

February 18, 2009

Ms. Ann Bartuska, Acting Under Secretary
Natural Resources Environment
United States Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250

Dear Acting Under Secretary Bartuska:

On behalf of the 102 organizations that supported a proposal to the economic stimulus bill to provide \$500 million to the Legacy Roads and Trails Remediation (Legacy Roads and Trails) program, I write to strongly recommend that the Forest Service dedicates \$380 million from the economic stimulus funding for Legacy Roads and Trails activities.

In December these groups advocated for funds to restore watersheds, specifically for decommissioning unneeded Forest Service roads, upgrading culverts for fish passage, other associated storm-proofing activities, and critical maintenance on recreational trails. We were grateful to see that the language in the stimulus bill expressly includes congressional direction to carry out this critical work in addition to regular road maintenance. Furthermore, the Senate Interior stimulus bill identified what we believe to be appropriate amounts of funding: \$280 million for roads and \$100 million for trails work. Investing stimulus funds in Legacy Roads and Trails activities can help the agency “right-size” the road system and address trail maintenance backlogs, ensuring that needed infrastructure is improved while unneeded, ecologically damaging, expensive infrastructure is decommissioned and reclaimed.

With extreme weather events anticipated to increase due to climate change, it would be wise for the agency to work to prevent harm to communities and water resources by dedicating a substantial portion of the available funds to removing roads that are not needed and have a high likelihood of failure. This will also save taxpayer money over the long-term by reducing the maintenance burden and reducing costly ecological damage.

Specific criteria for identifying these roads and implementing this program should include:

- Prioritizing watershed restoration in areas where a limited investment can result in significant ecological and economic returns. Identify priority basins and sub-basins with the best opportunities to attain water quality objectives with limited investment and the treatment of relatively few road and trail miles (e.g. treat healthier watersheds first).
- Directing agency staff to identify a preliminary list of roads to be decommissioned to establish a fiscally and ecologically sustainable road system, ideally resulting in the

identification of a minimum road system for maintenance level 1-5 roads, as initially recommended in the 2001 long-term roads policy.

- Dedicating a small portion of the funding to facilitate implementation of the program by hiring temporary staff at the forest level for contract oversight and NEPA project planning.
- Prioritizing the majority of funding for road decommissioning efforts on the ground rather than fixing unneeded roads that are likely to fail again in future storm/flood events.
- Upgrading culverts and fixing barriers to fish passage on roads that provide critical access, and therefore cannot be decommissioned.
- Directing individual forests to utilize local hiring preferences at prevailing wage rates to ensure that stimulus funds will have the greatest impact for job creation in rural communities consistent with President Obama's goal of creating green jobs.
- Partnering with other entities to provide apprenticeship and training opportunities to ensure that heavy equipment operators engaged in road decommissioning and culvert upgrades are fully trained to implement these projects effectively, and with the greatest benefit to the ecosystem.
- Encouraging multi-state, comparative economic and ecological monitoring programs through partnerships and direct monitoring efforts.

We understand that the agency must act very quickly to determine which projects can be funded. We believe using the mandate provided by the Legacy Roads and Trails program for economic stimulus funding provides the agency an opportunity to improve its recreational trails, rethink road management, and invest in road decommissioning. In so doing, the Forest Service can reduce the size of the road system, its terrestrial and aquatic impacts, and the long-term maintenance burden.

We are very concerned, however, that instead of reducing the size, impact and cost of the road system, stimulus funds may be used simply to move roads from passenger vehicle status to high-clearance vehicle status while leaving the overall system largely intact. This would undermine the direction of Congress that funds be used to decommission and therefore downsize the over-built, severely under-maintained Forest Service Road system. We strongly recommend that these funds be spent to decommission unneeded maintenance level 1-2 roads. In addition, a large-scale conversion of ML 3-5 roads to ML 1-2 roads may result in significant losses of recreational access.

One of the stated criteria for prioritizing projects is to create or retain sustainable jobs. The agency has an opportunity to create a more sustainable stream of road and trail management jobs by identifying the minimum road system, prioritizing roads for decommissioning to meet

that minimum road system, and otherwise investing in the rightsizing of the road system into the future. By leveraging stimulus money now, the agency can begin to address its legacy of road problems and the backlog of trail maintenance while simultaneously saving millions of taxpayer dollars over the long-term.

Road decommissioning creates or maintains 14.5 direct jobs per million spent, so it fits well with the priorities outlined in the American Recovery and Reinvestment Act. While we recognize that the agency is interested in utilizing youth and other job corps programs, road decommissioning requires skilled, experienced heavy equipment operators. These are high-wage, high-skill jobs that can help revitalize rural economies. Youth and job corps, supplemented by partner organizations and volunteers, should be able to assist with revegetation work on roads and trails after the heavy equipment work is complete. And to benefit struggling economies, the agency should prioritize skilled, local labor.

We appreciate your consideration of the concerns and opportunities raised above. The undersigned groups stand ready to assist with the large but critical task before you.

Please contact me at 360-352-6236 if you have any questions.

Sincerely,

Sue Gunn

Sue Gunn, Ph.D.
Washington State Representative
Wildlands CPR
P.O. Box 1431
Olympia, WA 98507
(360) 352-6236

Attachment: December 15, 2008 stimulus proposal
cc: Gail Kimbell, Chief, USDA Forest Service
All Regional Foresters

The organizations and individuals supporting funds for national forest watershed restoration under the Legacy Roads and Trails Remediation program in a December 15, 2008 letter to Chairman Dicks are as follows:

Alaska Wilderness League	Washington DC
Allegheny Defense Project	Pennsylvania
Allegheny Group, Sierra Club	Pennsylvania
Alpine Lakes Protection Society	Washington
American Lands Alliance	Washington, DC
American Whitewater	Washington
American Wildlands	Montana
Amigos Bravos	New Mexico
Appalachian Mountain Club	Massachusetts
BARK	Oregon
Bear River Watershed Council	Utah
Bill Worf, Retired Dir. Recreation, Lands, Wilderness, R1 USFS	Montana
Biodiversity Conservation Alliance	Wyoming
Black Warrior Riverkeeper	Alabama
California Oak Foundation	California
California Wilderness Coalition	California
Californians for Alternatives to Toxics	California
Californians for Western Wilderness	California
Cascadia Wildlands Project	Oregon
Center for Biological Diversity	Arizona
Center for Earth Jurisprudence	Florida
Center for Sierra Nevada Conservation	California
Citizens for the Chuckwalla Valley	California
Clackamas County Soil and Water Conservation District	Oregon
Clark Fork Coalition	Montana
Coalition of Retired Sawtooth NRA Land Managers	Idaho
Coast Range Association	Oregon
Colorado Riverkeeper	Utah
Colorado Wild	Colorado
Conservation Northwest	Washington
Cowlitz Tribe	Washington
Endangered Species Coalition	Washington DC
Environmental Protection Information Center	California
Framing Our Community	Idaho
Friends of Blackwater	West Virginia
Friends of the Bitterroot	Montana

Friends of the Kalmiopsis	Oregon
Ft. Collins Audubon Society	Colorado
Georgia ForestWatch	Georgia
Gifford Pinchot Task Force	Oregon
Grand Canyon Trust	Arizona
Grand Canyon Wildlands Council	Arizona
Great Old Broads for Wilderness	Colorado
Hells Canyon Preservation Council	Oregon
High Sierra Hikers Association	California
Jim Furnish, Retired Deputy Chief USFS	Maryland
John Holt, Retired Chief Transportation Development Engineer, USFS	Oregon
Klamath Forest Alliance	California
Klamath-Siskiyou Wildlands Center	Oregon
Living Rivers	Utah
Los Padres ForestWatch	California
Lower Columbia Canoe Club	Oregon
Magic	California
Maine Audubon	Maine
Mason Conservation District	Washington
Mow & Sow	California
Narragansett Chapter Conservation Com., Appalachian Mountain Club	Rhode Island
Native Habitats	California
Natural Resources Council of Maine	Maine
North Cascades Conservation Council	Washington
Northern Forest Center	New Hampshire
Olympic Forest Coalition	Washington
Oregon Trout	Oregon
Oregon Wild	Oregon
Ouachita Watch League	Tennessee
Outward Bound	Utah
Pacific NW Regional Council of Carpenters	Montana
Pacific Rivers Council	Oregon
Pilchuck Audubon Society	Washington
Public Employees for Environmental Responsibility	Arizona
Quiet Use Coalition	Colorado
Red Rock Forests	Utah
River Runners for Wilderness	Arizona
Rocky Mountain Recreation Initiative	Colorado
San Juan Citizens Alliance	Colorado
Save our Ancient Forest Ecology	California

Serpentine Art and Nature Commons	New York
Siskiyou Project	Oregon
Sky Island Alliance	Arizona
Soda Mountain Wilderness Council	Oregon
Southern Appalachian Forest Coalition	North Carolina
Swan View Coalition	Montana
The Clinch Coalition	Virginia
The Lands Council	Washington
The Wilderness Society	Washington DC
Upper Gila Watershed Alliance	New Mexico
Virginia Forest Watch	Virginia
Washington Trails Association	Washington
Washington Wilderness Coalition	Washington
Western Environmental Law Center	Colorado
Western Montana Building and Construction Trades	Montana
White Mountain Conservation League	Arizona
Wild South	North Carolina
Wild Virginia	Virginia
WildEarth Guardians	New Mexico
Wilderness Guides Council	California
Wildlands CPR	Montana
WildLaw Southern Appalachian Office	North Carolina
WildWest Institute	Montana
Winter Wildlands Alliance	Idaho
Yaak Valley Forest Council	Montana