

Section 4: Transportation System Management

ROAD MANAGEMENT	
PC 572	The Forest should consider the conflicts that existing and planned roads create, including conflicts with hunting, recreation, fishing, and wildlife.
Response:	The EIS focuses mainly on the general impacts that roads have on other resources, including wildlife. Roads provide access for recreationists, including hunters and anglers, and roads are generally not viewed as a conflict with recreation unless the recreation is occurring in a roadless area. We did consider the effects from existing roads in the roadless area inventory process and wilderness evaluations that we completed for Appendix C to the EIS.
PC 572a	INCLUDING WHETHER ROAD DENSITIES ARE CURRENTLY EXCEEDED IN MANAGEMENT PRESCRIPTION OR OPPORTUNITY AREAS
Response:	The Revised Forest Plan no longer has opportunity areas. Road density in Management Prescription areas is one of the criteria to be considered for identifying and prioritizing road decommissioning. See Guideline RF09, part C, in the Proposed Revised Plan. We have also added goals in certain Management Prescriptions in the Revised Plan to address road reduction where we feel there may be a need. However, we are not making any road-specific decommissioning decisions in plan revision.
PC 568	The Forest should provide an adequate assessment of the cumulative impacts of the forest road system.
Response:	The Road Transportation System section in Chapter 3 of the EIS presents cumulative effects to the road system, focusing primarily on Forest roads, but discussing other public or private roads as well. Other sections of Chapter 3 describe the general effects that roads have on their specific resources. Effects are not limited to Maintenance Level 3-5 roads, but typically include all roads affecting the resources within a given area, often the area within the Forest's proclamation boundary for cumulative effects.
PC 109	The Forest should revise its road management plan.
PC 109a	BECAUSE THE AVERAGE CITIZEN HAD NO INPUT INTO THE CURRENT PLAN
Response:	The Roads Analysis Report (2003) was not a NEPA document, requiring public involvement and road-specific decisions. It was an internal exercise designed to provide the current status of the Level 3, 4, and 5 roads on the Forest, including known hazards or concerns that should be addressed in watershed and project-level planning.
PC 109b	BECAUSE MORE ROADS NEED TO BE CLOSED SINCE MANY ROAD MILES ON THE FOREST CANNOT BE MAINTAINED TO STANDARD
Response:	We agree, which is why the Roads and Facilities section in the Draft Forest Plan has management direction devoted fully or partially to road decommissioning or closures. See, for example, Goal RF02, and Guidelines RF08, RF09, RF11, and RF20.
PC 109c	BECAUSE THE CURRENT PLAN LACKS ADEQUATE GUIDANCE
Response:	The Roads Analysis Report (2003) was not intended to provide guidance, but rather comprehensive information about roads that can be used to help formulate road management guidance and inform project-level decisions. The Revised Forest Plan provides guidance on road management through Forest-wide and Management Prescription direction for roads in Chapters II and III.
PC 109d	BECAUSE A ROAD SYSTEM SHOULD BE WORKED OUT BEFORE THE PLAN IS COMPLETED TO IDENTIFY THE MINIMUM ROAD SYSTEM NEEDED ON THE FOREST
Response:	The road transportation system on the Forest is an ongoing and evolving process. Any road-specific decisions made at the forest planning level would have to be revisited, re-analyzed, and redistributed for public comment at the project level, so we have chosen to make those decisions at the project level where site-specific information can be more appropriately applied.
PC 109e	TO REDUCE ILLEGAL ALL-TERRAIN VEHICLE USE
Response:	Illegal ATV use is a law enforcement problem that the Forest is addressing on an on-going basis. No report or plan can by itself reduce illegal use. The Forest Plan does include direction that describes that ATV use may only occur on designated routes.
PC 565	The Forest should provide an explanation of how they intend to manage roads and trails.
PC 565a	INCLUDING THE STATED "ADMINISTRATIVE USE" OF CLOSED ROADS AND TRAILS
Response:	Administrative use is primarily use by Forest personnel for such activities as fire suppression,

	inventories, monitoring, and project implementation. It may also include use by permittees, contractors, or cooperators, if not explicitly stated. Administrative use is typically very low in areas where projects are not being planned or implemented, or special uses are not in effect, but may be considerably higher in areas where they are.
PC 565b	INCLUDING THE 60 PERCENT OF ROADS THAT ARE NOT MAINTAINED TO THE SAFETY AND ENVIRONMENTAL STANDARDS FOR WHICH THEY WERE DESIGNED
Response:	The DEIS, page 3-417, specified that an estimated 48 percent of Level 3, 4, and 5 roads are currently not being maintained to standard. The EIS Road Transportation System analysis also describes a variety of factors that affect our ability to maintain roads, not all of which are under our control. As a result, roads are typically maintained on a priority basis, depending on safety, resource protection, and user comfort needs.
PC 565c	INCLUDING HOW IMPACTS FROM USER-CREATED AND UNAUTHORIZED ROADS WILL BE REDUCED
Response:	Unauthorized user-created roads can be physically closed to motorized access and rehabilitated as appropriate and needed. However, closing existing roads is not necessarily going to stop the creation of new unauthorized roads. Law enforcement and rehabilitation efforts will continue, but specific impacts and how they will be reduced cannot be accurately predicted at this time or at the forest planning scale.
PC 565d	TO COMPLY WITH THE FOREST SERVICE'S ROADS POLICY
Response:	We believe we are in compliance with Forest Service Roads Policy.
PC 565e	INCLUDING DETERMINING THE MINIMUM ROAD SYSTEM NECESSARY FOR SAFE AND EFFICIENT TRAVEL, ADMINISTRATION, UTILIZATION, AND PROTECTION OF FOREST SERVICE LANDS
Response:	See response to PC 109d.
PC 565f	INCLUDING PROVIDING A GENERAL MILEAGE TARGET FOR DECOMMISSIONING ROADS IN THE ABSENCE OF MORE DETAILED PLAN FOR ROAD MILES TO BE DECOMMISSIONED
Response:	We have added a general objective for road decommissioning mileage in the Revised Forest Plan.
PC 565g	INCLUDING PROVIDING A PLAN FOR ROAD REMOVAL AND UNROADED FOREST BLOCK CONSERVATION AT THE FOREST LEVEL
Response:	The revised Forest Plan has direction for road decommissioning. Appendix C to the EIS describes the roadless areas that would provide relatively unroaded blocks on the Forest, along with existing Wilderness and some of the Forest special areas (MP 8.0).
PC 565h	INCLUDING CLARIFYING WHETHER YOU WILL PRIORITIZE THE DECOMMISSIONING OF ROADS IN THE UPPER END OF WATERSHEDS THAT CURRENTLY HAVE LOW ROAD DENSITIES
Response:	Guideline FR09 in the Proposed Revised Plan describes priorities for road decommissioning. The situation you describe would fall under part D of FR09.
PC 565i	INCLUDING CLARIFYING WHETHER YOU WILL ACCURATELY ASSESS THE COST OF ROAD MANAGEMENT AND REDUCE THE OVERALL ROAD NETWORK TO ONE THAT CAN BE MAINTAINED WITHIN BUDGETARY LIMITS AND WHICH IS MORE ECOLOGICALLY FUNCTIONAL
Response:	The Forest assesses the costs of road management on an annual basis. As described in the Road Transportation System analysis in Chapter 3 of the DEIS, we cannot accurately predict what the overall road network will be in the future due to the many variables and unknowns involved. We have added a Forest-wide objective and management prescription goals for road decommissioning in the Final Revised Plan.
PC 565j	INCLUDING CLARIFYING WHETHER YOU WILL ENSURE THAT THERE IS NO NET INCREASE IN ROADS IN UNROADED AREAS OVER 1,000 ACRES
Response:	The revised Forest Plan has general prohibitions on new road construction in Management Prescriptions 5.1 and 6.2, which comprise all of the roadless areas on the updated Roadless Area Inventory. However, even these "roadless areas" have existing roads within them. There are no other unroaded areas over 1,000 acres in size.
PC 565k	INCLUDING ASSESSING THE IMPACTS THAT ROADS HAVE ON FOREST RESOURCES AND PROVIDING ADEQUATE MONITORING AND MITIGATION MEASURES
Response:	The EIS assesses general impacts from roads on forest resources, and the Revised Forest Plan has both

	monitoring and mitigation measures (in the form of standards and guidelines) for road impacts.
PC 236	The Forest should include "woods roads" in the road densities because they have the same environmental effects as properly recognized roads.
Response:	Woods roads are unauthorized roads that present a challenge to Forest planning and management efforts. These are roads that are usually user-created and have not been properly designed, constructed, or maintained for vehicle use. Where the roads still have vehicle traffic, there can be effects similar to those seen on Forest system or authorized roads. In other cases, these roads are becoming woods again, and we would create more disturbances by obliterating them than by just allowing natural reclamation to occur. There may be roads that we have yet to discover, and there are likely roads depicted on old maps that have long since disappeared. In either case, it would be impossible or inappropriate to map and include them in road density estimations. We did not include woods roads our EIS analysis or in road density calculations for reasons given on page 3-412 of the DEIS. However, as described on page 3-413, we do have a strategy for addressing woods roads during project planning, and we have management direction in the Revised Forest Plan that reflects this strategy.
PC 570	The Forest should provide direction given in all management prescriptions for maximum road density as standards, not as guidelines, and areas should be prioritized for decommissioning of unneeded roads where road density exceeds the maximum.
Response:	We believe that guidelines will provide more flexibility at the project level to adjust over time to access needs (private mineral rights, special uses, etc.) that are unknown at this time. However, we have added direction to the Revised Forest Plan that will help us prioritize areas where decommissioning may be needed. For example, see the new Transportation System Planning objective in MP 4.1.
PC 566	The Forest should include existing roads and trails in assessing compliance for detrimentally disturbed conditions.
Response:	Direction for the assessment of Forest Service roads and disturbance with regard to soil productivity comes from the Forest Service Handbook 2509.18, p. 6. "Temporary roads used for vegetation management are included as areas evaluated for soil quality. System road and trails, on the other hand, and other administrative facilities within or adjacent to the activity area, are dedicated land uses and not considered detrimental soil conditions." In other words, system roads are not considered a detrimental disturbance to soil productivity because the land they occupy has been dedicated to a use that assumes the soil is no longer productive for growing trees. However, the effects of system roads, including effects on soil productivity, are still analyzed under the NEPA process for appropriate projects. In addition, all roads (open, closed, authorized, and unauthorized) are considered at the watershed and project levels when we look for opportunities to provide the minimum transportation system needed to meet resource and use objectives. See Goal RF02 and Guideline FR09 in the Roads and Facilities section of Chapter II in the Proposed Revised Forest Plan.
PC 365	The Forest should provide adequate roads for fire and other protection.
Response:	We agree, and as stated in the DEIS, page 3-419, most of Forest's road needs for the current level of use are already in place. Road management over the coming planning period will likely be a matter of fine-tuning; upgrading the system we have, providing for identified needs, and removing unauthorized or unwanted roads from the system or landscape.

ROAD CONSTRUCTION AND MAINTENANCE	
PC 567	The Forest should consider maintaining roads if closing existing corridors would negatively impact watersheds
Response:	All authorized roads on the Forest are maintained to an assigned level. However, maintenance on Level 1 and 2 roads may be very infrequent, and some impacts to watershed resources may occur between or even during maintenance operations.
PC 361	The Forest should consider building new roads if needed for public access.
Response:	As stated in the Road Transportation System in Chapter 3 of the EIS, we feel that most of our access roads are already in place. However, this does not mean that we would not consider additions or

	replacements to the system if there is an identified need.
PC 24	<p>The Forest should build no new roads in the Forest:</p> <ul style="list-style-type: none"> • To protect wildlife habitat • To protect wilderness qualities • To save taxpayer dollars • To reduce road maintenance needs • To protect water resources • To prevent excessive commercial uses of the Forest • To reduce littering • To reduce noise pollution • To reduce air pollution • To reduce poaching of wildlife • To prevent deterioration of Forest land • To prevent invasive plant species • To prevent increased logging • To prevent forest fragmentation • To prevent erosion and sedimentation.
Response:	Road management is a delicate balance between providing for management and enjoyment and legal access of public lands, and keeping the impacts from road construction and use at acceptable levels. Chapters II and III of the Revised Forest Plan describe many areas where new road construction is prohibited or limited, and provide a lengthy list of management requirements to control the potential impacts of new and existing roads. See also responses to PC 198.
PC 198	The Forest should limit road building in the Forest.
Response:	We recognize that, even though roads are needed on the Forest for recreation, management, and to access private property or rights, they do have impacts. Therefore, we try to limit the amount of road building on the Forest, and we apply mitigation to reduce impacts where roads are built. For example, many of the roads on the Forest have been built in the past for timber harvest purposes. We expect to continue to harvest timber, but we will look for ways to reduce the amount of roads needed for this activity through the use of existing roads, the use of helicopter logging, and the use of temporary roads that can be closed and restored after harvest. We also will look for opportunities to decommission or obliterate existing roads. See the Road Transportation Section in Chapter 3 of the EIS for a more detailed discussion of road management.
PC 198a	TO PROTECT WATER RESOURCES, TROUT, WETLANDS, AND SOIL
Response:	The Proposed Revised Plan includes direction to protect water, soil, wetlands, and aquatic habitat from the impacts of road building. Many are noted below, but others may be found in Chapter II of the Revised Plan, primarily in the sections for Soil and Water, Wildlife and Fish, and Roads and Facilities.
PC 198b	TO PREVENT FLOODING
Response:	We agree that excessive road building, particularly adjacent to streams, can exacerbate the effects of flooding. However, flooding occurs when precipitation greatly exceeds the land's capacity to absorb it, and there is little we can do to prevent those types of events. We do have management direction in the Plan that limits road building and associated activities within riparian areas. See Standards SW40, SW44, SW45, SW46, and Guideline SW62 in the Proposed Revised Plan.
PC 198c	TO PREVENT EROSION
Response:	Similar to flooding, erosion is a natural process that we cannot prevent. However, we do have management direction in the Proposed Revised Plan that is designed to reduce erosion from road building and associated activities, including Standards SW03, SW04, SW05, SW35, SW36, RF06, and Guidelines SW11, SW14, SW16, and SW19.
PC 198d	INCLUDING NO ROAD BUILDING IN ROADLESS AREAS, MP 6.2 AREAS, MP 5.1 AREAS, AND EXISTING WILDERNESS
Response:	Management Prescriptions 5.0, 5.1, and 6.2 have general restrictions on new road construction, and 5.1 and 6.2 contain all of the roadless areas on the revised Roadless Area Inventory. See Chapter III of the Revised Forest Plan for road-related direction for these prescription areas.
PC 198e	TO PROTECT WILDLIFE

Response:	While remote and roadless habitats are important for a number of species, many other species do not require remote habitats, and many species benefit from the young forest and herbaceous habitats created by active management outside of backcountry and wilderness areas. The Revised Plan provides for a mix of remote, unmanaged and non-remote, managed habitats to meet the needs of a wide variety of species. Forest-wide direction provides extensive protection for threatened, endangered, sensitive, and other wildlife and plant species. This direction applies wherever these species occur, regardless of whether the land is allocated to management prescriptions emphasizing backcountry preservation or active vegetation management.
PC 198f	INCLUDING ROAD CLOSINGS WHERE POSSIBLE
Response:	The Proposed Revised Plan includes direction to close or decommission roads that are not needed for long-term management, including Goal RF02 and Guidelines RF08, RF09, RF11, and RF12. We have also added an objective for road decommissioning in the Final Revised Plan.
PC 198g	INCLUDING ROADS BUILT FOR TIMBER HARVEST PURPOSES
Response:	See general response to PC 198 above.
PC 170	The Forest should not allow logging roads to be built unless their entire costs, including long-term maintenance, are paid for.
Response:	We address road maintenance concerns in the Road Transportation section of Chapter 3 in the EIS. We are looking at alternatives to permanent road construction in many of our timber sale projects now, including using existing roads, helicopter yarding, extended skid trails, and temporary roads that can be returned to productivity after harvest.
PC 170a	INCLUDING LOGGING ROADS IN WILDERNESS AREAS
Response:	Management Prescription 5.0 (Designated Wilderness) has a general prohibition on new road construction.
PC 186	The Forest should not pave existing gravel roads because it detracts from the remote nature of the Forest, and many Forest roads are not designed for the higher speeds that paving would encourage
Response:	We are not proposing to pave any Forest roads in plan revision. These types of road-specific decisions are more appropriately made at the project level with site-specific information and public involvement.
PC 165	The Forest should close some existing roads: <ul style="list-style-type: none"> • Including seeding the closed roads for wildlife • Including removing roads from riparian areas • Including the upper basin road in East Fork of Greenbrier River Basin • Including collector roads that have been used to remove timber after all possible timber resources have been removed from that area • To reduce traffic • To protect the soil • To prevent illegal all-terrain vehicle use • To better focus on existing, unused roads that need to be maintained • To comply with the Forest Service's Roads Policy • To reduce siltation • To protect water resources • To prevent non-native invasive species.
Response:	We are not proposing to close any specific Forest roads in plan revision. These types of road-specific decisions are more appropriately made at the project level. However, the Revised Plan has direction for closing and decommissioning roads where and when appropriate in the Roads and Facilities section of Chapter II. The Final Revised Plan also includes a specific objective for road decommissioning.
PC 603	The Forest should only construct low maintenance roads using broad based dips instead of high crowned roads with ditches and culverts that never get cleaned.
Response:	We are not proposing to construct any Forest roads in plan revision. These types of road-specific decisions are more appropriately made at the project level, based on site-specific information such as terrain, road design, maintenance level, and projected use
PC 239	The Forest should provide information regarding road maintenance, including traffic volume data.

Response:	We do not have past traffic volume data for our roads, although we have now started to collect this information. The EIS statement cited in the comments was an observation based on the general consensus of people who have worked on the Forest for many years that there has been a gradual increasing trend in visitation.
PC 239a	INCLUDING WHAT PRIORITY MAINTENANCE IS BASED ON
Response:	Maintenance priorities are typically based on the Maintenance Level assigned, which takes into account user comfort. However, roads with immediate user safety or resource impact concerns often leap to the top of the priority list. Maintenance levels are described on page 3-416 of the DEIS.
PC 207	The Forest should consider the impacts that road maintenance has on habitat changes, including silting issues in the watershed, and fragmentation and disturbance caused by new and existing roadways.
Response:	The DEIS addresses these potential impacts on pages 3-79 and 3-124 through 3-125.
PC 139	The Forest should provide adequate drainage to roads to limit disruption to the Forest.
Response:	We agree. We apply road drainage structures to all improved roads on the Forest.
PC 241	The Forest should forego improving the maintenance conditions of roads unless it is proven that the watershed would be more impacted or mitigation would be cheaper because restoration of riparian areas should be favored.
Response:	This type of decision is more appropriately made at the site or project level, based on site-specific conditions and information, rather than in forest planning.
PC 378	The Forest should assist local companies in managing road construction to make it easier for companies to bid on timber.
Response:	Timber contract provisions and agency reimbursement policies are beyond the scope of plan revision.
PC 571	The Forest should apply the same standards for open roads to temporary and gated roads, because road density standards only apply to open roads.
Response:	Road density direction was originally designed to reduce disturbance to wildlife, and density direction was focused on collector and local roads that could be open or closed. For plan revision, we shifted the focus to open roads where public motorized use would create more disturbance. Road-related standards and guidelines for soil, water, and other resources apply to all roads, including temporary and gated roads. We do not agree that temporary roads—when designed, implemented, and rehabilitated correctly—have a permanent footprint on the landscape. However, we have added direction for temporary roads to clarify our management intentions in the Final Plan.
PC 343	The Forest should examine the feasibility of designating and creating new primitive areas by obliterating roads around the largest roadless areas, including protection of roadless and Semi-Primitive Non-Motorized areas.
Response:	The identification of roadless or Semi-Primitive Non-Motorized areas has to be based on current conditions rather than the possibility of obliterating roads in the future. Road decommissioning is part of the road management strategy in the Proposed and Final Revised Plans (see Chapter II, Roads and Facilities section). Therefore, it is feasible that the Forest may create additional roadless areas over time through road decommissioning. As explained in the Road Transportation System section of the EIS, however, individual road decommissioning decisions are inappropriate at the Forest planning scale because of the site-specific information, needs, and trade-offs that need to be considered.
PC 144	The Forest should acknowledge that taxpayers pay for roads in the Forest, not logging companies.
Response:	Although this subject is beyond the scope of plan revision, we acknowledge that road costs for timber sales factor into the overall returns to the U.S. Treasury, and indirectly the taxpayer. There is an overall benefit to the Treasury/taxpayer when timber harvested on federal lands results in a positive return. The degree of that benefit varies depending on, among other things, the cost of access to the timber, including road construction, and that cost will depend on the value of other resources that require protection. However, there is no return to the Treasury/taxpayer if there is no timber sale.
PC 242	The Forest should acknowledge that there are more important things to spend funding on than road improvement projects.
Response:	We acknowledge your preference. Roads are needed to access public and private lands within the Forest proclamation boundary, and improvements are needed to keep the roads safe and to reduce impacts to the environment.
PC 238	The Forest should acknowledge that unplanned travel ways and two tracks have the highest

	impacts on destroying resources, including silting streams, exposing soils to invasive species, and littering.
Response:	Effects from roads are disclosed throughout various resource sections in Chapter 3 of the EIS. Whereas unplanned travel ways and two tracks can have impacts on other resources, in some cases these roads have revegetated to an extent where they are having relatively little or any impacts, especially if they do not have culverts or other drainage structures associated with them that could fail over time.

TRAIL MANAGEMENT	
PC 576	The Forest should include a Comprehensive Trail Plan in the Forest Plan. <ul style="list-style-type: none"> • Including specific sections of the Forest for all-terrain vehicle usage • Including accommodations for bicyclists • Including a list of trails that are safe for horse traffic • Including creating a public service team of naturalists, sportspersons, photographers, journalists, editors, and authors who are familiar with all or a large listing of Forest trails • To address funding problems • To deal with environmental damage on some trails • To deal with confusion over usage on some trails • To remove the uncertainty trail users have regarding the term “non recommended”.
Response:	The Revised Forest Plan has an objective to develop a Forest-wide trail management plan to establish trail classes, permitted uses, and construction, reconstruction, and maintenance priorities (see Objective RC26 on page II-30 of the Proposed Revised Plan). We will see that your comments are passed on to those who develop this plan. The reasons this plan was not developed during Forest Plan revision are explained on page II-4 of the DEIS.
PC 578	The Forest should provide clear trail markings at major intersections.
Response:	Trail marking is beyond the scope of Plan revision. Trail marking at the site-specific scale depends on trail classes. In some areas, like Wilderness, trail markings are mainly for resource protection rather than visitor convenience.
PC 575	The Forest should close trails that run adjacent to streams occupied by wood turtles and reroute them to the roads and other trails that exist at a greater distance from the stream.
Response:	The only currently known wood turtle location within the Forest proclamation boundary is not on National Forest System land. If occurrences are discovered on NFS land, protections can be designed and evaluated on a case-by-case basis.
PC 491	The Forest should protect trails from damage caused by logging activities.
Response:	Trail protection from harvest activities has improved in the Proposed Revised Plan compared to the 1986 Plan. See Forest Wide Standards RC28, RC29, and Guideline RC31 (Proposed Revised Plan, page II-30). However, some damage may still occur during operations. Additional mitigation measures to protect trails may be developed during site-specific project planning.