

Road Maintenance and Abandonment Planning for Large Forest Landowners

9.1 Introduction

Forest practices rules include a road maintenance and abandonment program to prevent sediment and hydrology-related impacts to public resources such as fish and fish habitat. The rules require large forest landowners (as defined in WAC 222-16-010 under “Forest Landowner” and in Section 3 of the Board Manual) to develop and implement an RMAP for roads within their ownership. In an effort to minimize the economic hardship on small forest landowners, the 2003 Washington Legislature passed a RMAP bill (HB1095) that modified the definition of “small forest landowner” and clarified how the RMAP requirements applied to small forest landowners. Small forest landowners have the option to submit a “checklist” RMAP with each forest practices application or notification, rather than to provide a plan for their entire ownership. DNR, in consultation with WDFW and Ecology will submit a report to the legislature and the Board in December 2008 and December 2013 on the effectiveness of the checklist RMAP.

Large forest landowners were required by July 1, 2006, to have all roads within their ownership covered under a DNR-approved RMAP (WAC 222-24-051) and to bring all roads into compliance with forest practices standards by July 1, 2016. This includes all roads that were constructed or used for forest practices after 1974. An inventory and assessment of orphaned roads (i.e., forest roads and railroad grades not used for forest practices since 1974) must also be included in the RMAP. In areas where watershed analysis has been conducted and approved, large forest landowners may elect to follow the watershed administrative unit-road maintenance plan rather than developing an RMAP under WAC 222-24-051.

9.2 Approved Road Maintenance and Abandonment Plans

The following table, “2007-2008 Status of Large Landowner RMAPs” lists by DNR region the number of large landowners with RMAPs and the status of their RMAPs. Currently, there are a total of 107 large landowners statewide requiring RMAPs. In many cases, a single large landowner may have multiple RMAPs distributed over more than one DNR region.

2007-2008 Status of Large Landowner RMAPs

DNR Region	# of Large Landowners with RMAPs	RMAP Status
Northwest	20	All Plans Approved
Pacific Cascade	29	All Plans Approved
South Puget Sound	15	All Plans Approved
Olympic	21	All Plans Approved
Northeast	8	All Plans Approved
Southeast	14	All Plans Approved, except as noted below*

Total	107**	
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* Landowner “A” has acquired industrial forestland under an existing RMAP and DNR is continuing to work with the landowner to amend the RMAP and the schedule of work.

* Landowner “B” has an incomplete RMAP (1500 acres out of 131,000 total acres) and is continuing to work with DNR to complete and update the inventory of roads; and identify fish passage barriers based on updated water type maps.

* Landowner “C” (as identified in the 2006-2007 annual report) purchased industrial forestland that is currently under an approved RMAP. During the past year, Landowner “C” gifted the land to Landowner “B” who now assumes the RMAP obligations.

*Landowner “D” has modified its harvest levels to exceed more than 2 mm board feet of timber per year, and is working with DNR to amend an existing RMAP.

**The increase in the total number of RMAPs since last year’s annual report is the result of two new RMAPs in South Puget Sound Region.

9.3 Road Maintenance and Abandonment Plan Implementation

The RMAP process is intended to bring all roads owned by large forest landowners into compliance with forest practices standards by July 1, 2016. The following tables, “RMAP Accomplishment Report From 2001-2007”, and “Yearly Cumulative Reports” details the progress that’s been made by both large and small landowners from July 2001 until December 2007.

RMAP Accomplishment Report From 2001-2007

DNR Region	Total # of Approved RMAPs by Large Landowners	Miles of Forest Road ¹	Miles of Road Abandoned	Miles of Orphaned Roads	Miles of Fish Passage Opened ²	# of Structures Fixed on Fish Habitat Streams ³
Northeast Region	8	7,625	273	96	231	463
Northwest Region	20	5,841	738	650	40	148
Olympic Region	21	7,648	90	353	189	270
Pacific Cascade Region	29	21,928	415	703	489	1,001
South Puget Sound Region	15	7,886	213	220	109	217
Southeast Region	14	6,008	424	271	163	149

Statewide Totals (as of 12/31/07)	107	56,936	2,153	2,293	1,221	2,248
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¹The majority of the miles are from large forest landowner RMAPs

²Does not include data from the Family Forest Fish Passage Program

³Does not include data from the Family Forest Fish Passage Program

Yearly Cumulative Reports

Reporting Years	Total # of Approved RMAPs & Submitted Checklists	Miles of Forest Road	Miles of Road Abandoned	Miles of Orphaned Roads	Miles of Fish Passage Opened	# of Structures Fixed on Fish Habitat Streams
2001-2002	4,066	15,484	645	502	52	46
2001-2003	5,530	27,072	1,007	1,246	175	355
2001-2004	7,401	48,051	1,587	1,944	647	1,217
2001-2005	8,419	58,843	1,856	2,107	775	1,363
2001-2006	9,950	59,220	2,068	2,313	982	1,819
*2001-2007	107 (RMAPs)	56,936	2,153	2,293	1,221	2,248

Note: In 2002, state law exempted small forest landowners from submitting annual reports. Therefore, this data is from large landowner's annual reports from 2001-2007 and small forest landowners annual reports from 2001-2002.

***2001-2007**, 2007 is the first year the number of submitted Large Landowner RMAPs and submitted Small Landowner RMAP Checklist are separated.

Commitments were made in the 2006-2007 annual report to provide additional information in subsequent reports relating to the numbers of fish passage barriers for large forest landowners and a summary of those repaired or replaced; miles of forest road improved as a result of industrial RMAPs; and an update on the achievability of the scheduled RMAPs work by 2016.

Fish Passage Barriers

The following table, "Fish Passage Barrier Information for Large Landowners" displays the total number of presumed fish passage barriers identified in RMAPs by DNR region. It also shows how many have been repaired cumulatively since 2001; the total repaired in calendar year 2007, and the percent of total repaired as of December 31, 2007.

Fish Passage Barrier Information for Large Landowners

DNR Region	Total # of presumed fish passage barriers in RMAPs*	Cumulative repairs from 2001-2007	Total repaired in calendar year 2007	% of total repaired as of Dec. 31, 2007
Northeast Region	861	463	70	54%
Northwest				

Region	610	148	22	24%
Olympic Region	1,194	270	82	23%
Pacific Cascade Region	2,591	1,001	206	39%
South Puget Sound Region	676	217	35	32%
Southeast Region	573	149	14	26%
Totals	6,505	2,248	429	35%

*This number may fluctuate slightly when water types are confirmed and/or modified.

Road Improvements

In an effort to compile the number of forest road miles improved since the RMAP forest practices rule was effective, DNR sent a letter in early 2008 to all industrial forest landowners with Road Maintenance and Abandonment Plans, asking for the following information:

1. How many miles of forest road were originally identified for improvement to meet the requirements of Chapter 222-24 WAC, *Road Construction and Maintenance*?
2. Approximately how many of those forest road miles identified in question #1 have been improved to meet the requirement of Chapter 222-24 WAC, *Road Construction and Maintenance* as of December 31, 2007?

The letter also explained that beginning with the 2008 RMAP annual reporting cycle, industrial landowners will be asked to include the total number of miles of forest roads improved during the past calendar year. This is an addition to the usual annual RMAP reporting requirements.

Ninety-nine letters were sent and 77 responses were received; a 77% response rate. The responses represented 219 individual RMAPs. The majority of the 22 landowners who did not respond are mid-sized forest landowners with fewer miles of forest road overall on the landscape. Statewide, landowners responding reported approximately 22,900 miles of forest road identified as needing improvement, with approximately 13,100 miles improved as of December 31, 2007, or a 57% accomplishment rate.

While the information represents significant and ongoing progress that has been made and continues to be made to meet the RMAP obligations, there are several limitations to the road improvement data collected this year.

Data Limitations

There was confusion surrounding the term “road improvement”, and what it actually refers to. Different landowners interpreted it differently. Without a standard, consistent working definition as it relates to RMAPs, some landowners reported miles of roads that were routinely maintained (i.e. ditch cleaning, road grading, roadside vegetation

management, etc.), while others only identified those miles where significant improvement projects had occurred to meet forest practices standards (i.e. road redesign, bridge installations, etc). In some cases, if roads had been maintained multiple times over the years, those miles may have been reported more than once. In other instances, the miles reported reflected only a “snapshot in time” – road conditions today.

Several landowners reported their road improvement accomplishments in numbers of projects completed, rather than in numbers of road miles. These projects were not converted to road miles, and were therefore not included in the summary by road miles. For example, a company identified 19 projects to be accomplished to improve roads, and 19 have been accomplished; another identified 50 projects, with 8 accomplished. As a result, the total statewide number of road miles identified as improved may not be accurate, and could be slightly underestimated. In addition, other landowners assigned a certain mileage to point repairs (i.e. a specific location on the road), and each landowners most likely did this differently.

A few others reported total number of forest road miles identified in their RMAPs, rather than only those needing improvement. This likely represents a slight overestimate in the number of forest road miles needing to be improved. But in many cases, most of their total road miles were reported as meeting forest practices standards. For example, one company reported 41 miles of total road in their RMAP, with 36 miles reported as improved.

A meeting is planned later in 2008 with the forest practices division staff, region RMAP specialists, and other forest practices region staff to discuss several RMAP issues, including those that evolved as a result of the data collection effort for road improvement. It is the State’s intention to resolve these issues, and present more consistent and concrete information in subsequent annual reports.

Achievability by 2016

The following tools are used to ensure that landowners meet the obligations of their approved RMAPs in an even-flow manner by July 1, 2016:

- **Annual Report**

Landowners are required (WAC 222-24-051 (8)) to annually report on work accomplished for the previous year and to submit a detailed description of the upcoming year’s work. Any modifications to the upcoming work schedule are included in the annual report and reviewed in consultation with Ecology, WDFW, affected tribes and other interested parties.

- **Annual meetings**

Annual meetings are held between DNR RMAPs staff, industrial forest landowners, and others to discuss accomplishments; upcoming plans; project priorities; and landowner’s ability to meet the scheduled work required by 2016. Further meetings may be necessary to refine the current work schedule or to request a new work schedule for evaluation and acceptance by DNR in order to meet the target deadline.

9.4 Washington Department of Fish and Wildlife Efforts

RMAPs are one of the major activities for WDFW's Forests and Fish (F&F) biologists who provide an essential role in the review and implementation of RMAPs. The following is a description summary of the RMAPS duties performed by the WDFW staff.

- Review of new and ongoing RMAP proposals.
- Issue Hydraulic Project Approvals (HPAs) for RMAP work. Approximately 800 RMAP related HPAs were reviewed in FY08.

The 2016 deadline for completing RMAP work will continue to create a large demand for HPAs. The number of applications associated with large landowners RMAPs has grown significantly over the past few years, from 230 in 2002, to 2963 in 2006. In FY 2008 approximately 4500 forest practice applications were reviewed for HPA requirements. The complexity of technical assistance and HPAs needed from WDFW biologists has increased as work is shifting from the easier fixes to the more challenging crossing structures as well as structures located higher in the watershed.

- Review forest practices applications for HPA requirements, provide site reviews, issue HPA permits, and provide other technical assistance as needed.
- Develop, review, and consult with small forest landowners addressing stream typing, aquatic resource protection and road issues. Provide technical assistance, pre-site reviews, review of completed long-term plans, and issue HPA's for small forested landowners.
- Review revised RMAPs as landowners make annual changes pertaining to fish passage structures, fish habitat, stream typing, and sediment delivery.
- Review revised RMAPs as land ownership changes. Ownership changes have been occurring at a relatively high rate.
- Provide technical assistance and review for alternate plans for both small and large industrial landowners.
- Validate stream typing, including identifying the breaks between fish and non-fish streams, as part of the RMAPs process, as well as implementation of the forest practices rules for riparian zones.

With the development of the new DNR hydro-layer, state and private landowners have increased their efforts in identifying breaks between fish and non-fish streams. Additionally, as a result of the stream type surveys, landowners are submitting hundreds of water type change forms to DNR requesting changes to water type maps. Many of these water type modifications require more than one site review and have substantially increased F&F biologist's workload.

- Participate in the review and development of Forests and Fish Report (FFR) related research through CMER committee participation.

Provide technical assistance as needed to forest landowners for: aquatic related mitigation and restoration and to identify specific habitat needs for species of concern.