



June 29, 2015

Sustainable Roads System Analysis  
Gifford Pinchot National Forest  
10600 NE 51<sup>st</sup> Circle  
Vancouver, WA 98682

Re: Draft Travel Analysis Plan

Dear Sustainable Roads System Analysis Team:

Thank you for the opportunity to comment on the Gifford Pinchot National Forest's Draft Travel Analysis Plan. The Mountaineers, founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to help people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." Based in Seattle, Washington, The Mountaineers has over 13,000 members and guests in seven branches throughout Western Washington. We support over 1,500 skilled volunteers who lead 3,200 outdoor education courses and activities on everything from backcountry skiing, wilderness first aid, and avalanche safety to conservation education and advocacy. In addition, we provide over 4,000 opportunities for youth to get outside each year.

As a voice for human-powered recreation in Washington State, our interest lies not only in being able to access the backcountry, but also in the road system that allows people to get to trails and the wild places they lead to. We recognize that without a well-maintained road system, our members will lose access to these trails and places they love.

We are concerned to read the Draft Travel Analysis Plan's recommendation that the majority of roads accessing trails will be classified Maintenance Level 2 - High Clearance Vehicles (level 2). Public access on these roads will be maintained, but only for people driving high clearance 4-wheel-drive vehicles. A number of the roads currently listed as level 2 roads are heavily used and access popular trails, such as Road 2150 to the Snowgrass Flat trailhead and Road 2160 to Walupt Lake and area trails, which can further impact the condition of the road and surrounding environment, presenting water quality issues and significantly limiting access to wilderness and forest lands.

While technically meeting the language of the 2005 Travel Management Rule, we do not believe that the recommended road system for the Gifford Pinchot National Forest meets the spirit of identifying "a sustainable road system needed for safe and efficient travel and the protection, management and use of national forest system lands." We are concerned that the classification of a majority of roads leading to trails as Maintenance Level 2 will not "provide



safe access for multiple uses.” As the Draft Travel Analysis Plan admits, “[w]hen aging roads are not maintained, closures compromise visitor experience and public safety is put at risk.” Hikers are likely to attempt to drive passenger cars on Maintenance Level 2 roads, with risk of damage to vehicles and injury to their occupants.

As roads leading to trails fall into disrepair and become impassable, in a downward spiral, so will the trails themselves. If few hikers are using a trail, it will not be a priority for maintenance and, over time, trails will be lost.

While identifying environmental risks associated with roads, the plan fails to acknowledge the recreational and social consequences of a failing road system. More people will be forced on to fewer trails that are accessible by passenger cars at the same time that the Pacific Northwest’s population is growing and more people are seeking backcountry hiking opportunities.

We encourage the Forest to consider these important recreation aspects to the Draft Travel Analysis Plan.

Thank you,

Martinique Grigg, Executive Director