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January 11, 2008

VIA EMAIL AND FIRST CLASS MAIL

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Re: Scoping comments for the Clearwater National Forest travel planning EIS

Dear Ms. Foster:

Thank you for the opportunity to comment on the scope of the Clearwater National Forest's Travel Planning Environmental Impact Statement. We encourage the Forest to engage in a process designed to address the widespread degradation of aquatic ecosystems caused by the road system. The travel management planning process should address not only off-road vehicles and designation of routes open to motorized use, but also specifically how the Clearwater National Forest will achieve a road system that minimizes environmental impacts, and that the Forest Service can properly manage within its funding constraints.

As you know, the U.S Forest Service Roads Policy, developed in 2001, has the potential to provide a much needed framework for addressing the widespread degradation to aquatic ecosystems caused by roads. Specifically, 36 CFR § 212.5(b)(1) requires the responsible official for each national forest to identify the minimum road system needed consistent with long-term funding expectations and minimizing adverse environmental impacts from the roads system. Responsible official for each forest must also identify unneeded roads for decommissioning or for other uses such as trails. 36 CFR § 212.5(b)(2).

The Roads Policy rule requires the responsible officials for each forest to use a science-based roads analysis to determine the minimum roads system. The Clearwater National Forest's roads analysis clearly indicates that the roads system currently far exceeds a system that is financially sustainable. Therefore, the roads system must be drastically reduced. The roads analysis also states that it does not specify where any new road will be built or decommissioned; the Forest evidently intended to make those decisions through a NEPA process. As the Forest is now engaging in such a NEPA and planning process, this would be the appropriate time to make these decisions.

The 2005 Travel Management Rule requires designation of roads open to motor vehicle use. This designation must be consistent with the information in the roads

analysis and the Roads Policy Rule at 36 CFR § 212.5(b). In other words, the Clearwater National Forest must only allow motor vehicle use designations on roads that the roads analysis indicates can be maintained consistent with long-term funding expectation and will minimize environmental impacts.

The following is a list of issues that the Forest should address in the EIS:

- Is there a comprehensive transportation atlas? Does it include roads that were formerly designated as “unclassified”? If not, how does the Forest keep track of these roads? How can the Forest justify building any new roads if it has not documented already existing roads, whether “authorized,” or “unauthorized,” as defined by the Travel Management Rule?
- Was a minimum road system determination already done? If not, why not? Any current proposal must explain how any designation would be consistent with the minimum road system determination, or, if the proposal is to increase the minimum road system, how is this consistent with the roads analysis?
- Have old, unused roads been adequately considered? There is no basis for allowing establishment of new routes when there are still old roads causing damage.
- Have the impacts of level 1 and 2 roads been adequately considered?
- Does the proposal protect refugia for imperiled species?
- Will there be concrete goals for road decommissioning in the action? If there are no goals, how can the Forest ensure it will actually achieve a minimum roads system?
- How will the Forest track road density, including non-system roads, in connection with this proposal?

We hope that the Clearwater Forest will use this travel management planning process as a real opportunity to make significant headway in reducing the aquatic impacts of roads on the Forest, including by limiting the road system to one that can be properly maintained under its budget.

Thank you for your consideration.

Sincerely,

Bronwen Wright  
Policy Analyst