

Appendix D: Response to Comments

The proposed action along with a preliminary assessment (which included the need for the proposal, the alternatives considered, and the environmental consequences) was made available for public comment (36 CFR 215, 5/13/03). Letters and e-mails were received during the 30-day comment period, which ended on November 17, 2008. The Responsible Official has considered comments received and has developed the Road Decommissioning for Aquatic Restoration Environmental Assessment in response to those comments.

This appendix responds to comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider (36 CFR 215.2). The emails and letters are in the analysis file; the following is a summary. In the responses, section numbers refer to the Environmental Assessment unless otherwise specified.

Issue	Public Issue Statement	Response
Recreation	<p>I am supportive of Alternative 3 because it allows continued access to Bulo Point from the north on the 2730240 road. Please consider the public safety of using any outdoor climbing area.</p> <p>The more roads that are closed, the more problems with four-wheelers.</p>	<p>Alternative 3 was specifically included in the analysis to maintain driving access (as compared to hiking trail access in Alternative 2) for ease of accessibility for both climbers and emergency vehicles.</p> <p>It is unclear as to what specific “problems” the commenter is referring to with four-wheelers. However, there are approximately 2381 miles of single-lane, gravel road on the Forest open to off-highway vehicles (OHVs). Additionally, there are 58 miles of trail designated for OHV use. This project proposes to close less than one percent of the roads currently open to OHV; therefore, no significant impacts to OHV riders or other recreationists are expected. Currently, the Forest is working on a forest-wide project that proposes to designate routes and trails open to OHVs. For more information about OHV planning on the Forest, please refer to the Forest’s website at http://www.fs.fed.us/r6/mthood/projects/.</p>

Issue	Public Issue Statement	Response
	<p>The Mt. Hood Summer Ski Camp has used the general area in the Upper Salmon River subwatershed for hiking, x-country skiing, trail running and mountain biking for the past ten years. Using the 2600011 road allows the athletes at the Mt. Hood Summer Ski Camp to stay off and away from Highway 26. We recommend that you “passively decommission” this road, or take no action, or convert to trail.</p>	<p>This request will be considered at the time the decision is issued.</p>
	<p>There is no rationale or context provided as to why 4-5 miles are being considered for conversion to recreational trails. Would the roads being considered connect to an already existing trail system? What kind of recreational uses would the trail be appropriate for?</p>	<p>Additional information has been added to the EA on page 7 explaining how 4-5 miles of roads became proposed for conversion to a non-motorized trail.</p>
<p>Road Decommissioning</p>	<p>I see no reason to close roads in the Fifteenmile and Fivemile headwaters. There is no aquatic danger on these roads.</p>	<p>No roads are being proposed for closure in this project in the Fivemile subwatershed.</p> <p>One of the primary purposes of this project is to reduce risks to water quality and riparian function from roads, which is why this project is focused in “high priority” watersheds (EA pp. 4-6). Another purpose of this project is to reduce maintenance costs for the miles of unneeded roads on the Forest (EA pp. 5-6). Therefore, there may be some roads proposed in the project that do not have a <i>high</i> aquatic risk, but have a low access need.</p>

Issue	Public Issue Statement	Response
	<p>We asked for detailed descriptions for each culvert replacement. We expect to see recommended prescriptions for culverts and roads when the decision is released.</p>	<p>Alternative 2 (Proposed Action) does not propose to <i>replace</i> any culverts. In fact, in the EA on page 7 it states that culverts would be <i>removed</i> for any decommissioned road where natural drainage needs to be restored. The only road proposed in this project (in Alternative 3) that would need repairs is the 2730240 in Headwaters Fifteenmile Creek Subwatershed. In the EA it states, "This northern segment of the road would be improved as needed to mitigate current adverse impacts to hydrologic function" (p. 17). Currently, however, no culverts exist on this portion of the road. If this alternative is selected, then upon time for implementation, a hydrologist and engineer will assess if any culverts should be added and their specific location.</p> <p>Road decommissioning activities are outlined in the EA on pages 15-17. Road decommissioning activities would include all of the Project Design Criteria discussed in the EA on pages 18-23, as well as Water Quality Best Management Practices (EA p. 42).</p>
	<p>It is confusing as to whether or not the 4610046 road in Linney Creek is being proposed for decommissioning or not.</p>	<p>The 4610046 road is not proposed for decommissioning. There was an error in the map used with the scoping letter, which indicated that this road was proposed for decommissioning. This error was corrected in the map used for the 30-day comment period.</p>
<p>National Environmental Policy Act / National Forest Management Act / Planning</p>	<p>There is virtually no rationale for how the Forest Service decided upon the significant issues and how and why these issues appeared as they did in the proposed actions.</p>	<p>A discussion regarding issue development and significant and non-significant issues can be found in the EA on pages 11-12.</p>

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	<p>What were the trade-offs the Forest Service weighed in deciding the preferred alternative? Was it determined that the ecological impact outweighed the demand for access or did the maintenance costs outweigh other factors? Without answers to these questions, the preferred alternative appears arbitrary.</p> <p>Attached is the proposed amendment to the Forest Service Handbook, FSH 7709.55 Travel Planning, Chapter 20. It explains how “travel analysis” should be used. While it appears based on actions by Mt. Hood National Forest that this process is discretionary, the Handbook direction at 21.2 is very clear, “Responsible officials shall participate in travel analysis.”</p>	<p>No alternative in this project has been identified as “preferred.”</p> <p>Additional information has been added to the EA on page 6 further explaining the development of Alternative 2 (Proposed Action).</p> <p>The document enclosed in this comment letter is “proposed” and has not superseded current FSH guidance. The current FSH 7709.55, Chapter 20 (dated January 28, 2005) provides guidance specifically for transportation planning in the development of Forest plans (36 CFR 219.12). The Mt. Hood National Forest has not yet started the Forest Plan revision process, and therefore guidance in FSH 7709.55, Chapter 20 is not applicable for this project.</p>