

E-Collaboration

Hello, I participated in the Dec 1st meeting at the Boise satellite location. We appreciate being involved in the collaborative and believed the time was very productive. I am submitting additional comments regarding the document, "Infrastructure, Roads System Interdisciplinary Team Recommended Plan Components." This document was sent in an email on December 7, 2012. That email stated that roads will be further discussed during the next meeting, January 12, 2013. Unfortunately, I will not be able to attend the January meeting. We hope that another EPA representative will be able to participate. In the meantime feel free to contact me with any questions.

The following are my comments:

- **Desired Future Condition (DFC):**

As described in the background documentation a DFC is a description or ecological characteristics of the plan area toward which management of the land and resources should be directed. DFCs also "must be described in terms that are specific enough to allow progress toward their achievement to be determined..." During the meeting I recommended including a DFC that directs resources towards managing roads to reduce sediment loads to surface water in the forest. Currently, the suggested insertion is, "Roads do not contribute to water quality degradation (i.e., sediment loading and temperature increases) and do not adversely affect aquatic habitat. During our meeting it was presented that water resources would not be included in the section on roads, but will be covered elsewhere. I would like to reiterate the close relationship between roads and water quality. The EPA is open to addressing this issue under a different section (water/aquatic resources section); however, we feel that it is important to record and track this issue. We recommend that it remain as a guiding DFC with measurable objectives, standards and guidelines until the resource experts develop a section that includes road and water quality/aquatic resources. Moreover, the objectives included a measure to protect watersheds and wildlife habitat (Objective 1) and therefore, it seems relevant to include a DFC to guide that objective.

At the closing of the meeting the USFS said that the collaborative workgroup would not be providing input on the DFCs for water resources because the USFS will be bound by requirements imposed by the Services. Because we may not have the opportunity to provide input on the DFC, we further think it is imperative to clearly capture the DFC under roads so that forest managers can determine uses that are suitable and actions related to road density, roads in riparian areas, stream crossings, fish passage.

- **Objectives:** Under Objectives, First Bullet- there is a comment related to the word "remove." Part of the comment balloon was my comment. Because of the time/format constraints, our small workgroup wasn't necessarily able to characterize every comment to the full extent.

To clarify, I do not concur with the change from "decommission" to "remove" roads from the USFS road system. As I understand, a road that is removed from the USFS system may only mean that it is not approved for public access and would not require the USFS to decommission or revegetate the road. Roads contribute significant amounts of sediment to surface water and roads in close proximity to surface water that are not maintained or decommissioned can deteriorate and result in increased sediment and adverse impacts to water quality. Therefore, I recommend that either the term decommissioned be used or a clear definition of removed be added, which includes decommissioning. Furthermore, EPA recommends that the assessment include a prioritization of road closures based on areas of concern (e.g., habitat or water quality) and include a clear description of what actions would occur under road closures/removal from USFS system.

- **Standards and Guidelines:** The document does not include Standards and Guidelines (S&G). We believe the S&Gs are important components in the Forest Plan to help achieve DFCs by establishing

