March 6, 2016

Erin Uloth, District Ranger
Mt. Baker Ranger District
810 State Route 20
Sedro-Woolley, WA 98284-1263

RE: Upper Nooksack Access Travel Management Project Draft Plan

Dear District Ranger Uloth,

Thank you for the opportunity to provide comments on the Draft Environmental Assessment (EA) for the "Access Travel Management (ATM) Project" in the Upper Nooksack region. As non-profit organizations focused on conservation and recreation with members who live, work and play in the region, we have a strong interest in current and future management activities on the Mt. Baker – Snoqualmie (MBS) National Forest.

Many of our organizations submitted scoping comments in September 2015. Since those comments we have noticed that the Middle Fork Nooksack road system has been added to the project area and an additional alternative has been added for consideration which includes more consideration for identification of road decommissioning.

After reading through the Draft EA, we offer the following comments:

I. Support for the Stated Purpose and Need of the Project

We are aware of the many challenges the U.S. Forest Service (USFS) faces with its oversized and under-maintained road system and have worked to help address some of the funding challenges. The agency's road system was built decades ago – historically financed nearly 75 percent by federal appropriations - to support large-scale timber cutting. Today, the road network continues to support forest management activities in addition to a strong recreation economy, with at least 63 percent of Washingtonians participating in outdoor activities each year spending $21.6 billion annually on trips and equipment that supports nearly 200,000 jobs[1].

Unfortunately, road budgets do not support this increase in demand as funding levels have dropped to 18 percent of what they were in 1990. We understand that the Forest Service is overwhelmed by significant management and ecological problems related to this deteriorating infrastructure. We recognize and support the need to make

[1] Briceno, T., Schundler, G. 2015. Economic Analysis of Outdoor Recreation in Washington State. Earth Economics, Tacoma, WA.

decisions to adapt to modern-day recreational interests and tribal and cultural needs, while also reducing aquatic and terrestrial impacts and lining these needs up with realistic budgets. We appreciate your effort in working toward achieving this balance.

We also feel strongly that despite the existence of a nearly $3 billion road maintenance backlog on the more than 370,000 miles of Forest Service system roads nationwide, significant common ground exists around maintenance priorities and restoration opportunities. Most Forest Service roads fall into two general categories:

1. Recreational Access Roads: –- roads that provide access to recreational opportunities (e.g., trailheads, campgrounds, river access, other infrastructure, etc.) and other important National Forest lands for preserving management, cultural, and/or social access; and
2. Legacy Roads – already closed old, decaying and poorly maintained logging roads that have significant aquatic risk factors posing threats to watershed and fisheries health (e.g., clogged culverts, sedimentation, etc.) while not providing significant recreational or other access.

Fortunately, these two general road categories are largely mutually exclusive. For example, most of these decaying logging roads, due to their lack of maintenance over the years, do not provide significant recreational or access opportunities, and are relatively non-controversial to close or decommission. A third much smaller category includes a handful of roads on different forests that do provide potential access but at an engineering, ecological or financial cost that makes for a robust public debate (e.g., Dosewallips, etc.). Unfortunately, despite being a minute percentage of the overall road system, these difficult decisions receive the most attention and often color the public narrative on Forest Service roads.

Many of our organizations have joined with the Washington Department of Ecology through the Washington Watershed Restoration Initiative to support the more than $300 million investment of federal funding over the last decade to address the legacy road problem through the Legacy Roads and Trails program. We encourage the Forest to use the Sustainable Roads Strategy (SRS) and ATM process to embrace the significant common ground around legacy roads and to preserve and enhance recreational access during this process, while also achieving the goals of a sustainable road system.

II. Alternative A would be an insufficient response to the Travel Management Rule

As described in your announcement, the purpose of this project is to "align the size of the Forest Service road system with projected road maintenance budgets." Further, the MBS will "balance access needs with resource protection and existing budgets." This stems from the Travel Management Rule (referred to as "Subpart A") in 2001.[2] The rule directs each National Forest to conduct "a science-based roads analysis," generally referred to as the "travel analysis process" or, as the MBS has described, a "Sustainable Roads Strategy." [3] Forest Service Manual 7712 and Forest Service Handbook 7709.55, Chapter 20 provide detailed guidance on conducting travel analysis. Based on that analysis, forests must first "identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands."[4] The Rule further defines the minimum road system as:

> *…the road system determined to be needed [1] to meet resource and other management objectives adopted in the relevant land and resource management plan . . . , [2] to meet applicable statutory and regulatory requirements, [3] to reflect long-term funding expectations, [and 4] to*

[2] 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A

[3] 36 C.F.R. § 212.5(b)(1)

[4] 36 C.F.R. § 212.5(b)(1)

ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

Forests must then "identify the roads . . . that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails."[5]

While Subpart A does not impose a timeline for agency compliance with these mandates, the Forest Service Washington D.C. Office, through a series of directive memoranda, ordered forests to complete their Travel Analysis Process (called the SRS on the MBS) by the end of fiscal year 2015, or lose maintenance funding for any road not analyzed. The memoranda articulate an expectation that forests, through the Subpart A process, "maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns."

Alternative A represents the no-action alternative in this Environmental Assessment. Choosing Alternative A would not meet the goals set out in Subpart A in the 2001 Travel Management Rule or the stated purpose and need of this ATM plan.

III. Prioritize Road Decommissioning without negatively impacting key recreational access opportunities

This ATM plan for Upper Nooksack is an important opportunity to make a significant decision to establish a sustainable road system moving forward. We feel that the Forest Service should make a concerted effort to maximize road decommissioning for those roads that do not provide significant recreational access in order to get the biggest "bang for the buck" with respect to the purpose and need of this plan.

By definition those roads that are lower on the maintenance level scale (1-5) will take more resources to adequately maintain both near term and annually. In addition, there are additional funds (legacy roads, stewardship, etc.) that can be applied above to these activities beyond the general road maintenance dollars referenced in the budget assumptions in the plan.

As forest road users and conservationists, we understand that a strategic reduction in road miles does not necessarily equate to a loss of access. Some roads are already functionally closed, either due to washouts, lack of use, or natural vegetation growth. Other roads receive limited use and are costly to maintain. It is our belief that resources can be better spent on roads providing significant access than to spread resources thinly to all roads. This is why we support the careful analysis and decision to decommission or close specific roads.

Leading up to the sustainable roads process and this specific ATM plan, the Mt. Baker-Snoqualmie National Forest (MBSNF) had already identified approximately 85 miles of forest system roads within the project area with an objective maintenance level (OBL) of "decommission" in the INFRA road database (2012). See Appendix A. Alternative B proposes to decommission about 6 miles of roads (including about 2 miles previously identified as OBL decommission). Alternative C includes approximately 41 miles for decommissioning (including about 31 miles previously identified as OBL decommission).

We understand that not all of the road segments with an OBL of decommission in the INFRA roads database have gone through a National Environmental Policy Act (NEPA) based process like the current ATM. Our point is not that all - or even the vast majority of - those roads merit a maintenance level change to decommission as part of this plan. We expect that the sustainable roads analysis has provided better and more accurate information that

[5] 36 C.F.R. § 212.5(b)(2). The requirements of subpart A are separate and distinct from those of the 2005 Travel Management Rule, codified at subpart B of 36 C.F.R. part 212, which address off-highway vehicle use and corresponding resource damage pursuant to Executive Orders 11,644, 37 Fed. Reg. 2877 (Feb. 9, 1972), and 11,989, 42 Fed. Reg. 26,959 (May 25, 1977).

can and should be applied to this question. However, we would expect that more than 6 miles of roads would meet the criteria of having current or long-term aquatic risks and providing no key recreational access.

IV. Prioritize maintenance of existing recreational access routes

Several roads in the Upper Nooksack area provide important access opportunities for recreational use. These important roads should be scored highly as to their benefits in the sustainable roads analysis and given significant consideration for retention and maintenance. Many of these road segments have been identified as providing important recreational access in the recently completed Upper Nooksack River Recreation Plan (March 2015)[6]. We have listed the key access roads below including their recreational importance.

- Highway 542 (FS3000) to road end including Horseshoe Bend, Excelsior Pass, Chain Lakes, Bagley Lakes, Wild Goose, Picture Lake, Panorama Dome, Lake Ann, Artists Ridge, Table Mountain, Ptarmigan Ridge, Heather Meadows and Fire and Ice Trails, Douglas Fir, Excelsior and Silver Fir campgrounds and Mt Baker Ski Area and Artist Point – hiking, equestrian, downhill skiing, camping, scenic viewing, paddling
- FS 3060 to High Divide Trailhead including High Divide Trail – hiking. equestrian
- FS 3040 to Church Mountain Trailhead – hiking
- FS 3065 to Winchester Mountain, High Pass and Silesia Creek trailhead including Tomyhoi Lake and Yellow Aster Butte Trails – hiking, equestrian
- FS 3070 to road end and 020 spur – nordic skiing
- FS 3071 to the switchback above the second crossing of Anderson Creek (approximately the 4 mile mark) – nordic skiing
- FS 3075 to road end including 011 and 012 spurs – nordic skiing
- FS 3100 to Damfino Lakes Trailhead including access to Boundary Way and Canyon Ridge Trails – hiking, equestrian, mountain biking, paddling
- FS 32 to road end including Hannegan Pass and Goat Mountain Trails – hiking, alpine climbing, nordic skiing, equestrian
- FS 33 to Nooksack Falls Trailhead – hiking
- FS 34 to the Nooksack Cirque Trailhead – hiking, alpine climbing
- FS 37 to Skyline Divide Trailhead with access to Boyd Creek Trail – hiking equestrian
- FS 38 to Ridley Creek Trailhead including Elbow Lake and Bell Pass Trails – hiking, equestrian, climbing
- FS 39 to Mt Baker Vista including Heliotrope Ridge Trail – hiking, scenic viewing, alpine and ice climbing, paddling
- Other roads groomed in winter to provide winter recreational opportunities as part of the Salmon Ridge, Glacier Creek and Canyon Creek SnoPark systems – nordic skiing, cross country skiing, snowshoeing, snowmobiling

V. Fully consider road-to-trail conversion as an option for targeted opportunities

An additional tool to preserve or enhance recreational access, while mitigating future annual maintenance costs of legacy roads, is to consider a road-to-trail conversion. While we understand this option may not apply to every situation, we feel it is an extremely useful tool when developing a sustainable road system. Road-to-trail conversions have the benefit of reducing future annual road maintenance costs while retaining or adding recreational access opportunities on the forest. In some cases (like the end of the North Fork Nooksack Road) which is currently used as a non-motorized trail to the Nooksack Cirque, the cost and effort to convert to a trail is significantly less and makes perfect sense. In other cases a portion of a high aquatic risk and expensive road segment that accesses an existing trailhead may merit being decommissioned but there is still strong interest in

[6] http://www.americanrivers.org/initiative/wild-and-scenic/projects/nooksack-river-recreation-planning/

retaining the recreational access. A road-to-trail conversion of a modest road segment in this category makes perfect sense.

We were concerned to see that in Section 2.2.3 (pg. 32) the Draft EA seems to dismiss the option of a road-to-trail conversion as part of this ATM process based on lack of current funds for such activities:

> *…these road-to-trail conversions were eliminated from further study as the Forest trail maintenance program does not have the available funds to add these trails to the trail system."*

This is insufficient reason to fully consider the road-to-trail conversions that were suggested by the public in scoping (including the end of the North Fork Nooksack Road). Making a decision to authorize a road-to-trail conversion does not mean that funding must be available in the current of following fiscal year. This ATM plan is by definition making road maintenance level decisions that look years into the future. Many of the decisions ultimately made in this plan will not be implemented right away. Consider that the preferred alternative (B) admits to pursuing a road system that cannot be fully funded. In addition, many of the road-to-trail projects on other parts of the MBS were made possible through partnerships. While the Forest Service may not currently have the resources, a decision document that identifies road-to-trail conversions can be used by partners to bring in additional resources.

We feel strongly that any road-to-trail opportunities should be fully considered before any final decision is made.

VI. Ensure that aquatic risk factors are transparent and are a key factor in any decisions made

Analysis of aquatic risk factors of specific road segments is a critical input to achieving the stated purpose and need of this project. For example section 1.6 Purpose and Need for the Proposal (pg. 13) of the EA lists the first need as "Restore and protect the project area's ecology from impacts of the road system."

Information from the aquatics risks analysis is particularly important, given the recognition of the Nooksack as a Tier 1 Key Watershed in the Northwest Forest Plan and its importance for salmon recovery, other wildlife, and a source of clean water.

According to the "Salmon and Steelhead Habitat Limiting Factors in WRIA 1, The Nooksack Basin" report of July 2002, sedimentation resulting from high road densities and landslides (from both timber harvest and roads) has a considerable impact to salmonid spawning habitat in the Nooksack Basin. Recommended actions include (p.275):

- "Decommission or treat roads that are at a moderate to high risk of mass wasting potential in the North, South, and Middle Fork Nooksack sub-basins.
- Decommission or treat orphan roads that are at a moderate to high risk of mass wasting potential."

According to watershed analyses for Canyon Creek (1995), North Fork Nooksack (1995) and Middle Fork and South Fork Nooksack (2006) several natural resources needs were identified within the project area:

> *… There is a need for a reduction of sedimentation, landslides and other catastrophic failures associated with roads and human infrastructure. For those [roads] needed as part of the transportation system, there is a need for stabilized and/or upgraded roads and stream crossings to reduce the risk to riparian and aquatic conditions. (Pg. 13 of EA)*

The USFS has also consistently worked to improve aquatic habitat and watershed conditions, most recently under the "Watershed Condition Framework." According to the Agency's assessment of 12 watershed health indicators

in the sub-watersheds of the Nooksack, the roads/trails indicator is rated "poor" in Canyon Creek, Glacier Creek, Hedrick Creek (NF Nooksack River), Twin Lakes (NF Nooksack River), and "fair" in the Headwaters (NF Nooksack River). This indicator is based on four factors: open road density, road/trail maintenance, road proximity to water and mass wasting. In order to improve watershed conditions, these factors must be addressed.

The Draft EA identifies that a low, medium or high aquatic risk factor was applied to all road segments (PG. 10 of the EA). However, the only evidence of this analysis in the EA is the map on Pg. 11. It is confusing and unclear what combination of aquatic and other risk factors and benefits this map portrays with a scale of 1-12.

We understand that the SRS determined, across the forest, which roads are "high risk" for aquatic and terrestrial resources. It would have been helpful to have included a table displaying the aquatic risk factors for each segment of road in the project area. This is one of the most important factors in making decisions relevant to the stated purpose and need.

VII. Support for a Modified Alternative B

As stated before, we feel that adoption of Alternative A will not meet the Purpose and Need identified for this action.

We feel that Alternative B takes a number of useful steps to move toward a more sustainable road system but could go further with respect to some targeted road decommissioning while retaining access to key recreational opportunities.

Alternative C identifies a number of relevant and appropriate decommissioning opportunities but also makes additional decisions that impact key recreational infrastructure. For example, Alternative C would negatively impact existing access to the High Divide and Church Creek Trails by closing or decommissioning roads (FS 3060, FS 3300) that access these established trailheads. Additionally, existing elements of the Salmon Ridge, Canyon Creek and Glacier Creek SnoPark systems would be impacted from proposed maintenance level decisions in Alternative C.

As a result of conversations with planning staff and district leadership, we understand that there is room to identify different elements of alternatives to add or subtract during the draft plan public comment period. To that end, our organizations support a modified Alternative B with additional road segments targeted for road decommissioning that do not have significant impacts on recreational opportunities.

<u>Description of Modified Alternative B</u>

Most of Alternative B would be retained including the following elements which we support:

- Roads that are groomed in winter under agreement with Washington State Sno-Parks Program and the National Recreational Trails Program would remain basically the same. (Pg. 99 of the EA). To be clear, in instances where a ML 1 is identified for any road segments that are part of the Sno-Park systems, those segments should not pull out culverts or bridges if doing so would interfere with the winter recreation program.
- Alternative B would make minimal changes to the road segments that access trails within the project area. Recreational opportunities would remain primarily the same. (Pg. 132 of the EA)
- Decommissioning or closing of targeted roads would have the greatest effect of limiting the continued disturbance under which invasive plants thrive as well as stop the route of entry into new areas previously un-infested. (Pg. 56 of the EA)

- The storage (ML1) or decommissioning (ML0) of forest system roads has tremendous value for the restoration of ecological functions (Madej 2001; Switalski et al. 2004) that directly benefit fisheries resources. (Pg. 63 of the EA)
- Alternative B includes stream-crossing restoration activities by either storing or decommissioning official system roads. The restoration of stream crossings would allow for more natural drainage patterns, which decreases the amount of water being collected by hardened road surfaces that is delivered to stream networks. (pg. 70 of the EA)
- Under Alternative B, roads that are stored or decommissioned would nearly eliminate the long-term production of fine sediment, which would protect downstream water quality and water users. (Pg. 71 of the EA)
- Both action alternatives would contribute to the long-term reduction of stream temperature by allowing the reestablishment of effective shade-producing vegetation along stream banks. (pg. 76 of the EA)
- Alternative B would provide for more riparian habitat restoration over the no-action alternative (Alternative A), which would not restore any riparian reserve areas. (Pg. 77)

We suggest making the following adjustments to Alternative B as laid out in the EA. Each of these additions will increase or not change the value of the elements listed in the above section.

Adjustment to Proposed Road Decommissioning in Alternative B

Alternative B proposes to decommission the last 0.6 miles of FS RD 3040 which access the Church Mountain trailhead. As indicated in Section IV of these comments, we do not support eliminating access to this or other established trailheads. We would support decommissioning the road segment beyond the existing trailhead (approximately 0.25 miles rather than 0.6 miles) which we have incorporated in our Modified Alternative B.

Additional Road Decommissioning Beyond Alternative B

Alternative B proposes to decommission just 6 miles of roads. We feel strongly that the ATM, following the recent investment of two years in the Mt. Baker Snoqualmie's sustainable roads analysis can, and should, identify additional road segments that merit a decommission maintenance level decision in order to meet the stated purpose and need of this project. Alternative C identifies 41 miles of roads for decommissioning but those decisions come with some negative recreational impacts we do not support.

In our modified Alternative B, we have identified 29 miles of roads (23 miles above and beyond Alternative B) in the project area that we believe merit decommissioning and do not negatively impact key recreational infrastructure or opportunities. The additional miles of roads to be decommissioned come from targeted road segments identified for decommissioning in the EA as part of Alternative C. A full list of road segments slated for decommissioning as part of our Modified Alternative B can be found in Appendix B of this comment letter.

Summary of Road Decommissioning Action Alternatives & Modified Alternative B			
	ALT B (EA)	**Modified ALT B**	**ALT C (EA)**
Roads included from Alt B	6	5.5	0
Roads included from Alt C	0	23.5	41
Total Roads Decommissioned	**6**	**29**	**41**

Several road segments were deliberately not included that were proposed for decommissioning as part of Alternative C because of the impact they would have on key recreational opportunities. These include:

- FS RD 3060 accessing the High Divide Trailhead
- FS RD 3075-010 and 3075-011 which provide access as part of the Salmon Ridge Sno-Park System
- FS RD 3140-025 and 3140-026 which provide access as part of the Canyon Creek Sno-Park system
- The end of FS RD 3600 which provides access as part of the Glacier Creek Sno-Park System

Impact on Recreational Infrastructure from Decommissioning in Modified Alternative B			
	ALT B (EA)	Modified ALT B	ALT C (EA)
Roads providing current access to Recreational infrastructure	0.6	0	4.1

We researched the road segments identified for decommissioning in one of the action alternatives under a Late Successional Reserve (LSR) designation under the Northwest Forest Plan (NWFP) combined with stand age with respect to potential access for forest restoration activities. None of the roads we selected were in land-use allocations under the NWFP scheduled for forest restoration (e.g. Matrix). We included 16 miles of road segments for decommissioning in our Modified Alternative B that were in NWFP allocations prohibiting or restricting forest restoration (including Administratively Withdrawn and Late Successional Reserve (LSR) over 80 years stand age).

We included an additional 11 miles of road segments for decommissioning in our Modified Alternative B that were in LSR with a stand age less than 80 years old. Under the NWFP forest restoration or thinning is allowed in these stands to the extent that it furthers the goals of managing for old-growth characteristics. Almost all of this mileage included LSR stands that were mixed in age between over and under 80 years of age. We understand that there may be an inclination and opportunity to access these stands for forest restoration before they graduate in age beyond 80 years old. Even if funds are available to prioritize such activities, making a decision as part of this ATM does not preclude that opportunity. Just as roads slated for decommissioning as part of this ATM will not actually be decommissioned until specific funding is obtained, there is no reason to exclude these mixed-age LSR stands from a future decommissioning decision as part of this ATM. Additionally, because the window of opportunity for forest restoration under the NWFP for these stands is limited, it makes sense to decide their ultimate objective maintenance level as part of this ATM plan.

Impacts on Timber Access from Road Decommissioning from Modified Alternative B			
	ALT B (EA)	Modified ALT B	ALT C (EA)
NWFP (Administratively Withdrawn)	0.1	1.2	2.7
NWFP (LSR, greater than 80 years)	5.5	16.4	18.6
NWFP (LSR, mix 80+ and 80-)	0.4	11.3	11
NWFP (LSR, less than 80 years)	0.3	0.3	8.7
NWFP (Matrix or Adaptive Management Area)	0	0	0

We also researched the aquatic risk analysis in the Sustainable Road Analysis for the road segments identified for decommissioning in both the action alternatives (B & C) as described by the EA and our Modified Alternative B. Road segments were rated as either “low,” “medium” or “high” aquatic risk. In addition to preserving key recreational access, our Modified Alternative B proposed a higher percentage of “moderate” and “high” rated road segments for decommissioning than either Alternatives B or C.

Aquatic Risk Factor (By Percentage) of Road Segments Proposed for Decommissioning			
Aquatic Risk Factor from 2015 MBSNF SRS	ALT B (EA)	Modified ALT B	ALT C (EA)
Low Aquatic Risk	85%	35%	43%
Medium Aquatic Risk	0%	1%	1%
High Aquatic Risk	15%	64%	56%

Road-To-Trail Conversion for North Fork Nooksack Road

As stated previously, we feel that road-to-trail conversion is an important tool as part of an ATM. The last 1.9 miles of the North Fork Nooksack Road (FS Road #3400) is a perfect candidate for a road-to-trail conversion. As stated in the EA the road is already operating as a trail and has not accommodated vehicle traffic for three decades:

> *The road has been closed since the bridge at Ruth Creek was removed in the mid-1980s. The segment of road beyond Ruth Creek has a dual designation as the Nooksack Cirque Trail #750 and is used by hikers to access Nooksack Cirque in North Cascades National Park. Under this proposal, the segment of Nooksack Cirque Road (FSR 34) beyond (south) Ruth Creek would not change. Under this proposal, the road segment would be removed from the road system inventory. (Pg. 132 of the EA)*

It is not clear why the section of this road already operating as a trail with a dual designation is not being formally converted to a trail. If the agency feels that no further action is needed to convert this road segment to a trail other than decommissioning the road from the system, we support that action. However, we want to ensure that any culvert removal or other aquatic restoration work would be done. To that end, we have included this 1.9 mile segment of the North Fork Nooksack Road beyond the North Fork Nooksack Trailhead to be decommissioned in our Modified Alternative B with continued use as a trail.

Minimum Thresholds for Maintenance Levels 2-5

While the important decisions of which road segments to decommission as part of this plan will have the most impact, we understand that decisions between objective maintenance levels 2-5 are also important. While we are not in a position to make specific recommendations on maintenance levels (ML) for every road segment, we do support a minimum ML for two different categories of road segments access recreational infrastructure (identified in Section 4 of this letter).

<u>Primary Access Roads</u>

Several roads in the project area are major trunk roads that directly access important recreational infrastructure or associated secondary roads and spur roads that in turn access trails, campgrounds and viewpoints. These main stem roads are those that have a four-digit road number ending with two zeros (i.e., 3900). We support a minimum maintenance level of 3 for the sections of these roads accessing the important recreational infrastructure identified in Section IV of this letter. The MLs for Alternative A and Alternative B as described in the EA as well as our recommendation for Modified Alternative B are listed in the table below.

Primary Road Maintenance Levels for Modified Alternative B			
Primary Road Segment from Section IV	ALT A (EA)	ALT B (EA)	Modified ALT B
FS 3100 to Damfino Lakes Trailhead	3&4	3&4	3&4
FS 3200 to road end	3	3	3
FS 3300 to Nooksack Falls Trailhead	3	3	3
FS 3400 to the Nooksack Cirque Trailhead	3	2	2
FS 3700 to Skyline Divide Trailhead	3	3	3
FS 3800 to Ridley Creek Trailhead	3	2	3
FS 3900 to Mt Baker Vista	3&5	3&5	3&5

While FS RD 3400 meets our general definition of a primary access route, in reality, based on its length and function it operates more as a secondary route. As a result, we are comfortable retaining a ML 2 for this segment in our Modified Alternative B.

Our Modified Alternative B is consistent with Alternative B on MLs for primary roads with one exception. We support maintaining FD RD 3800 as a ML 3 rather than an ML 2 (as proposed in Alternative B) to the Riley Creek Trailhead. This is a primary road and also provides important equestrian trailer access to several trails.

Secondary Roads

Several roads in the project area that branch off of primary roads provide important recreational access as well. They are defined by a four digit or seven-digit numbers (i.e., 3060. 3300-040). We support a minimum ML of 2 for the sections of these roads accessing the important recreational infrastructure identified in Section IV of this letter.

Secondary Road Maintenance Levels for Modified Alternative B			
Secondary Road Segment from Section IV	ALT A (EA)	ALT B (EA)	Modified ALT B
FS 3060 to High Divide Trailhead	3&1	2&1	3&2
FS 3040 to Church Mountain Trailhead	3&1	3&0	3&2
FS 3065 to Winchester Mountain Trailhead	3	3	3
FS 3070 to road end	2	2	2
FS 3071 to the second crossing of Anderson Creek	2	2	2
FS 3075 to road end	2&1	2&1	2&1

In the case of roads where the highlighted access is grooming for winter recreation ML 1 would be acceptable as the minimum threshold. This is the case for FS 3075.

Our Modified Alternative B is consistent with Alternative B on MLs for secondary roads with two exceptions. First, as discussed earlier in this comment letter, we do not support the end of FS RD 3040 being decommissioned as it would orphan trail access to the Church Mountain Trailhead. It should be maintained at a minimum of ML 2 to continue to provide access to this trailhead. Second, we do not support an ML 1 (CLOSED) for FS RD 3060 as it would orphan access to the High Divide Trailhead.

VIII. Conclusion

Finally, we would like to reiterate our support for this effort. The road system is becoming more fragile with each passing storm. We appreciate your attempt to remove unneeded roads, protect natural resources, maintain

important access routes, and target limited budgets to the roads we do use. A thoughtful, strategic approach can achieve positive results and move us closer to the goal of a "Sustainable Road System."

Sincerely,

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APPENDIX A

MBSNF INFRA Road DB (2012) Objective Maintenance Level DECOMMISSION							
#	ID	NAME	BMP	EMP	SEG LENGTH	OPER MAINT LEVEL	OBJECT MAINT LEVEL
1	3000050	COAL	0.15	0.3	0.15	1	D
2	3000055	HORN	0	0.2	0.2	1	D
3	3000058	NONAME	0	0.1	0.1	1	D
4	3000075	GALONE	0	0.6	0.6	1	D
5	3000076	SYLVESTER	0	0.3	0.3	1	D
6	3000080	GALENA CR	0	0.3	0.3	2	D
7	3010020	DAVIS CR	0	0.6	0.6	1	D
8	3010030	BOTTOMLESS	0	0.4	0.4	1	D
9	3010040	DEEP CR	0.6	1.5	0.9	1	D
10	3010042	HI-LO	0	0.6	0.6	1	D
11	3018000	HUMPY	0.1	1.1	1	1	D
12	3018020	GET UP	0	0.3	0.3	1	D
13	3019000	CONDOMINIUM	0	0.3	0.3	1	D
14	3035000	FOURMILE	0.2	1.2	1	1	D
15	3040000	EAST CHURCH	2.1	2.7	0.6	1	D
16	3040011	POWERLINE	0	0.3	0.3	1	D
17	3040111	POWERLINE	0	0.15	0.15	1	D
18	3060000	WELCOME PASS	0.7	1.2	0.5	1	D
19	3060000	WELCOME PASS	0	0.7	0.7	3	D
20	3065012	BOURNS POND	0.3	0.6	0.3	1	D
21	3065015	WEST SWAMP	0	0.2	0.2	1	D
22	3065019	SLIP OUT SPUR	0	0.2	0.2	1	D
23	3065020	MUD HOLE	0	0.6	0.6	1	D
24	3065021	SLACKLINE	0	0.2	0.2	1	D
25	3065023	KEEP KOOL	0.1	0.3	0.2	3	D
26	3066000	SWAMP CR	0	2	2	1	D
27	3066019	TWO GOATS	0	0.2	0.2	1	D
28	3070000	RAZOR HONE	2.5	3	0.5	2	D
29	3070020	WEST RAZOR	0	0.8	0.8	1	D
30	3070025	EAST RAZOR	0	0.2	0.2	1	D
31	3071000	ANDERSON CR	4.1	4.9	0.8	1	D
32	3071000	ANDERSON CR	2	4.1	2.1	2	D
33	3071017	ANDERSON SPUR	0	0.8	0.8	1	D
34	3071020	BAROMETER CR	0	0.8	0.8	1	D
35	3071025	ADVERSE POINT	0	0.7	0.7	1	D
36	3075000	WHITE SALMON	1.6	1.9	0.3	1	D

37	3075010	3075010	0	0.3	0.3	1	D
38	3075100	3075100	0	0.1	0.1	1	D
39	3080012	RIDGE SPUR	0	0.8	0.8	1	D
40	3100018	LORETTA	0	0.4	0.4	1	D
41	3120000	WEST CHURCH	3.3	4.3	1	2	D
42	3120011	POKE SPUR	0	0.5	0.5	1	D
43	3120013	NONAME SPUR	0	0.2	0.2	1	D
44	3120015	BEECHES SPUR	0	0.4	0.4	1	D
45	3120016	JAN SPUR	0	0.5	0.5	1	D
46	3120030	BUMP SPUR	0	0.5	0.5	1	D
47	3120033	NORTH SLOPE	0	1.7	1.7	1	D
48	3120035	BLOOPER	0	0.2	0.2	1	D
49	3120037	DISMAL	0	0.4	0.4	1	D
50	3122000	LITTLE MTN	2.6	3.6	1	1	D
51	3122100	HURST SLUMP	0	0.5	0.5	1	D
52	3122110	TWO ENTRY	0	0.14	0.14	1	D
53	3124010	WEST RIDGE	0	0.3	0.3	1	D
54	3124012	TOPSY	0	0.2	0.2	1	D
55	3130000	KIDNEY CR	2.5	6.6	4.1	1	D
56	3132000	WESTERN	0.4	1.3	0.9	1	D
57	3132014	FUJII	0	0.4	0.4	1	D
58	3140000	CANYON RIDGE	6.8	8	1.2	1	D
59	3140025	BALD BOUNDARY	0	0.5	0.5	1	D
60	3140026	HEAD-N-SOUTH	0	1	1	1	D
61	3140040	KNOCK OUT	0	0.4	0.4	1	D
62	3142000	BANYON	0	1.5	1.5	1	D
63	3142012	BUD	0	0.3	0.3	1	D
64	3146000	BOUNDARY RD	0	1	1	1	D
65	3146010	ADD ON	0	0.5	0.5	1	D
66	3146011	WOBBLY	0	0.3	0.3	1	D
67	3150000	CANYON VIEW	0	0.8	0.8	1	D
68	3160013	BEE CR	0	0.9	0.9	1	D
69	3160015	EVERLAST	0	0.5	0.5	1	D
70	3160016	FOG	0	0.2	0.2	1	D
71	3170000	BEARPAW	1.3	2.8	1.5	2	D
72	3170012	OTS	0	0.4	0.4	1	D
73	3170020	CANYON LAKE	0	0.2	0.2	1	D
74	3170021	STAPLER	0	0.3	0.3	1	D
75	3200015	NANNY GOAT	0	1.4	1.4	1	D
76	3200016	BEFUDDLED	0	0.3	0.3	1	D
77	3200022	GOAT BEARD	0	0.3	0.3	1	D
78	3200024	SEFRIT	0	1	1	1	D
79	3200026	BABE	0	0.3	0.3	1	D
80	3300000	WELLS CR	5.2	5.61	0.407	2	D
81	3300000	WELLS CR	5.61	12	6.393	2	D

82	3300018	MAD MIRA	0	0.6	0.6	1	D
83	3300020	EAST COUGAR	0	0.2	0.2	1	D
84	3300025	KITTY	0	0.1	0.1	1	D
85	3300030	KNOB	0	0.1	0.1	2	D
86	3310000	PINUS LAKE	1	3.4	2.4	2	D
87	3310011	ROCK SPUR	0	0.4	0.4	1	D
88	3400000	NO FK NOOKSACK	1	2.9	1.9	1	D
89	3400000	NO FK NOOKSACK	0	1	1	3	D
90	3600000	GROUSE BUTTE	4	5	1	2	D
91	3600011	SUMMIT VIEW	0	0.5	0.5	1	D
92	3600012	CABIN PLUNDER	0	0.1	0.1	1	D
93	3620014	ROCKY POINT	0	0.5	0.5	1	D
94	3620020	BRENDA SPUR	0	0.4	0.4	1	D
95	3630000	ELK HORN	1.4	1.9	0.5	2	D
96	3700025	UPPER BURNT KNOB	0	1	1	1	D
97	3700026	LOWER BURNT KNOB	0	0.3	0.3	1	D
98	3700030	TAIL HOLD	0	0.7	0.7	1	D
99	3700032	TRISH	0	0.7	0.7	1	D
100	3700033	DRY HORSE	0	0.4	0.4	1	D
101	3700035	GOOFED	0	0.3	0.3	1	D
102	3700036	CASCADE CREEK	0	0.5	0.5	1	D
103	3700040	JUMP OFF	0	0.2	0.2	1	D
104	3700050	JUMP OFF	0	0.2	0.2	1	D
105	3800000	MID FK NOOKSACK	4.6	7	2.4	3	D
106	3800000	MID FK NOOKSACK	12.3	14.3	2	2	D
107	3800000	MID FK NOOKSACK	7	12.3	5.3	3	D
108	3800023	RIDLEY CR	0	0.1	0.1	3	D
109	3900012	OLD GLACIER	0	0.3	0.3	1	D
110	3900013	SAMPSON CR	0	0.2	0.2	1	D
111	3900018	LO LO	0	0.5	0.5	1	D
112	3910000	THOMPSON CR	1.9	2	0.1	2	D
113	3910010	LAME DUCK	0	1.3	1.3	1	D
114	3910025	PRIVY	0	0.3	0.3	1	D
115	3910030	COMPTON SPUR	0	0.3	0.3	1	D
116	3910105	SOPHIE	0	0.2	0.2	1	D
117	3912000	THOMPSON RIDGE	0	0.5	0.5	1	D
118	3912020	TOMMY GUN	0	0.4	0.4	1	D
119	3914000	BEAVER CR	0.11	0.7	0.59	2	D
120	3940020	NORTH SMITH	0	0.5	0.5	1	D
TOTAL MILES					**85.03**		

APPENDIX B

Comparison of Decommissioned Roads in Modified Alternative B with Other Action Alternatives										
ID	NAME	BMP	EMP	SEG LENGTH	OPER MAINT LEVEL	OBJ MAINT LEVEL	ALT B DECOM	MOD ALT B DECOM	ALT C DECOM	NWFP (Stand Age)
300025	GARBAGE CUTOFF	0	0.4	0.4			0.4	0.4		
3000050	COAL	0.15	0.3	0.15	1	D		0.15	0.15	LSR (80+)
3000050	COAL	0	0.15	0.15				0.15	0.15	LSR (80+)
3000058	NONAME	0	0.1	0.1	1	D	0.1	0.1	0.1	LSR (80+)
3000075	GALONE	0	0.6	0.6	1	D		0.6	0.6	LSR (80+)
3000076	SYLVESTER	0	0.3	0.3	1	D		0.3	0.3	LSR (80+)
3010020	DAVIS CR	0	0.6	0.6	1	D		0.6	0.6	LSR (80+)
3010030	BOTTOMLESS	0	0.4	0.4	1	D		0.4	0.4	LSR (80+)
3010040	DEEP CR	0.6	1.5	0.9	1	D			0.9	LSR (80-)
3010042	HI-LO	0	0.6	0.6	1	D			0.6	LSR (80-)
3017000	YACC CAMP	0	0.1	0.1			0.1	0.1		LSR
3017000	YACC CAMP	0.1	0.4	0.3					0.3	LSR
3018000	HUMPY	0.1	1.1	1	1	D			1.1	LSR (80-)
3018020	GET UP	0	0.3	0.3	1	D			0.3	LSR (80-)
3019000	CONDOMINIUM	0	0.3	0.3	1	D	0.3	0.3	0.3	LSR (80-)
3035000	FOURMILE	0.2	1.2	1	1	D		1	1	LSR (Mix)
3040000	EAST CHURCH	2.1	2.7	0.6	1	D	0.6		0.6	LSR (Mix)
3040011	POWERLINE	0	0.3	0.3	1	D	0.3	0.3		LSR (Mix)
3040111	POWERLINE	0	0.15	0.15	1	D	0.15	0.15		LSR (Mix)
3060000	WELCOME PASS	0.7	1.2	0.5	1	D			0.5	LSR (80+)
3065012	BOURNS POND	0.3	0.6	0.3	1	D			0.3	LSR (80-)
3065019	SLIP OUT SPUR	0	0.2	0.2	1	D			0.2	LSR (80-)
3065020	MUD HOLE	0	0.6	0.6	1	D		0.6	0.6	LSR (Mix)
3065021	SLACKLINE	0	0.2	0.2	1	D		0.2	0.2	LSR (80+)
3065023	KEEP KOOL	0	0.1	0.1				0.1	0.1	LSR (Mix)
3065023	KEEP KOOL	0.1	0.3	0.2	3	D		0.2	0.2	LSR (Mix)
3066000	SWAMP CR	0	2	2	1	D			2	LSOG (80-)
3066019	TWO GOATS	0	0.2	0.2	1	D			0.2	LSR (80-)
3075010	3075010	0	0.3	0.3	1	D			0.3	LSOG (80-)
3075011	SALMON PATTERN	0.3	0.5	0.2					0.2	LSR (80-)
3096000	ALPINE VISTA	0	0.12	0.123			0.123	0.123		AW
3100015	LOWER HURST CREEK	0	1	1			1	1	1	LSR (80+)
3100018	LORETTA	0	0.4	0.4	1	D	0.4	0.4	0.4	LSR (Mix)
3100444	3100444	0	0.2	0.2				0.2	0.2	LSR (Mix)
3140025	BALD BOUNDARY	0	0.5	0.5	1	D			0.5	AW- MHZ
3140026	HEAD-N-SOUTH	0	1	1	1	D			1	AW- MHZ
3140040	KNOCK OUT	0	0.4	0.4	1	D		0.4	0.4	AW- MHZ

3140045	NW CORNER	0	0.4	0.4				0.4	0.4	AW- MHZ
3140045	NW CORNER	0.4	0.5	0.1				0.1	0.1	AW- MHZ
3140046	UPTOP	0	0.2	0.2				0.2	0.2	AW- MHZ
3200015	NANNY GOAT	0	1.4	1.4	1	D		1.4	1.4	LSR (Mix)
3200016	BEFUDDLED	0	0.3	0.3	1	D		0.3	0.3	LSR (Mix)
3200024	SEFRIT	0	1	1	1	D			1	LSR (80-)
3200026	BABE	0	0.3	0.3	1	D			0.3	LSR (80-)
3400000	NO FK NOOKSACK	1	2.9	1.9	1	D		1.9	1.9	LSR (Mix)
3600000	GROUSE BUTTE	4	5	1	2	D			1	LSR (80-)
3700000	DEADHORSE	12.5	12.8	0.3			0.3	0.3	0.3	LSR (80+)
3700030	TAIL HOLD	0	0.7	0.7	1	D	0.7	0.7	0.7	LSR (80+)
3700036	CASCADE CREEK	0	0.5	0.5	1	D		0.5	0.5	LSR (Mix)
3700050	JUMP OFF	0	0.2	0.2	1	D		0.5	0.5	LSR (80+)
3800000	MID FK NOOKSACK	12.3	14.3	2	2	D			2	LSR
3900012	OLD GLACIER	0	0.3	0.3	1	D	0.3	0.3	0.3	LSR
3900013	SAMPSON CR	0	0.2	0.2	1	D			0.2	LSR
3900014	THREE RIDGES	0	1	1				1	1	LSR (80+)
3900015	SCAB	0	0.4	0.4				0.4	0.4	LSR (80+)
3900018	LO LO	0	0.5	0.5	1	D		0.5	0.5	LSR (80+)
3910000	THOMPSON CR	1.9	2	0.1	2	D		0.1	0.1	LSR (80+)
3910000	THOMPSON CR	2	2.7	0.7				0.7	0.7	LSR (80+)
3910000	THOMPSON CR	2.7	4.3	1.6				1.6	1.6	LSR (80+)
3910010	LAME DUCK	0	1.3	1.3	1	D		1.3	1.3	LSR (80+)
3910025	PRIVY	0	0.3	0.3	1	D		0.3	0.3	LSR (80+)
3910030	COMPTON SPUR	0	0.3	0.3	1	D	0.3	0.3	0.3	LSR (80+)
3910105	SOPHIE	0	0.2	0.2	1	D		0.2	0.2	LSR (80+)
3912000	THOMPSON RIDGE	0	0.5	0.5	1	D	0.5	0.5	0.5	LSR (80+)
3912020	TOMMY GUN	0	0.4	0.4	1	D	0.4	0.4	0.4	LSR (80+)
3914000	BEAVER CR	0.11	0.7	0.59	2	D		0.59	0.59	LSR (Mix)
3916000	OLD GRADE	0	2.8	2.8				2.8	2.8	LSR (80+)
3940000	SMITH BASIN	0	2.1	2.1				2.1	2.1	LSR (Mix)
3940020	NORTH SMITH	0	0.5	0.5	1	D		0.5	0.5	LSR (Mix)
394022	PALISADES	0	0.7	0.7				0.7	0.7	LSR (Mix)
394025	UPPER SMITH	0	0.5	0.5				0.5	0.5	LSR (Mix)
TOTALS:							**5.973**	**28.863**	**41.29**	