BARK
PO Box 12065
Portland, OR 97212

www.bark-out.org
503.331.0374

Michelle Lombardo
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: Clackamas Road Decommissioning for Habitat Restoration - Increment 2

January 11, 2010

Dear Michelle,

The following are Bark's comments in regard to the Clackamas road decommissioning for habitat restoration increment 2 scoping notice and maps.

Before delving into specific comments, we would like to thank you and your team. Bark represents nearly 5,000 concerned citizens who recognize the urgent need to decommission roads in Mt. Hood and support your work on this project. We understand that there are members of the public who will complain about this project and Bark seeks to balance these complaints with compliments. This project, which reflects both the urgent need to decommission ecologically destructive roads as well as the will of the majority of citizens who no longer want to fund an oversized and crumbling road network, is an excellent step in the right direction for Mt. Hood National Forest.

a. Purpose and Need of this Project

Bark supports the stated purpose and need of this project. In particular, we note that the decommissioning of longer road segments, such as the 4640000, 4670150, 4311000, 6321000, 6322120, 6340280, 6350160, 6370000, 7010160,7020120, 7021000, and 7030120, is absolutely

necessary to achieve the stated purpose and need of this proposed action.

We would add that analysis of the impacts of climate change should be considered in the EA for this project. To achieve the state purpose and need, the EA should disclose projected impacts climate change will have on the project area, and how the project will manage those impacts.. Experts on climate change generally agree that our area should expect increased winter storm frequency and intensity. Reducing the road network in Mt. Hood National Forest should decrease the harm resulting from events such as road blowouts, and could be a positive step towards creating a more climate change resilient forest. This benefit should be disclosed in the EA.

Some groups may suggest seasonal road closures as a way to keep roads on the system. Incorporating seasonal closures on the proposed roads will prevent the achievement of the proposed purpose and need of this project. Seasonal closures will cause continued adverse impacts to aquatic resources, fails to meet the objective of reducing road density, will cause the continued spread of invasive species, and will only minimally reduce road maintenance costs. We urge you to resist the pressure to seasonally open roads identified in this project as ripe for decommissioning and to stay true to the stated purpose and need of this project when considering proposals from the public.

To achieve the purpose and need, the Forest Service should consider adding proposing additional roads to this project, and should also attempt to reduce the roads proposed for decommissioning with delay. At this time, funding is available to achieve this projects purpose and need, and it appears that funding will continue to increase for projects such as this one. However, no one know what the funding situation will be in ten years. The best way to ensure that the goals of this project are achieved is to decommission roads as soon as possible.

b. Travel Planning Generally

Bark appreciates the efforts of the Forest Service to identify and decommission unneeded roads in Mt. Hood National Forest and specifically in the Clackamas Ranger District. We are delighted to note that this project is more ambitious than prior road decommissioning projects and offer our appreciation to the Forest Service for taking the political risk necessary to do the right thing for this heavily roaded watershed.

We are pleased that the survey of roads to consider for decommissioning included those that lead to forest stands that the agency intends to

harvest in the future. We understand that it is a large undertaking to collect this information, but believe that it lends more credibility to decision-making and improves the quality of data that exists on the road system. Exempting these roads, as was done in the 2009 Clackamas Aquatics Restoration EA, is a sure way to miss roads at risk of significant aquatic impacts. In addition, it ensures that the forest road system remains unsustainably large and is not brought within the fiscal constraints of the Mt. Hood budget. That said, we remain concerned about how the piecemeal approach to road decommissioning in Mt. Hood National Forest will fit with the directive of the travel management rule.

The Travel Management Rule mandates identification of a <u>minimum road system</u> in each and every national forest. Unnecessary roads should be decommissioned.

> "For each national forest, national grassland, experimental forest, and any other units of the National Forest System (§212.1), the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands…" Roads "that are no longer needed to meet forest resource management objectives… should be decommissioned or considered for other uses, such as for trails. Decommissioning roads involves restoring roads to a more natural state…. Forest officials should give priority to decommissioning those unneeded roads that pose the greatest risk to public safety or to environmental degradation."

36 C.F.R. 212.5(b). Mt. Hood National Forest has opted to instead focus on decommissioning roads in a five increment process not specifically based on this directive. Bark supports the Forest Service's efforts to decommission roads, especially in this more ambitious increment. However, while the result of this process will be a significant improvement over the status quo, the Travel Management Rule's mandate to identify a minimum road system will still need to be fulfilled. We remain concerned that the Forest's efforts during this five increment process will need to be duplicated when the mandate to achieve the minimum road system is implemented nationally.

The Travel Management Rule clearly states that the identification of roads and their respective purpose shall be a deliberate process,

> (a) *General criteria for designation of National Forest System roads, National Forest System trails, and areas on National Forest System lands.* In designating National Forest System

> roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration.

36 C.F.R. 212.55. The current process prioritizes road decommissioning based on risk to aquatic resources, with the exception of the "decommission with delay" categorization. However this is all that it accomplishes. After the 5 increments are complete, will the resulting system be a conglomeration of roads that are not immediately threatening aquatic ecosystems? Or will it be a system that meets the needs outlined in the Travel Management Rule? The EA should address how this incremental process will fit in to ultimate mandate of the Travel Planning Rule, the identification of a minimal road system.

The ID team should carefully consider two significant and new guidance documents. The first is the draft guidance produced by Region 6 on how to achieve the minimal road system. The second is a report from Forest Service headquarters to Congress on how it will achieve the minimum road system. This report, at the time of this comments' mailing, was under review by the Office of Management and Budget, but should be formally submitted within the next several weeks. The existence of guidance from Region 6 and the National Forest Service office indicates that Mt. Hood should not forget about its mandate to identify a minimum road system, but rather should carefully consider how to integrate this project into that concept.

Bark suggests two ways that the Forest Service work to make the 5 increment process include other management objectives:

1) Include descriptions in the EA of the purpose served by the remaining (post-implementation) road system and how it relates to the road system elsewhere in the Forest. This will aid in the eventual identification of a minimum road system.
2) Include in the EA an assessment of "the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated…" Bark proposes one simple method for this analysis below.

Bark recommends the use of the 1999 Access and Travel Management Plan (ATM) to make the process more efficient. The 1999 ATM was

"intended to analyze the desired future condition of our travelways on the Forest." The ATM is the proper starting place for decisions on roads to be based. The plan is responsive to the Northwest Forest Plan and the Mt. Hood Land and Resource Management Plan. It deliberately identifies those roads that have a specific purpose, and suggests closures/obliteration for those that do not.

One significant inconsistency between this decommissioning project and the ATM is the use of the words "decommissioning" and "decommissioning with delay" prescriptions instead of the ATM's "close" or "obliterate" recommendations. The ATM's definition of these roads, and the basis for those roads that show up grey in the attached map, is described in the ATM.

> **Closed Roads or Roads Available for Closure or Obliteration.** Closed roads are closed to traffic, but remain on the road system. These roads have an identified future use *(generally within seven years).* Roads needed for future timber harvest activities or fire protection efforts would fall into this category. Roads identified for obliteration have no identified future use *(generally within ten years)* or are a high risk for resource damage. Need for closure or obliteration exceeds funding, so roads at highest risk for resource damage or other important resource concerns are closed or obliterated first. Roads not funded for closure or obliteration will naturally close due to lack of maintenance over time. Some of these roads may be converted to trails if identified in the Forest Trail Management plan.

ATM at 9 (*emphasis added).* Literally, the ATM recommendation is that roads that will not be used in 10 years are candidates for "obliteration." **If funding was available and the ATM had been implemented, Mt. Hood National Forest would have reduced its road system nearly 49% by this year.** Instead, the use of "decommission with delay" in this project is a defacto extension of this timeline, and does not respect the urgency of reducing the road system which was identified as a priority in 1998 by Forest Service Chief Mike Dombeck and subsequently ratified in the Travel Management Rule described above.

In 2008 Bark, the Clackamas Stewardship Partners, and watershed advocates throughout the Pacific Northwest rallied around Congressman Norm Dick's Legacy Roads and Trails Remediation Act, which began providing dedicated funds for road removal that same year. In 2009, 90 million dollars were dedicated towards Legacy Roads and Trails, indicating that Congress remains deeply concerned about this matter.

Bark recommends that the Forest Service adopt the ATM-recommended prescriptions in the Collawash project and all future road decommissioning projects.

1) Roads that are needed for resource goals in the next seven years, but are not necessary to be opened to traffic will be closed using a gate or berm and trap and boulders.
2) Roads that are not needed for resource goals in the next ten years will be obliterated, using active techniques such as decompaction, slope recontouring, culvert removal and stream channel recontouring, and replanting.

Understanding that funding for this work became available and has only increased since 2008, Bark recommends that Mt. Hood National Forest reset the clock and use 2008 as the starting point for the 7-year and 10-year thresholds. *While this is the equivalent of a nine-year delay in the recommendations contained in the ATM, it appears to be a reasonable course of action.* It ensures that the ongoing ecological impacts and taxpayer burden of the road system will be addressed in a timely manner and will not be subject to arbitrary and seemingly indefinite delays.

Our concerns also lie in what might still be missing by not utilizing the procedures described in the Travel Management Rule. The Rule requires that, "[i]n determining the minimum road system, the responsible official must incorporate a science-based roads analysis at the appropriate scale and, to the degree practicable, involve a broad spectrum of interested and affected citizens, other state and federal agencies, and tribal governments." 36 C.F.R. 212.5(2)(b)(1). For instance, without broader outreach to the recreation community, the Forest Service may make decisions that would adversely impact this community. By reaching out to a broad community of stakeholders, the Forest Service will be able to garner support and public confidence in this important restoration effort.

c. <u>The EA Should Provide Clarification of Prescriptions</u>

When the Forest Service proposes to decommission roads, the public is left with very little information about exactly what is being proposed. Bark requests that the Forest Service, in the EA, explore not just the environmental impacts of decommissioning or obliteration generally, but also explain what type of treatment it expects to employ at each road. Bark requests that the Forest Service use the term "close" to mean the use of active or passive means to close the point of entry to a road. This includes building gates, earthen berms, "tank traps," and allowing natural vegetation to hide the entrance. The purpose of closing a road, as described in the ATM, is to keep roads on the road system that should be closed to traffic but will be needed for future activities (generally within seven years). "Obliteration" is the recommended term for blocking

all vehicle use *and* minimizing the road's hydrologic impact to the extent feasible, with no expectation for future use. Bark recommends that proper obliteration include the following:

1) Reestablishing former drainage patterns, stabilizing slopes, removing nonnative species and restoring vegetation;
2) Removing the roadbed by restoring natural contours and slopes;
3) Removing culverts, reestablishing drainage-ways, removing unstable fills, pulling back road shoulders, and scattering slash on any remains of a roadbed.

As Bark raised in its comments on the Forestwide Aquatics preliminary assessment published in 2008, and at multiple face-to-face meetings with Mt. Hood staff, it is critical that the EA include specific prescriptions for action on those roads it is recommending for closure or obliteration. Bark believes that this is important for the Forest Service to meet its requirement for a "hard look" as required by NEPA, otherwise the impacts of the action cannot be adequately considered. We hope the Forest Service will not simply assume base its analysis on a overarching prescription which may or may not be implemented across all these roads. Rather, we hope that the EA will provide the public with some insight into the framework roads engineers will consider when determining the course of treatment required for each individual road. Factors for consideration in this analysis would of course include aquatic risk posed by the road, type of road surface, and possibility for revegetation. Without this specific information, the project described in the EA will be vague, the potential impacts of the project will not be fully disclosed, and it will be impossible for the public to provide meaningful input.

The Clackamas River watershed provides an illustration of this point. If the Forest Service "decommissions" 1,000 miles of road in the Clackamas watershed, yet the decommissioning does not include decompaction and revegetation of the roadbed, it will have a dramatically different impact on the watersheds ability to infiltrate runoff than if it did include these activities. Bark expects that the upcoming EA will address this issue by outlining specific actions and analyzing their impacts.

Also, we note that many of the roads proposed for decommissioning in this project are currently gated and thus inaccessible to the public, yet the scoping notice does not indicate this crucial fact. This could lead to public to mistakenly believe that they are losing access to roads they could presently utilize for motorized access when in reality the many of the roads proposed for decommissioning are already inaccessible. The EA should disclose this reality, in order for the public to better grasp the

fact that this project will not significantly change the area currently available for public access.

d. "Obliteration" is the Only Prescription that Properly Addresses the Collawash River Watershed's Hydrologic Instability

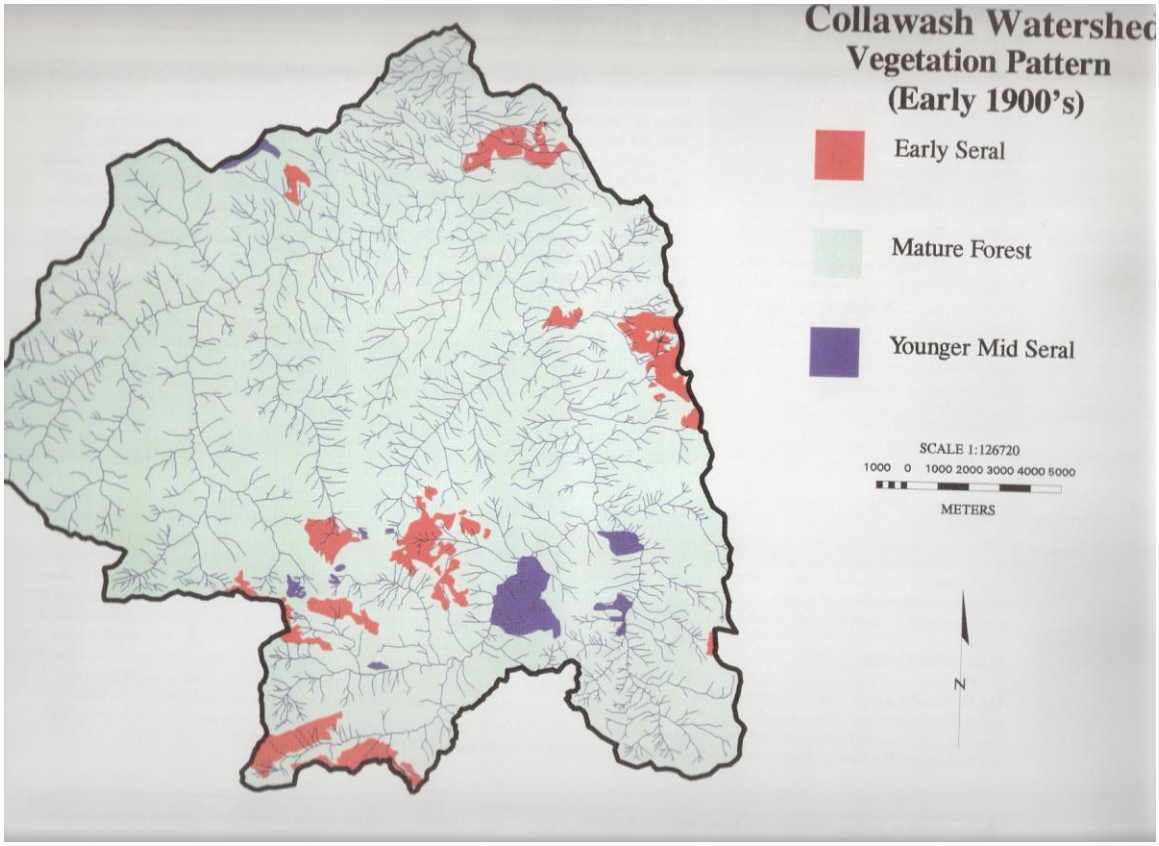
In addition to the presence of earthflows and other landslides within the watershed, the Collawash River is prone to peakflow events due to the transient snow zone. The following excerpt from the Collawash Watershed Analysis ("WA") that describes the importance of this effect.

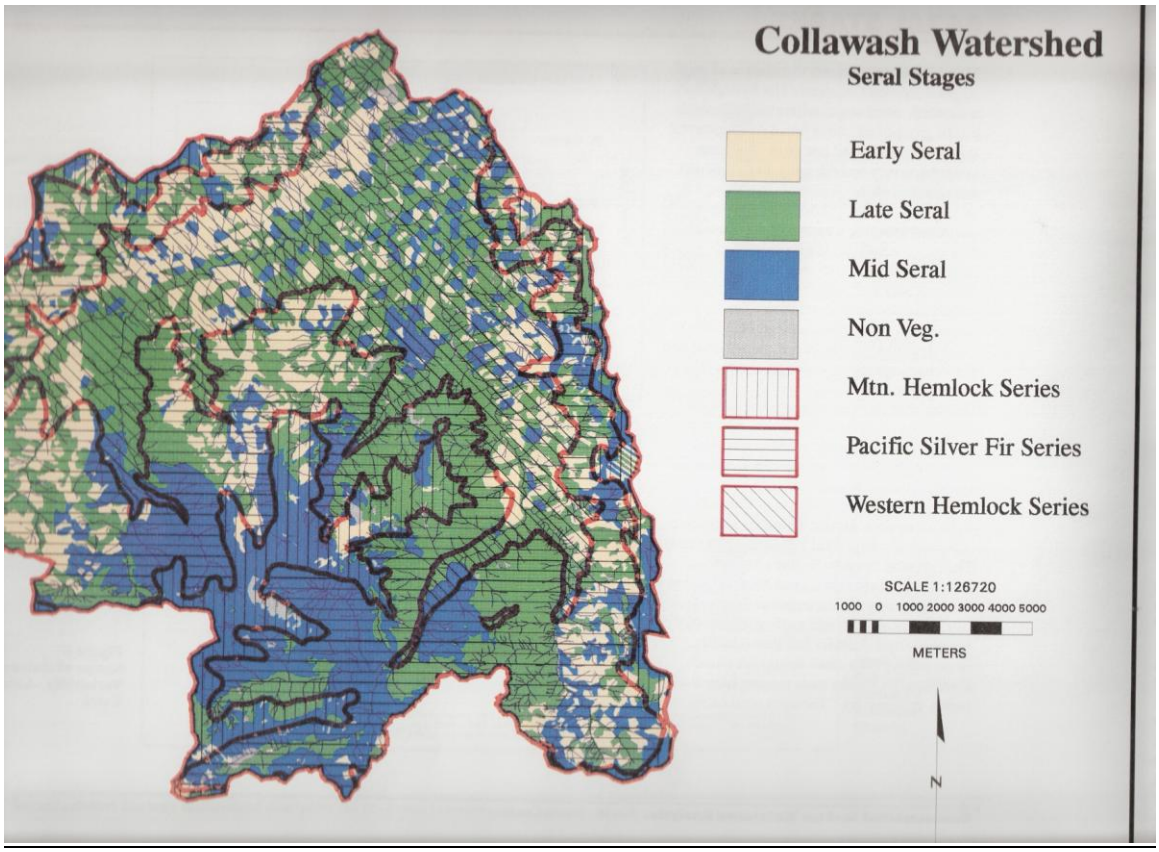
> *Transient Snow Zone. Collawash River flood events are similar to other documented floods in the Cascades. These peakflow events occur during the rainy season, following a rapid and substantial depletion of snowpack during a prolonged rain-on-snow period in the "transient snow zone" (a zone of significant snowpack accumulation). While approximately 80 percent of the watershed lies within the normally occurring transient snow zone, the entire watershed is subject to rain-on-snow events incorporating areas of lesser and greater snowpack accumulations.*
>
> *Created Openings. Research elsewhere in the Cascades has shown that more snow accumulates in openings than under canopies and that during rain-on-snow events the runoffs from these areas are more rapid. Timber harvest activities (particularly clearcuts) and other created openings (roads, windthrow areas, fires, etc.) are areas of increased snow accumulation. Rapid runoff from these areas increases the magnitude of peakflows during a rain-on-snow event, resulting in channel scour, downcutting, and/or widening.*
>
> *Roads. Road surfaces and cut slopes are essentially impermeable to rainfall and snowmelt. They intercept shallow subsurface flow and concentrate surface runoff. Road ditches function as extensions of intermittent streams, increasing the overall drainage density and transporting water more rapidly than natural processes. Increased road densities result in more water being delivered to streams within a shorter timeframe, affecting the frequency and magnitude of peakflows.*

WA at 3-13. We urge you to fully obliterate as many roads as possible and fully utilize the possibilities created by increased funding through Legacy Roads. Obliteration is also necessary to meet the road density targets discussed in the WA. The EA should discuss how this project will lead to the achievement of the road density targets identified in the wA. **Finally, to achieve the goal of obliterating as many roads as**

possible, we urge you to consider pooling resources with other forests in order to purchase advanced equipment to obliterate and revegetate roads.

The Clackamas Stewardship Partners recently submitted comments to the Forest Service regarding this project, stating "[e]arly seral habitat appears to be declining across the forest and we would like the Forest Service to consider future access needs to manage forage for terrestrial species." According to the Collawash WA prepared by Mt. Hood National Forest staff, this statement is inaccurate. The maps below, contained in the WA, demonstrate a significant increase in early seral forest in the project area. If seasonal closures to roads are to be considered in the EA, we ask that the Forest Service provide evidence that 1) deer and elk are below historic levels; and 2) retaining roads will help game species such as elk and deer.





We are also concerned about the decommission with delay concept. While we appreciate that this status allows the Forest Service to decommission roads where future timber sales are planned, we are concerned that these roads may end up not being decommissioned. Ten years is a long time, and it would be a shame if the Forest Service somehow forgot to decommission these roads, deprioritized decommissioning these roads, or no longer had the funding available for the project. Please use the EA to explain how the Forest Service will implement decommissioning with delay, including an analysis of how funding for decommissioning will be obtained in ten years.

Finally, in the "Proposed Action Road Data" spreadsheet, the Forest Service notes that many areas proposed for decommissioning will be ready for thinning in five or ten years. At a recent Clackamas Stewardship Partners meeting, Forest Service representatives indicated that on these roads, engineers have ascertained that it is cheaper to decommission the roads and then either recommission them or build temporary roads in order to reach timber stands in the future. This is troubling to say the least. These roads are being decommissioned to reduce threats to aquatic resources, and this work will be for naught if they are reopened in the future. The Forest Service needs to both disclose this plan of action in the EA, take a hard look at the foreseeable

future impacts of such actions, and disclosure the cumulative effects of such actions.

e. The EA Should Provide a Method for Analyzing Future Maintenance Burdens

The 2003 Roads Analysis states that Mt. Hood National Forest's road system could be reduced by nearly 50%. This is based on the 1999 Access and Travel Management map.

Although at first blush 50% sounds like an aggressive amount of road removal, taxpayers need the Forest Service to adjust this number based on site-specific information. In reality this number may be 65%, or it may be 35%, it is depending on what is required to "maintain all roads so they function properly" as described in the scoping letter. Bark suggests the following as one method for determining this number:

1) Determine the percentage of Mt. Hood's overall roads maintenance funding that can be dedicated to the project area. This is best accomplished by road maintenance category, and is simply the mileage of each category road in the project area divided by the total in the forest. For example, if there are 100 miles of category 2 roads in the project area, and there are 2,000 forest-wide, then on average it can be expected that 5% of the forest roads budget for category 2 roads will be spent on roads in the project area.
2) Take the average of the last 5 years of road maintenance funding and multiply it by the percentage determined above to predict future road maintenance funding for the project area. For example, if the average road maintenance budget for the entire forest over the last 5 years is $1,000,000, then multiply it by your percentage above, 5%, and it can be reasonably predicted that $50,000 will be available for ongoing maintenance of the roads in the project area after implementation of road decommissioning activities.
3) The resulting road system in the project area should be of a length and category that will be under or near this ongoing maintenance level.

Also, the additional costs associated with ongoing maintenance of closure devices (gates, etc) should be disclosed in the EA if the proposed action includes them.

f. Integrating Public Comment

Bark recognizes that this project, like all road decommissioning and restoration projects, will be controversial to some members of the public.

Some people of the public may be generally alarmed by the mileage of roads proposed for treatment. People with these general concerns may find comfort in the fact that many of the roads proposed for decommissioning are already gated and that these are not roads leading to key recreation destinations. We do not support the closure of roads that lead to key recreational access points such as trailheads, especially in an area, like this one, where there are few trails. But we do support closures of roads that are used by very few people. We appreciate that the Forest Service is sensitive to the concerns of individuals who care deeply about certain segments of the forest. However, we are concerned that the aquatic restoration goals of this project may be thwarted if too many roads are kept on the system due to complaints. Thus we urge you to be judicious in considering site specific complaints and focus on the broader public good.

Bark represents almost 5,000 members who support this project and recognize the urgent need to decommission roads in order to protect aquatic resources. This part of the forest has a vast network of confusing roads, but few opportunities for quiet recreation. Bark has heard from members of the public who are delighted to hear that roads in this area will be closed simply because the reduction of the road system will make it easier for them to find recreation destinations such as Bagby Hot Springs and the Elk Creek Lake Trail (#559) even when road signs have been shot down.

We also see this project as an opportunity to create more recreation opportunities in the area. We urge you to consider converting some of the more scenic and stable roads proposed for decommissioning to trails in order to increase hiking opportunities in this area. The scoping letter does not address the process by which recreation groups (mountain biking, hiking, horse riding, etc.) will be consulted, but we urge you to not overlook this opportunity. We look forward to an analysis of how this project will affect recreation opportunities. We encourage you to carefully consider the comments submitted by Trailkeepers of Oregon regarding these matters.

g. <u>Site specific recommendations</u>

Road 6310: A number of the spur roads proposed for decommissioning in this area provide access to power lines. In the EA the Forest Service should disclose specific considerations regarding road closures in power line corridors.

Road 6310015: This road is not currently proposed for decommissioning and it is not on the map. However, it is not properly decommissioned

and should be included in this project. The "road" above the one culvert here is collapsing into the surrounding wetland.

Road 6310170: This road is currently proposed to be decommissioned with delay but should be proposed for prompt decommissioning. This road contains 24 culverts, mostly for ditch relief. Most of these culverts are in poor condition, either plugged or buried, creating problems for nearby aquatic resources. In addition, evidence of grouse, coyote, deer, elk, and black bear have all been observed here, indicating this is important habitat and immediate decommissioning is appropriate.

Road 6310180: This road is not currently proposed for decommissioning but should be considered, as it is a long spur that leads to power lines which could be accessed from other points. In addition, it should be considered for conversion to a trail, as it provides scenic views of the area.

Road 6310185: This road is not included in this project, but should be. It has been damaged by ATV use, but includes a good diversity of trees and is heavily utilized by deer and elk. The four culverts on this road are in need of repair or removal.

Road 6330013: This road has not been included in this project but should be considered for decommissioning because of evidence of erosion and sagging.

Road 6340170: This road has been proposed for decommissioning with delay, but should be considered for more immediate decommissioning because its geologic instability is leading to erosion and several of the culverts are functioning improperly.

Road 6340230: This road has been proposed for decommissioning with delay, but should be considered for immediate decommissioning because of erosion and because a stream is running along the roadway.

Road 6370: Decommissioning this road is one of the most exciting aspects of this proposed project and Bark urges you to change the recommendation to decommission with delay from 130 junction to Round Lake to decommission. The removal of this road from the system will create an important wildlife corridor extending beyond the Bull of the Woods Wilderness area near Round Lake. Decommissioning this road would also reduce road density in areas with significant landslide risk. The removal of this road would reduce disturbance in an area that stretches from higher elevation to lower elevation which will be important for wildlife as they adapt to shifting habitat in a changing climate. Seasonal road closure is inappropriate here as it would only benefit

wildlife during certain times of the year. In order to mitigate the impacts of climate change we will need to restore and improve wildlife habitat options year round, not just during certain months. This road also bisects designated critical habitat for the Northern Spotted Owl. Removing this road will assist in the recovery of NSO in this area as reduced road density and disturbance from vehicles would improve nesting and foraging habitat.

Road 6311 and 6321: Removing these roads would provide important habitat for wildlife at lower elevations that have winter range for deer and elk. Mt. Hood National Forest lacks unroaded and undisturbed habitat for deer and elk within their winter range. Lowering road density increases the changes of successful calving, thus creating habitat that is suitable for calving in this range is important. A seasonal road closure here would circumvent the stated purpose and need of the project because it would only benefit wildlife during certain times of the year. In order to mitigate the impacts of climate change and improve terrestrial habitat utilization, the Forest Service must restore and improve wildlife habitat year round. In addition, numerous culverts on the 6311 have been found in serious disrepair

Road 6311130: No action was proposed for this road, but it should be considered for decommissioning. This road, which contains two culverts, is in poor repair, and is eroding into nearby Sluice Creek.

Road 6311140: No action was proposed for this road, but it should be promptly decommissioned. This road, which contains six culverts, is extremely close to numerous streams and is in a wetland, causing significant aquatic damage. In addition, a portion of the road has a large fault in the middle. There is ample evidence of ducks, beavers, salamanders, frogs, and elk in the area. As a result of two entirely blocked culverts (one by beaver, one by plant material, two large stagnant ponds have formed off this road).

Road 6311150: This road has been proposed for decommissioning with delay, but should be promptly decommissioned. It cuts through diverse wetlands, with skunk cabbage visible yards away from the road. In addition, the old growth cedars off this road should be protected from future disturbance.

Road 6311160: No action was proposed for this road, but this road should be promptly decommissioned. It is in serious disrepair, and travels through wetlands and old growth forest. Elk and numerous frog species including Oregon spotted frog have been spotted on this road. Of the five culverts on this road, one is plugged and almost entirely buried and another is blocking fish passage An area creek has diverted to

create several channels across this road, and erosion is evident. This road is causing significant damage to aquatic resources and should be decommissioned.

Road 6311170: This area has been proposed for decommissioning with delay but should be decommissioned promptly because it is causing significant harm to aquatic resources. This road cuts across a wetland and is having significant impacts on the hydrology of this area.

Road 6311180: No action was proposed for this road, but it should be considered for decommissioning. This road travels through wetlands, riparian zones, botanically rich meadows, and old growth. There are seven culverts here, and at least one of them is significantly too small for the large stream which flows through it. A portion of this road has been obliterated and replanted, and there is no reason that the rest of the road should be kept in the system.

Road 6330 and 6341: These two roads are perhaps the most important to restore in the whole project given the benefit of increased undisturbed area this would create. Currently these roads bisect the habitat between the Hot Springs Fork and the Bull of the Woods Wilderness. Removing the 6330 and 6341 will open up significant opportunities for deer, elk and other species that are negatively affected by roads. These roads are also at risk of landslides, so reducing roads in this area will reduce erosion for future earthflows. Reducing disturbance in an area that stretches from higher elevation to lower elevation is important for wildlife as they adapt to shifting habitat in a changing climate. A seasonal road closure here is unlikely to be successful and would only benefit wildlife during certain times of the year, thus failing to meet the stated need to allow wildlife species to utilize more contiguous habitats. 6330 also bisects some designated critical habitat for the Northern Spotted Owl in its upper reaches and 6341 enters deep into the critical habitat unit. Reducing the road density in NSO critical habitat will improve nesting and foraging habitat by reducing disturbances from vehicles.

Roads 7040 and 7030: Restoring these roads would go a long way toward restoring the Nohorn Creek watershed and provide a valuable wildlife corridor heading downstream from the Opal Creek Wilderness. This would reduce disturbance in an area that stretches from higher elevation to lower elevation which will be important for wildlife as they adapt to shifting habitats in a changing climate. A seasonal road closure here is inappropriate for the same reasons discussed above. These roads also enter deep into designated critical habitat for the Northern Spotted Owl and reducing the road density would improve nesting and foraging habitat by reducing disturbances from vehicles.

Road 7021: Due to the location of this road it is a prime candidate for closure. 7021 is located directly adjacent to Bull of the Woods Wilderness and intact/undistrubed wildlife habitat. Decommissioning this road would increase terrestrial habitat within this late successional reserve. A seasonal road closure here is inappropriate here for the same reasons discussed above. This road also enters deep into designated critical habitat for the Northern Spotted Owl. Reducing the road density would improve nesting and foraging habitat by reducing disturbances from vehicles within critical habitat.

Road 4640: This road is in an area of extremely high road density. Decommissioning this road would be particularly beneficial in reducing the road density within close proximity to the Clackamas River. Road 4640 and associated spurs also enter into important winter ranger for deer and elk. A seasonal road closure here is inappropriate for the reasons discussed above. Furthermore this road passes through areas of concern for landslide (earthflows). Reducing road density in this earthflow area will reduce the chance that landslides off the 4640 could adversely impact water quality. This road also enters designated critical habitat for the Northern Spotted Owl. Reducing the road density would improve nesting and foraging habitat by reducing disturbances from vehicles within critical habitat, and be consistent with the agencies obligations under the Endangered Species Act.

We look forward to working with the Forest Service and participating in this process to ensure the effective implementation of road decommissioning efforts. Please contact me if you would like further discuss the issues we have raised.

Sincerely,

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