreme user conflicts.”

EA at 69. The EA also noted that closing some of the roads in the area could reduce problems. *Id.*

TKO's comments included the sensible recommendation that the 3626-105 and its spur roads including the 3626-155, 355, 015, and 150 be decommissioned and a new trailhead be placed on the main stem 3626 road. Bark echoed this recommendation. Removing this small network of roads and the entire length of the 105 would go a long way towards reducing the total area available for unlawful activity, including the illegal use of OHVs in the Salmon-Huckleberry Wilderness. Otherwise the Forest can expect to see the 105 continue to act as a gateway for harmful and illegal activities. This proposal would have the added benefit of reducing the burden on law enforcement and Dump Stoppers. Creating one centralized trailhead for this area would also make this area less confusing for recreationists and more secure for parked cars.

Unfortunately TKO's proposal was rejected. EA at 10. While the EA claims that this proposal was outside the purpose and need of the project, this proposal would have allowed for the closure of a road network featuring approximately 4.2 miles of environmentally harmful roads without reducing legitimate recreation opportunities. Most users would gladly hike an extra mile if they understood the benefits of this action. TKO's proposal would allow for the removal of unneeded roads and directly meet the purpose and need of this project. TKO's comments included an offer to partner with MHNH to build this new trailhead and trail, noting its solid reputation of coordinating monthly stewardship projects since 2007, but this offer was rejected. While building new trails is not within the stated purpose and need of this project, building this particular trail is an activity that would go a long way towards achieving the project's purpose and need. The 1825-280 road is being converted to a trail in order to allow continued recreational access while meeting the stated purpose and need of this project, and a similar choice should be made for this road network.

**e. To Best Meet the Purpose and Need of this Project, Decommission Without Delay the 3626-038, 107, 108,111, 114, 140, 150, and 355 roads, the 2609-132,133, 135, and 136 roads, the 1828-125 road, and the End Portion of the 1828-118 Road.**

Numerous roads in this project area have been designated for decommission with delay or have not been proposed for decommissioning despite factors indicating that they should be immediately decommissioned. These include but are not limited to the 3626-038, 107, 108,111, 114, 140, and 150 roads, the 2609-136,132,133, 135, and 136 roads, the 1828-125 road, and the end portion of the 1828-118. Some of these roads are in bad shape, such as the 3626-140, which is heavily channelized, or the 3625-150, which is full of potholes, and almost all of them appear to have been recently and regularly used for activities such as OHV riding on off-road illegal user created trails, illegal dumping, and other more bizarre behaviors.

As explained above, not decommissioning these roads constitutes a failure to meet the purpose and need of the project, or more generously, delays achieving the purpose and need. Bark would like to see all the roads listed in this section promptly decommissioned. However, Bark is particularly concerned about the following:



- All the roads side roads off the 3626, but especially the 155, 355,015, 150, and especially the 105. These roads are magnets for illegal activity, and OHV incursions into the Salmon-Huckleberry Wilderness are well documented. TKO's recommendation to install a new trailhead and decommission these roads should be implemented.
- The 3626-107 and 114 should be immediately decommissioned and obliterated. While the BLM has asked the MHNH to keep this road on the system, it is simply not necessary, especially when the utility of the road is considered in conjunction with its impacts. The 107 leads to a section of BLM land that is accessed by two other roads, roads that come within less than a half mile where the 107 falls onto BLM lands. The BLM's ease of access pales in importance to the other possibilities for this area. Members of the public who presently use this area for legal and illegal activities will figure out that this road is not obliterated and will continue to use it to access the area. The 107 and 114 are the only roads cutting across this area and by decommissioning and obliterating this road, MHNH has the opportunity to squarely meet this project's purpose and of need of reducing road density to improve wildlife habitat utilization. Decommissioning the 107 and 114 would have the great benefit of creating over one square mile of forest without any roads, especially once the 108 and 111 roads are decommissioned, which we believe should be immediately. In addition, decommissioning and obliterating the 107 and 114 would reduce ongoing impacts to Alder Creek, improving water quality at this drinking water source for the City of Sandy. Decommissioning this road would have the added benefit of ensuring that traffic associated with timber management on BLM lands would not affect the portions of Alder Creek managed by MHNH.
- The 2609-140 and 150 roads should be immediately decommissioned. These roads fall within the Forest Plan's A9 designation, Key Site Riparian. In A9 areas, Mt. Hood's Forest Plan states that "[r]egulated timber harvest shall be prohibited." A9-020. Furthermore, "[s]ilvicultural techniques, including timber harvest, may occur only to maintain or enhance riparian resource values." A9-021. Because timber management activity is so narrowly constrained, common sense dictates that these roads, and the segment of 2609 that follows them to intersect with the 3626, should be immediately decommissioned.
- The spur roads off the 2609, including the 123, 133, 135 and 146 should all be decommissioned immediately. None of these roads are vital to MHNH's operations and removing them will reduce opportunities for unlawful behavior and improve habitat and stream quality.
- The 1828-125 and end portion of 118 should be decommissioned immediately rather than decommissioned with delay. The 125 is one of two roads running parallel to Clear Fork and is causing unnecessary environmental impacts. The end portion of the 118 runs directly into Clear Fork, also causing unnecessary impacts. In addition, both of these roads are in an area that is heavily used for recreation and reducing road density in this area not only improves aquatic and wildlife habitat, it also reduces confusion for the recreating public, who already have to contend with an extremely confusing and vast road network in this area.
- This project also fails to achieve Forest Plan Standards for road density in winter deer and elk range in the Zigzag Canyon. The EA explains that this standard is

“impossible” to achieve because of the continued need for access to summer homes and the highway. EA at 64. NFMA commands that plans should be consistent with Forest Plan standards. 16 U.S.C § 1604(i). This project, which only decommissions .2 miles in this important habitat, fails to achieve significant movement towards achieving Forest Plan Standards. This project should go further to achieve the winter range standards in the Zigzag Canyon.

**f. Provide a Specific Timeline for all the Road Decommissioning Included in this Project to be Completed. Explain what Funding will be Available to Ensure that any Delayed Decommissioning is Properly Implemented**

Bark has worked to ensure that the MHNH gets adequate funding from the Legacy Roads and Trails Program to do road decommissioning work. However, there is no guarantee that this program or type of work will be adequately funded in future years. Bark has been pleased to see the Forest moving quickly on road decommissioning projects to take advantage of currently available funding. However, we are concerned that in the next 5-10 years funding may no longer be available to complete planned work on roads slated for decommission with delay. Bark also strongly believes that it is inappropriate to fund restoration projects through commercial timber sales. Bark asked for an explanation of the likely sources of funding for this project in our scoping comments. This request was ignored, so now we are repeating it. In disclosing the environmental impacts of this project, MHNH needs to disclose how it is planning on paying for the road decommissioning. If this project will be funded by timber sales, then the direct, indirect, and cumulative impacts of these reasonably foreseeable timber sales must be disclosed. If Legacy Roads funds are to be used, then we need a better understanding of how the Forest will ensure these funds are available in 5-10 years when it is time to decommission roads with delay. If there is a chance that funding will not be available for this decommissioning, then this also needs to be disclosed. Without any understanding of the funding mechanisms, the public cannot meaningfully weigh in on this project.

**g. Disclosure the Planned Prescriptions for Each Road**

Bark’s scoping comments also included a request that the MHNH disclose planned prescriptions for each road in its EA. We appreciate that the EA disclosed generally some of the types of treatments that could be expected in particular situations. However, we would still like more information about the exact treatments planned for particular roads. The hard look required by NEPA mandates more specific analysis. The Forest Service should provide a list of anticipated prescriptions in its analysis so that the prescriptions can be scrutinized. An example of why this is important can be seen in the Upper Clackamas. Here a road that was covered by the road decommissioning EA was utilized, post-decommissioning (i.e. the first couple hundred feet obliterated and stabilized) by OHVs. OHV riders were able to access it from a parallel road and quickly discovered a private playground on this “decommissioned” road. Because it is nearly impossible for law enforcement to access these areas, this use of decommissioned roads could allow for activities far more nefarious than just unlawful OHV use. We are concerned that decommissioned roads in the Zigzag could be similarly utilized if they are not properly obliterated and remain accessible from other roads.

**1. Ensure that Other District Rangers Understand the Importance of Meeting with and Working Closely with Interested Parties Such as Appellants in all Stages of Road Decommissioning Projects to Ensure the Best Possible Outcome for These Projects.**

Bark, TKO, Mt. Hood Corridor CPO, and numerous interested individuals communicated in scoping comments our excitement about this project and our desire to work collaboratively with MHNH to ensure a terrific outcome of this project. Bark was never contacted, and others have reported phone calls but no face to face meetings or trips to the field to discuss the specifics of this project. Because this area is so treasured by so many recreational users, this project was a great opportunity to work collaboratively with stakeholders. MHNH failed to utilize this opportunity to build relationships and engage the interested public.

Bark would like to see this situation avoided in the future increments of road decommissioning and in future projects. We propose the following:

- Pre-scoping, inform Bark and other key stakeholders of plans to begin the process of identifying roads for decommissioning. This will allow us to begin the slow process of gathering information valuable to our analysis.
- During scoping, hold at least one open house at the Ranger District's office.
- Include maps in the scoping notice.
- When asked, meet with interested parties in the field to discuss concerns.
- Release a draft EA, with maps of all the alternatives, with a 30 day comment period.
- After the comment period closes, follow up with stakeholders who express a desire to communicate directly about the plan. This follow up should not just be by phone, but by face to face meetings either at a mutually convenient location or in the field.
- Release maps of the final decision with the DN/FONSI.

**Conclusion**

Bark appreciates your prompt attention to this matter and looks forward to discussing ways for you to implement our requested relief.

Sincerely,

Lori Ann Burd  
Restore Mt. Hood Campaign Manager/Staff Attorney  
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