

October 7, 2022

Glenn Casamassa, Regional Forester
USDA Forest Service - Pacific Northwest Region
1220 SW Third Ave.
Portland, OR 97204-3440

Dear Regional Forester Casamassa:

As members of the Washington Watershed Restoration Initiative (WWRI), we are writing to provide our initial input regarding Legacy Roads and Trails (LRT) program funding for projects in FY23.

The WWRI has successfully advocated for congressional funding of the LRT program since the program's inception in 2007, and we appreciate our good working relationship with the Forest Service to make the most effective use of this funding in Washington State. Recognizing the value and continuing need for the LRT program, Congress last year permanently authorized the LRT program through the Infrastructure Investment and Jobs Act (IIJA) and provided \$250 million to the Forest Service to implement the program for five years starting in 2022. The IIJA states that during the annual LRT project selection process the Forest Service must "solicit and consider public input regionally in the ranking of projects for funding..."¹ We do not believe public input was solicited during the FY22 process and look forward to working with our Forest Service partners in FY23 and beyond to provide critical input to the project selection process consistent with Congressional intent.

In FY23, we strongly support the Region's proposal to focus LRT funding on the three western Washington national forests – the Olympic, Mount Baker-Snoqualmie (MBS), and Gifford Pinchot (GP). Furthermore, a substantial portion of the funding should be used for road decommissioning and road-to-trail conversions. While we are glad that the Snoquera Project in the MBS received significant LRT funding in FY22, neither the Olympic nor the GP received any funding. We are also concerned that none of this year's LRT funding for Snoquera or elsewhere in Region 6 reportedly can be used for road decommissioning. **No LRT funding for two of the three westside national forests and no LRT funding for road decommissioning region-wide are glaring omissions in the FY22 program that must not be repeated in 2023.**

The Olympic, MBS, and GP are in dire need of LRT funding to combat the environmental impacts of severe flooding and erosion during winter storm events that are worsening due to climate change. Analogous to the wildfire crisis affecting eastside forests, the westside forests are at risk of catastrophic flood events exacerbated by climate change. They are typically in the crosshairs of "atmospheric rivers" from the Pacific Ocean that dump copious amounts of water over short intervals of time in the Olympic and Cascade Mountains, often overwhelming road

¹ Sec. 40801, Public Law 117-58

drainage systems, plugging culverts, and causing landslides. The result is severe water quality and environmental impacts and loss of public access.

For the past 15 years, the Forest Service has relied on LRT funding to accomplish road decommissioning and road-to-trail conversions to achieve watershed restoration. Monitoring and research have confirmed that these road management techniques are highly effective in reducing the harmful impacts of roads on water quality and fish habitat. Years of roads analysis, access and travel management planning (ATM), and watershed restoration action planning (WRAP) have identified many hundreds of miles of roads in the Olympic, MBS, and GP that should be decommissioned or converted to trails.

For example, in the Olympic National Forest, the Middle Dungeness WRAP was adopted in 2016 after extensive collaboration, environmental and transportation analysis, and public involvement. The Middle Dungeness WRAP identified 13.8 miles of road decommissioning and 4.6 miles of road-to-trail conversions, along with 54.8 miles of road upgrades, as “essential projects” to restore the at-risk watershed to a properly functioning condition. These road projects, which were estimated in 2016 to cost a total of \$2.1 million, are prime candidates for LRT funding.

Similarly, in the MBS National Forest, the Snoquera Decision (signed 2020) is set to decommission 24 miles of road, helping to also implement the 2017 Greenwater ATM and 2020 Lower Greenwater WRAP – only 0.6 miles of road have been decommissioned thus far. Unfortunately, the recent North Fork Nooksack Management Decision misses the opportunity to support implementation of the 2017 North Fork Nooksack ATM, which authorizes 36 miles of road decommissioning in this steep, landslide-prone basin. LRT funding continues to be critical to “right-sizing” the MBS road system, storm-proofing for mounting climate impacts, and achieving WRAP outcomes as prioritized by the USDA Watershed Condition Framework.

During the 2015 planning process for the GP National Forest’s Travel Analysis Plan, the Forest Service identified 249 miles of roads in need of decommissioning (at an estimated cost of \$2,739,000) and 826 miles as candidates for closure (at an estimated cost of \$7,434,000). The large majority of these road projects remain in need of implementation. For example, in the Yellowjacket and Upper Wind priority watersheds over 20 miles of roads needing closure are outlined in their associated WRAPs and have already gone through the NEPA process. A lack of funding has delayed this on-the-ground work. Additionally, at least 14 Aquatic Organism Passage projects (AOPs) await implementation in these priority watersheds.

The success of the LRT program is legendary. We are grateful to see LRT dollars flowing again, and it is important that these dollars land in the right places for the right purposes. We look forward to working with you to support Washington forest needs and LRT project implementation. Thank you for considering this input from WWRI members as you consider how to utilize LRT funds in FY23 and beyond.

Sincerely,

Mike Anderson, Senior Resource Analyst
The Wilderness Society

Tom Uniak, Executive Director
Washington Wild

Thomas O'Keefe, PNW Stewardship Director
American Whitewater

Ryan Talbott, PNW Conservation Advocate
WildEarth Guardians

Shiloh Halsey, Director of Programs
Cascade Forest Conservancy

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Patricia A. Jones, Executive Director
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Tom Hammond
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Bill Deery, President
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Rebecca Wolfe
Sierra Club

cc:

Brian Staab, PNW Regional Hydrologist
Congresswoman Kim Schrier
Congressman Derek Kilmer
Senator Patty Murray
Senator Maria Cantwell