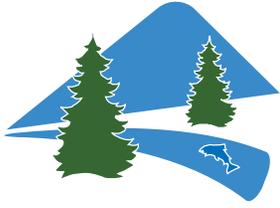


*Restoring the Watershed,
-Putting people to work*



Clackamas Stewardship Partners

Wesley Wong, Restoration Biologist
Mount Hood National Forest
595 NW Industrial Way
Estacada, OR 97023

April 17, 2009

RE: Clackamas Road Decommissioning for Habitat Restoration

Dear Wes:

Thank you for the opportunity to comment on the Clackamas Road Decommissioning For Habitat Restoration proposed action. The Clackamas Stewardship Partners (CSP) is a group of diverse stakeholders dedicated to restoring ecological function of the Clackamas River Basin while benefiting local economies. We have ranked road decommissioning as a high priority restoration activity to improve fish and wildlife habitat, water quality, and create quality local jobs and therefore we support the proposed action, Alternative B. Our comments and recommendations on the proposed action are below. CSP appreciates the dedication of the Mount Hood National Forest to examine all of its watersheds for restoration opportunities and specifically the Clackamas River Ranger District in their work to appropriately analyze and take action to decommission unneeded roads in the Clackamas River Basin.

CSP is supportive of the purpose and need, particularly with the expansion from the initial scoping letter, of reducing road density to improve terrestrial habitat and reducing the spread of non-native invasive plants associated with roads. The proposed action details a variety of treatment methods to decommission roads ranging from removing the road from the transportation system via records management to reestablishing vegetation and restoring ecological processes. After reviewing Appendix A, it appears that 54% of the road miles will be decommissioned through entrance management, 17% through records management, and 29% through stabilization. CSP recommends significantly more roads treated with stabilization techniques and strongly support active decommissioning to reestablish vegetation and restore ecological processes. A lower priority for stabilization treatment can be placed on roads that have significant vegetation re-growth, are hydrologically stable, and not a terrestrial priority. In addition, active decommissioning compared to records and entrance management provides a greater number of quality local jobs. Therefore a greater emphasis should be placed on this type of treatment.

The proposed action details that the treatment strategies were determined based on a variety of factors. After reviewing some of these factors in the rapid assessment tool prepared for CSP it appears that some roads that have sediment delivery to fish-bearing streams were not prioritized for stabilization treatment, but instead entrance and records management (i.e., 4220027, 4200480, & 4220130). We want to emphasize the importance of active decommissioning to restore ecological processes particularly where there are known risks.

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CSP is also interested in monitoring and adaptive management. We are pleased to see a discussion of utilizing adaptive management and monitoring to ensure effectiveness, prohibit motorized vehicle traffic and facilitate restoration to a more natural, forested landscape. The document doesn't necessarily connect the two concepts. For example on page nine where it states that "exact treatment details and the priority for that road may be adjusted at the time of implementation based on factors such as," and then proceeds to list these factors, there is no mention of utilizing information from monitoring effectiveness of treatment and how this information works to influence future treatment through adaptive management. We believe a factor should be added specifically mentioning utilizing monitoring information collected on treatment effectiveness. In addition, we want to see a monitoring plan initiated in years one and three post implementation to determine if the purpose and need was achieved with individual treatment types. The CSP may be interested in working with the district on developing and implementing this monitoring plan.

In future environmental assessments regarding road decommissioning we would like to see a description of treatments for individual road segments. We understand the importance of retaining flexibility with treatment and focusing on outcomes to achieve the purpose and need, but we would like a better balance with accountability and describing specific treatments.

CSP thinks that the comparison of alternatives table listed on page 20 is somewhat confusing because if the proposed action is to decommission 129 miles of road the resulting road system should be 129 miles less than the no action alternative. Is the difference because of roads that aren't on the system? Can you please clarify this in the environmental assessment?

In conclusion, we would like to thank the Clackamas River Ranger District for your work on the Clackamas Road Decommissioning For Habitat Restoration proposed action and look forward to working with you on restoration of the Clackamas River Basin. Please contact us with any questions you may have.

Sincerely,

Lisa Moscinski

Lisa Moscinski
Clackamas Stewardship Partners