* Cascade Forest Conservancy * Washington Trails Association * WildEarth Guardians *

November 21, 2016

Gar Abbas, District Ranger and Ruth Tracy, Project Team Leader
Cowlitz Valley Ranger District – Gifford Pinchot National Forest
P.O. Box 670
Randle, WA 98377-9105

Re: 2016 ERFO-3 Scoping Notice; File 1950/7700

Dear District Ranger Abbas and Team Leader Tracy,

Thank you for the opportunity to provide comments on the scoping notice for the "ERFO-3 Road Project" in the Cowlitz Valley Ranger District. As conservation and recreation focused non-profit organization's we have a strong interest in current and future management activities since our supporting members live, work and play in and around the Gifford Pinchot National Forest (GPNF).

We do support ecologically-sound repair of roads that are needed, particularly those that access recreation sites.

We are aware of the many challenges the U.S. Forest Service faces with it's oversized and undermaintained road system and have worked to help address some of the funding challenges. The agency's road system was built decades ago - financed nearly 75% by federal appropriations - to support large-scale timber harvesting. Today, the road network continues to support forest management activities but also supports a strong recreation economy with at least 63% of Washingtonians participating in outdoor activities each year generating $1.6 billion in local and state taxes[1]. But road budgets do not support this change in use as funding levels dropped to 18% of what they were in 1990. The Forest Service is overwhelmed by significant management and ecological problems related to this deteriorating infrastructure. Limited dollars seem to get directed to roads for timber management rather than recreational access. And, as each winter demonstrates, the road system is extremely vulnerable to storms. We recognize the need to make decisions to adapt to modern day recreational interests, historical tribal and cultural needs, while also reducing aquatic and terrestrial impacts and lining up with realistic budgets. We appreciate your effort in working towards this balance.

When roads fail, we understand the impacts to communities, recreationists and water quality. Access to public land is thwarted, streams receive a large input of sediment and resident/anadromous fish are injured. Because the Forest Service has a larger road system then funds can support, these problems only get worse.

This project seems to address recent some of these impacts. As described in your announcement the project's purpose is to "repair twenty-one road sites damaged in the December 2015 flood" and the need is to "address multiple resource concerns, public access and access for management purposes." It is always challenging to provide input at the scoping stage, when little information is provided, so our comments are more general in nature.

[1] Outdoor Industry Association. The Outdoor Recreation Economy FactSheet. 2012.

[2] Forest Service Manual 7712 and Forest Service Handbook 7709.55, Chapter 20 provide detailed guidance on conducting travel analysis.

[3] The requirements of subpart A are separate and distinct from those of the 2005 Travel Management Rule,

The December 2015 flood had a devastating impact across the Gifford Pinchot National Forest. We are happy to see that Forest Service staff worked hard to obtain ERFO funding to help repair some of the damage from these storms. We understand that there are numerous requirements associated with ERFO funding, requiring staff time and proper documentation. We appreciate these efforts.

As this project moves forward, we ask that strong Best Management Practices (BMPs) be employed to ensure that water quality and aquatic habitat be protected. The two sites that are in streams occupied by resident fish and the six that are within half a mile of anadromous habitat should have BMPs installed and routinely monitored to reduce risk to the species. In addition, at the sites that are within nesting and roosting habitat of the northern spotted owl or within dispersal habitat of the owl, extra precautions should be taken to eliminate harm.

According to the GPNF Travel Analysis Report (TAR) from September 2015 for these road segments the risk to aquatics ranges from a low of 2 to a high of 16. Three segments are rated low, one is rated high, and the rest are rated as moderate risk to aquatics. As stated above, all project activities should reduce or minimize aquatic risk.

We also recommend that the GPNF analyze how these road projects will result in reduced road densities, reduced risk of mass wasting/landslides, specific improved road/trail maintenance and ultimately result in tangible improvements to aquatic habitat and watershed conditions. At a glance, the road densities in this area seem high and potentially detrimental to terrestrial and aquatic species. When the projects are completed, will the road densities and overall health of these watersheds change in a positive direction?

The TAR also identifies all road segments in this scoping notice as needed for vegetation management and public interest. Only one road (FR#25) is considered needed for recreation, according to the TAR. Though the process used in the Travel Analysis Process to label a road "public interest" can be disputed, we do share a common believe that roads that access recreational sites should be maintained and improved to ensure access. It appears that FR#25 and FR#26 are included for repairs and these do provide important access to recreational facilities and trails. However, it is unclear, in the scoping notice, what specific recreational sites the other roads access and ask that this be clarified. To be clear, we support adequate stormproofing on roads that are needed for recreation to ensure these important roads can withstand storms so that access continues.

Re-evaluate roads identified as needed and consider additional decommissioning opportunities.

Subpart A of the Roads Rule directs each National Forest to conduct "a science-based roads analysis," generally referred to as the "travel analysis process" 36 C.F.R. § 212.5(b)(1).[2] Based on that analysis, forests must first "identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands." 36 C.F.R. § 212.5(b)(1). Forests must then "identify the roads . . . that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails." *Id.* § 212.5(b)(2).[3] The scope of this project may be too limited to properly identify

[2] Forest Service Manual 7712 and Forest Service Handbook 7709.55, Chapter 20 provide detailed guidance on conducting travel analysis.

[3] The requirements of subpart A are separate and distinct from those of the 2005 Travel Management Rule, codified at subpart B of 36 C.F.R. part 212, which address off-highway vehicle use and corresponding resource

the minimum road system but there may be additional opportunities, initially overlooked, for additional road decommissioning. For example, road #2200043 was considered as "single purpose road" in the Travel Analysis Report. Given its limited need and high risk to stream crossings and adjacent riparian areas, it may help the forest move towards a more fiscally sustainable road system by decommissioning this road, instead of repairing it. The GPNF estimates a deferred maintenance need of $53.3M. With every project, there is a need to balance access needs with resource protection and existing budgets. Consider whether there may be additional opportunities to achieve a greater balance.

Consider climate change impacts and adaptation recommendations.

Climate change intensifies the adverse impacts associated with roads. As the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience.[4] Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads, however, were poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations. And, even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance needs.[5]

The USFS Pacific Northwest Research Station published a report titled "Climate Change Vulnerability and Adaptation in the North Cascades Region, Washington" (September 2014). The report describes the probable impacts resulting from changing climate and states:

> "Hydrologic systems will be especially vulnerable as North Cascades watersheds become increasingly rain dominated, rather than snow dominated, resulting in more autumn/winter flooding, higher peak flows, and lower summer flows. This will greatly affect the extensive road network in the North Cascades (longer than 16 000 km), making it difficult to maintain access for recreational users and resource managers. It will also greatly reduce suitable fish habitat, especially as stream temperatures increase above critical thresholds." (Abstract, p.1).

The abstract also highlights recommendations to prepare for such changes, namely:

> "For roads and infrastructure, tactics for increasing resistance and resilience to higher peak flows include installing hardened stream crossings, stabilizing streambanks, designing culverts for projected peak flows, and upgrading bridges and increasing their height. For fisheries, tactics for increasing resilience of salmon to altered hydrology and higher stream temperature include restoring stream and floodplain complexity, reducing road density near streams, increasing forest cover to retain snow and decrease snow melt, and identifying and protecting cold-water refugia." (Abstract, p.2)

We recommend you consider climate change impacts and adaptation recommendations. Some of these

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damage pursuant to Executive Orders 11,644, 37 Fed. Reg. 2877 (Feb. 9, 1972), and 11,989, 42 Fed. Reg. 26,959 (May 25, 1977).

[4] USDA, Forest Service, *National Roadmap for Responding to Climate Change*, at 26 (2011), *available at* http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf

[5] USDA, Forest Service, *Water, Climate Change, and Forests: Watershed Stewardship for a Changing Climate*, PNW-GTR-812, at 72 (June 2010), *available at* http://www.fs.fed.us/pnw/pubs/pnw_gtr812.pdf.

roads are right next to major rivers and streams – increasing their vulnerability. In addition, with the culvert upgrades, we strongly suggest that culverts be designed to handle high flows and associated debris (Q100 plus debris). Replacing an existing sized culvert with the same size, simply means the Agency will soon have another washed out road to deal with.

Conclusion

To be clear, we support the direction this project is headed, with the limited information we have in hand, at the moment. Addressing road issues is one of the most beneficial actions the Forest Service can undertake, not only for watershed health, salmonid health, but also to ensure people can continue to visit and use key areas of the forest. The road system is becoming more fragile with each passing storm. We appreciate the hard work staff have undertaken to obtain ERFO support and their work to ensure access on the National Forest while also working to protect natural resources. A thoughtful, strategic approach can achieve positive results and move us closer to the goal of a "Sustainable Road System". We are available for further discussion, if warranted.

Sincerely,

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