



November 17, 2017

Peter Forbes, District Ranger

Mt. Baker Ranger District

810 State Route 20

Sedro-Woolley, WA 98284-1263

Submitted electronically to: comments-pacificnorthwest-mtbaker-snoqualmie-darrington@fs.fed.us

RE: Darrington Ranger District Emergency Road Repairs

Dear District Ranger Forbes,

Thank you for the opportunity to provide comments on the scoping notice for several road repairs on the Darrington Ranger District.

The undersigned conservation and recreation organizations support a common ground approach to the national forest road system. We believe that you can both prioritize the repair and maintenance of Forest Service roads that provide access to recreational infrastructure like trails, campgrounds or parking areas while also properly decommissioning old decaying logging roads that pose high aquatic risks to the watershed and have not provided important access. Additionally, many roads on the Forest are important to Tribes who rely on them for their own access for cultural activities and exercising their treaty rights relating to hunting and fishing.

The Mt. Baker-Snoqualmie National Forest has taken a leadership role responding to an agency-wide requirement for all national forests to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns when the Forest developed a Sustainable Road Strategy (SRS). The Forest took the additional step of providing opportunities for extensive public input into the sustainable roads strategy and then investing in two NEPA-based watershed based Access Travel Management (ATM) plans for the Nooksack and Greenwater watersheds, which made specific road decisions for implementing the SRS.

Support for Darrington Ranger District Road Repair Projects Restoring Recreational or Tribal Access

We support the following road repair projects that provide important recreational or tribal access. None of these road segments were identified as “unneeded” as part of the recent Sustainable Roads Analysis by the Mt. Baker-Snoqualmie National Forest. We expect that the repairs and overdue maintenance on these road segments will help reduce both risks to aquatics and loss of access from future road-washouts.

Rat Trap Pass Road, NFS Road 27, MP 6.9 - The Forest’s SRS analysis identified this road as a “medium” need for recreation providing access to the proposed Bull Bear Trail which will provide access to Meadow

Mountain and Crystal Lake Trails for hiking, equestrian and mountain biking opportunities. The Forest's SRS analysis also indicated this road as "high" risk for aquatics

Upper Tenas Creek Bridge, NFS Road 2660, MP 4.2 – The Forest's SRS analysis identified this road as a "medium" need for recreation providing access to Boulder Lake Trailhead for hiking opportunities and access to the Glacier Peak Wilderness. The Forest's SRS analysis also indicated this road as "high" risk for aquatics.

NFS Road 2810, MP 2.3 – The Forest's SRS analysis identified this road as a "medium" need for recreation providing access to North Mountain Lookout for recreational opportunities. The Forest's SRS analysis also indicated this road as "high" risk for aquatics.

Red Bridge Campground Road, NFS Road 4036, MP 0.1 – The Forest's SRS analysis identified this road as a "high" need for recreation providing access to Red Bridge Campground for hiking and camping opportunities. The Forest's SRS analysis also indicated this road as "low" risk for aquatics.

Sunrise Mine Road, NFS Road 4065, MP 1.15 – The Forest's SRS analysis identified this road as a "high" need for recreation providing access to the Sunrise Mine Trail for hiking and climbing opportunities. The Forest's SRS analysis also indicated this road as "high" risk for aquatics.

Deer Creek Road, NFS Road 4052, MP 2.22, 2.55, 3.0 & 3.7 – The Forest's SRS analysis identified this road as a "medium" need for recreation providing access to Kelcema Lake and Deer Creek Pass Trails for hiking, fishing, snowshoeing, cross country skiing and sledding opportunities. The Forest's SRS analysis also indicated this road as "high" risk for aquatics.

Question Regarding the Peek-A-Boo Road (2083) Repair Project

The notification identifies a road repair on the Peek-A-Boo Road (NFS Road 2083, MP 0.1). The Forest's SRS analysis identified this road as a "low" need for recreation providing administrative access to a rock pit. The road repair is located on an open section of the road. The Forest's SRS analysis also indicated this road as "high" risk for aquatics.

This is the only road repair segment that does not restore recreational or tribal access. It is our understanding that additional road damage has occurred on the Goodman Road (NFS Road 2081) that is preventing access to this road as well as NFS Road 2086 and the Peek-A-Boo Lake Trail head. It is not clear why this road segment was prioritized for repair over the storm damage on NFS Road 2081. Will there be an effort to repair the damage on NFS Road 2081?

Road Repairs Should Preserve and Enhance Recreational and Tribal Access and Alleviate Aquatic Risk Concerns

We would like to stress that all of these roads are rated as high risk to aquatics. This is largely due to their location next to rivers or within riparian areas. These areas also provide a wealth of outdoor recreation opportunities. This project provides an opportunity to complete repairs and maintenance in a manner that protects aquatic species and clean water while also ensuring recreational access. It is our understanding that Federal Highways, which provides funding for this type of work, generally only replaces "as is." We encourage the agency to view this as an opportunity to repair the road to current standards according to the Forest Service and State of Washington (e.g., larger culverts, create adequate road drainage, diffuse water across the landscape and install appropriate features to "stormproof" these roads) ensuring that impacts to rivers and fish are minimized moving forward.

Road Repair Projects Should Not Impact Inventoried Roadless Area, Old Growth Forest or Existing Wilderness Boundaries

Based on the information provided, it is our understanding that none of these important road repairs will impact inventoried roadless area boundaries, old-growth forests or existing Wilderness boundaries. These are all important values that are underrepresented on the landscape and are afforded administrative or legislative protections.

Thank you for the opportunity to comment on this important project.

Sincerely,

Tom Uniack
Executive Director
Washington Wild
tom@wawild.org

Don Parks
Co-Chair, National Forest Committee
Washington Chapter of the Sierra Club
dlparks398@gmail.com

Marlies Wierenga
Pacific Northwest Conservation Manager
WildEarth Guardians
mwierenga@wildearthguardians.org

Yvonne Kraus
Executive Director
Evergreen Mountain Bike Alliance
yvonne@evergreenmtb.org

Pam Borso
President
North Cascades Audubon Society
borsope@aol.com

Andrea Imler
Advocacy Director
Washington Trails Association
aimler@wta.org

Ben Greuel
Washington State Regional Director
The Wilderness Society
benjamin_greuel@twsw.org

Wendy McDermott
Director, Rivers of Puget Sound & Columbia Basin
American Rivers
wmcdermott@americanrivers.org

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers
katherineh@mountaineers.org

Kathy Young
President
Back Country Horsemen of Washington
president@bchw.org

Hilary Eisen
Recreation Planning and Policy Manager
Winter Wildlands Alliance
heisen@winterwildlands.org

Thomas O'Keefe
Pacific Northwest Stewardship Director
American Whitewater
okeefe@americanwhitewater.org

Joe Sambataro
NW Regional Director
Access Fund
joe@accessfund.org

CC: Forest Supervisor Jamie Kingsbury
Congresswoman Suzan DelBene
Senator Patty Murray
Senator Maria Cantwell