



November 30, 2015

Martie Schramm, District Ranger  
Snoqualmie Ranger District  
902 SE North Bend Way  
North Bend, WA 98045

**RE: Lower Greenwater Watershed Access Travel Management Project**

Dear District Ranger Schramm,

Thank you for the opportunity to provide comments on the scoping notice for the “Access Travel Management (ATM) Project” for the lower Greenwater subwatershed and parts of adjacent watersheds. 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.

We are aware of the many challenges the U.S. Forest Service 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 harvesting. Today, the road network continues to support forest management activities in addition to a strong recreation economy, with at least 90 percent of Washingtonians participating in outdoor activities each year generating \$21.6 billion dollars in expenditures and supporting 200,000 outdoor-oriented jobs<sup>1</sup>.

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

**Common Ground on Road Management**

We 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, there is significant common ground around maintenance priorities and restoration opportunities. Most Forest Service roads fall into two general categories: (1) 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,

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<sup>1</sup> Washington State Comprehensive Outdoor Recreation Plan (2013); Economic Analysis of Outdoor Recreation in Washington State (2015).

cultural, and/or social access; and (2) already functionally 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 are an engineering, ecological or financial cost that makes for a robust public debate (e.g., Stehekin, Dosewallips, etc.). Unfortunately, despite being a minute percentage of the overall road system, these difficult decisions receive much of the attention and often color the public narrative on Forest Service roads.

To that end, for nearly a decade a coalition of conservation, recreation, wildlife groups have joined with the Washington Department of Ecology through the Washington Watershed Restoration Initiative to support more than \$300 million of federal funding to address the legacy road problem. We encourage the Forest to use the Sustainable Roads Strategy (SRS) and Access and Travel Management (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.

### **Background on the Travel Management Rule**

The Travel Management Rule (referred to as “Subpart A”) in 2001<sup>2</sup> directed 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 (SRS).”<sup>3</sup> 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.”<sup>4</sup> 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 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.”<sup>5</sup>

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

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<sup>2</sup> 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A

<sup>3</sup> 36 C.F.R. § 212.5(b)(1)

<sup>4</sup> 36 C.F.R. § 212.5(b)(1)

<sup>5</sup> 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).

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.”<sup>6</sup> Although the Greenwater ATM scoping notice implies that the results of the MBS SRS analysis are incorporated into the proposed ATM, since the MBS has not yet released their SRS, we are unable to evaluate the extent to which the analysis has been used in the ATM process to date. In addition, it is unclear whether this ATM will use the SRS and now actually identify the “minimum road system”, in order to be fully compliant with Subpart A of the Travel Management Rule.

After reading through the scoping notice, we ask you to consider the following actions when drafting the Environmental Assessment, including:

**I. Allow the public to evaluate and understand the results of the SRS analysis to inform input on this proposal**

Our understanding is that the long-awaited sustainable roads analysis is expected to be released to the public by the end of the year. Unfortunately, the current scoping comment period ends before that release. As you know, a significant public engagement effort was launched by the MBS and many of our groups participated in that effort. We hope to see what the scoping notice says, namely that the SRS recommendations are used in the environmental analysis and that the public can clearly see the connection between the project and the SRS.

In addition to the SRS identifying opportunities for changing the forest transportation system, the foundation of the analysis is the road benefits and risks, which then are to be used to inform the site-based decisions in this project. We expect that forest-wide specialists analyzed risks – specifically aquatic and terrestrial risks – and will then address them in the NEPA analysis for the Greenwater project. Information from the SRS aquatic risks analysis is particularly important, given the recognition that the Greenwater watershed’s road densities (3.63 mi/mi<sup>2</sup>) exceed the targets in the current Forest Plan.

The watershed also is important for salmon recovery, other wildlife, and a source of clean water. As stated in the scoping notice, the Greenwater River and upper White provide habitat for Puget Sound Chinook salmon, Puget Sound Steelhead, and Coastal/Puget Sound Bull Trout which are federally listed as “threatened” under the Endangered Species Act. In addition, the Greenwater is one of only four spawning tributaries for the only remaining spring Chinook stock in south Puget Sound.

It will be very important that the MBS recognize that the public expects a clear explanation of how the SRS analysis is incorporated and be prepared for substantive feedback. In addition, during the draft plan comment period (since the opportunity for a comparison to the SRS will not be available in scoping) there will be added scrutiny by the public at the next stage in the analysis process.

**II. Re-evaluate what constitutes a “minimum road system”**

As forest road users and conservationists, we do understand that a strategic reduction in road miles does not necessarily equate to a loss of access. There are some roads that are already functionally closed, either

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<sup>6</sup> Memorandum from Joel Holtrop to Regional Foresters *et al.* re Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Nov. 10, 2010); Memorandum from Leslie Weldon to Regional Foresters *et al.* re Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Mar. 29, 2012); Memorandum from Leslie Weldon to Regional Foresters *et al.* re Travel Management Implementation (Dec. 17, 2013).

due to washouts, lack of use, or natural vegetation growth. There are other roads that 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.

According to Table 2 in the Public Scoping Letter, the proposed “minimum road system” achieved through decommissioning is just 5.4 percent smaller than the current road system (14 miles decommissioned). We support the Forest Service’s efforts to move forward with implementing the Sustainable Roads Strategy, but it is difficult to understand how sustainability is achieved when the change in system roads are minimal.

While the roads proposed for decommissioning are not individually listed in the scoping letter by segment and mileage, we were able to identify these roads in a version of the Forest Service’s INFRA database (2012) predating the sustainable roads analysis. We identified that about 32 miles of roads within the project area were identified with an Objective Maintenance Level of “Decommission.” (See Appendix A) Only three of those miles had been identified in the ATM for decommissioning, leaving 29 miles of roads segments as previously slated for decommissioning by the Mt. Baker Snoqualmie National Forest. This begs the question of why the recent sustainable roads analysis has resulted in an ATM process that identified fewer (rather than more) roads to be decommissioned than the previous planning information.

As you move forward with the NEPA analysis, we ask that you take a second look to determine if there are any other candidate roads that could be considered for decommissioning or closing – in particular, roads rated “high risk” for aquatic and terrestrial resources and low benefit for recreation and access (see description below).

### **III. Provide detailed description of how “high-risk” roads will be addressed.**

We appreciate the fact that one of the three purposes identified in the scoping notice is to “restore and protect the watershed’s ecology from impacts of the road system.” We feel this is an important element and needs to be carefully considered.

The SRS should have determined, across the forest, which roads are “high risk” for aquatic and terrestrial resources. If these “high-risk” roads have “low benefit” (e.g., access need), then they should be decommissioned. If these “high-risk” roads have “high benefit,” then they should be prioritized for strong maintenance, storm-proofing, best-management practice installations, and/or mitigation. Measures need to be taken that ensure the risks to aquatics is eliminated or significantly reduced. “Medium risk” roads should not be overlooked, either. For years, the Forest Service has failed to meet its obligations under the Clean Water Act and Washington’s Forest and Fish Regulations for addressing water quality impacts from roads.<sup>7</sup> Now that the SRS analysis is complete, we expect to see actions to address the problem areas identified.

In the Draft Environmental Assessment (EA), we recommend that the Agency take a second look at risk analysis from the SRS to determine if there are additional high/medium-risk roads with low/medium benefit that should be considered for closure or decommissioning. In addition, the specific measures that will be used to eliminate and/or reduce the “high risks” should be clearly outlined.

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<sup>7</sup> The USFS signed a Memorandum of Agreement with the Washington State Department of Ecology to meet responsibilities under the Federal and State Water Quality Laws in 2000. By 2005, all Forest Service roads in Washington State should have had completed (1) road management plans based on road analysis or road assessments to determine water quality effects and (2) an implementation schedule to address those issues.

#### **IV. Identify priority recreational access routes to be retained**

The area encompassing the Greenwater Access and Travel Management Project includes extremely popular hiking, horseback riding, mountain biking, hunting, dispersed camping and fishing opportunities. Given the popularity of the areas, a number of roads provide important access opportunities to trailheads and campgrounds. These important roads should be scored highly as to their benefits in a sustainable roads system and given significant consideration for retention and maintenance.

The following are roads (note: not an exhaustive list) within the Greenwater project area that provide access to recreation facilities:

- WA 410 including access to Skookum Falls and Mount Rainier Viewpoints, Silver Springs and The Dalles Campgrounds, Camp Shepherd Boy Scout Camp, Silver Creek Visitor Center, Alta Crystal Resort, White River, Buck Creek, Palisades and Skookum Flats Trails. (Hiking, Horseback Riding, Mountain Biking, Whitewater Paddling)
- FS 70 to Government Meadow Horse Camp including access to Twenty Mile, Midway and Pyramid Creek Sno Parks, Government Meadows Horse Camp and Maggie Creek and Naches Trails, and Greenwater River. (Hiking, Horseback Riding, Mountain Biking, Winter Recreation, Whitewater Paddling)
- FS 7010 to Greenwater River access at the bridge and Christoph Trailhead (Whitewater Paddling, Mountain Biking)
- FS 7030 to Kelly Butte Trailhead including access to Kelly Butte Lookout. (Hiking, Lookout Observation, Dispersed Camping, Whitewater Paddling)
- FS 7036/7036-110 to Colquhoun Peak Trailhead, Windy Gap, Pyramid Peak and Pacific Crest Trail. Road 7036-110 is reported as the primary way to access the PCT for trail maintenance purposes. (Hiking, Horseback Riding, Mountain Biking)
- FS 7080 to Government Meadows Trailhead with including access to Pacific Crest and Maggie Creek Trails. (Hiking, horseback riding)
- FS 7031/7033 to Greenwater Trailhead including access to Greenwater Lakes, Echo Lake, Lost Lake, Maggie Creek and Arch Rock Trails. (Hiking, Horseback Riding)
- FS 7032 to Divide Trail (Hiking, Horseback Riding, Mountain Biking)
- FS 7130: Christoph Trailhead (Hiking, Horseback Riding, Mountain Biking)
- FS 7190-510 to Crystal Mountain Trailhead. (Hiking, Horseback Riding, Mountain Biking)
- FS 7220/7222 to Noble Knob Trailhead. (Hiking, Horseback Riding, Mountain Biking)
- FS 7250 & 7250-210 to Dalles Ridge Trailhead including access to Dalles Ridge, Ranger Creek and Noble Knob Trails. (Hiking, Horseback Riding, Mountain Biking)
- FS 7174 to Corral Pass Campground including access to White River, Goat Falls, Rainier View, Castle Mountain, Noble Knob, Greenwater Lakes, Goat Falls and Corral Pass Trails and Corral Pass Campground. (Hiking, Camping, Mountain Biking, Backcountry Camping)
- FS 7176 to Goat Falls Trailhead and Half Camp Horse Camp. (Hiking, Horseback Riding)
- FS 7190 to Bullion Basin Trailhead including access to the Henskin Lake, Silver Creek, Norse Peak, Norse Peak View and Pacific Crest Trails, Sand Flats and Half Camp Horse Camps, Crystal Mountain Ski Resort. (Hiking, Horseback Riding, Backcountry Camping)

According to the ATM, a stated purpose of this project is to “maintain access across the Forest for a variety of users.” (p. 4) Noble Knob is one of the most popular trails in the Greenwater area. According to the ATM, all three roads (FS 7174, Corral Pass; FS 7250, Dalles Ridge and FS 7220/7222, Noble Knob) to this popular trailhead will be maintained at a Level 2, for high clearance vehicles. We cannot stress enough the

importance of keeping one of the roads as a Level 3, for passenger vehicles. Keeping one of the roads as a Level 3 increases access for people to visit Noble who may not own high clearance vehicles. Level 3 maintenance should also help to reduce erosion and sedimentation that less maintained roads may bring. According to Washington Trails Association, Noble Knob is one of Washington Trails Association’s “top 100” reported trails on the organization’s website.

**V. Consider Higher Maintenance Level or Road-to-Trail Conversion for Closed Roads Accessing Official Trailheads**

Surprisingly, a handful of official trailheads within the Greenwater area are currently accessed via closed roads. In a number of cases these are short spur roads. These roads are currently closed and the ATM recommends to keep them closed. This merits more consideration as to how access can be restored either by maintaining these road segments or considering a road-to-trail conversion as part of the ATM. For example, it appears that the only road segment that has been upgraded in maintenance level (from a level 2 to 3-5) is approximately four miles of FS 7060. This road does not appear to have any recreational destination in stark contrast to the closed road segments leading to established recreational trails listed below:

- Greenwater (FS Road 7033-110)
- Goat Falls (FS Road 7174-410)
- Norse Peak (FS Road 7190-410)
- Bullion Basin (FS Road 7190-410)
- Half Camp (FS Road 7176)

**VI. Explain rationale for the decrease in the balance between recommended road maintenance categories**

According to Table 2 in the scoping notice the recommended maintenance levels represent a significant change from the current maintenance level.

**Summary of Current Vs. Recommended Road Miles in Project Area**

Maintenance Level	Current Miles	%	Recommended Miles	%
3-5 (Passenger Vehicle Clearance)	136	52.5%	32	12.4%
2 (High Clearance Vehicle Only)	115	44.4%	45	17.4%
1 (Closed/Storage)	8	3.1%	168	64.9%
0 (Decommission)	0	0.0%	14	5.4%
<b>TOTALS</b>	<b>259</b>		<b>259</b>	

Given the purpose and need of the ATM, significant changes to the road maintenance levels would be expected. We appreciate that the state of the Forest Service road system has been unsustainable for decades given the current capacity, budgets and management obligations. This process requires some difficult choices.

However, there are a number of different ways to make those choices. The purpose and need established for this ATM includes both “restore and protect the watershed’s ecology from impacts of the road system” as well as “maintain access across the forest for a variety of users.”

The most striking reactions from the recommendations in Table 2 of the scoping notice are the following:

- Prioritize Recreation and Restoration: The two most relevant maintenance categories to the purpose and need of the ATM display the lowest levels of investment in the recommendations.
- Significant Decrease in Passenger Car Accessible Roads: 76% (104 of 136 miles) of road currently maintained for passenger vehicle use have been downgraded to high clearance access or closed.
- Limited Legacy Roads (not providing key recreational access) Identified for Decommissioning: Only 5.4% (14 of 259 miles) of the project road system has been identified for decommissioning.

We encourage the Forest to look hard at the distribution of maintenance levels and put additional investment in the two maintenance categories that will arguably do the most for the purpose and need of the ATM.

1. **Re-assess the miles of roads downgraded from passenger vehicle access.** Roads that provide important access to recreational opportunities and infrastructure (i.e., those listed in Section 4 of this comment letter) should be reassessed for maintenance for passenger vehicles. It is disconcerting to recreationists and community members who do not have access to a high-clearance vehicle. It becomes an equity issue when only those who can afford more expensive 4WD vehicles can reach trailheads.
2. **Re-assess the miles of roads slated for decommissioning.** The forest should make additional efforts to identify old decaying legacy roads on the system that do not provide recreational access and have high or medium aquatic risks to the watershed and recommend these road segments for decommissioning. This eliminates any ongoing maintenance costs, helps restore the watershed, alleviates the high road density issues and helps prioritize focus and resources for those roads that do provide recreational access. As discussed above and shown in Appendix A, there are nearly 30 miles of previously identified road segments in the INFRA database with an objective maintenance level of “Decommission” above and beyond the 14 miles identified for decommissioning in the ATM.

In addition to the recommendations above, we recommend that the Agency provide more rationale behind some of these decisions. It would help if the EA outlines which specific roads will be downgraded to ML2, what the reasoning is, and how remaining ML3-5 roads will benefit from the cost savings achieved. It would also help to understand why one road segment is decommissioned whereas another is simply closed.

## **VII. Provide additional detail on road maintenance costs and how the project meets the need for budgetary alignment**

The scoping notice identifies one of the project needs as: “There is a need for a smaller system of roads that can be maintained to desired standards and with future expected levels of maintenance funding, while also meeting standards for public safety.” Information from Table 2 of the Public Scoping Letter was analyzed and it appears that the currently proposed changes will result in a net savings of approximately \$423,000 per year – a 74 percent change (see Table A, below).

In only five years (2010-2015), the MBS Capital Improvements and Maintenance budget for roads (CMRD) alone has fallen over 40 percent to \$1,181,000 (in 2015). Estimates for annual maintenance of the entire MBS road system in a “like new” condition range as high as \$9M per year. Meanwhile, insufficient budget, leads to lack of maintenance, which then results in an enormous deferred maintenance burden (estimates as high as \$82M!).

For the SRS, Region 6 guidance directed that forests should align future road maintenance budgets with the average of the last 5 years of available funding. From the numbers included in the scoping notice, it appears that the MBS is seriously addressing the need to be in budgetary alignment. In the draft EA, we recommend that the Agency provide more detail around the costs for road maintenance in the Greenwater basin and how these changes align with expected future budgets. In addition, we would like to know whether these costs are for “basic” maintenance or the type of maintenance that is actually needed. What about bridges and culverts? And handling the deferred maintenance backlog? In addition, it may be useful to explain how these cost savings can help ensure other access roads are well taken care of.

Road Maintenance Level	Mtn. \$/Mile	Current Road Miles	Proposed Road Miles	Change (miles)	Current Cost	Proposed Cost
ML 3-5	\$3,686	136	32	-104	\$501,296	\$117,952
ML 2	\$633	115	45	-70	\$72,795	\$28,485
ML 1	\$28	8	168	+160	\$224	\$4,704
Decomm.	\$0	0	14	+14		\$0
<i>Totals</i>					<i>\$574,315</i>	<i>\$151,141</i>

**VIII. Determine whether there are unauthorized roads that need to be addressed**

The SRS should have evaluated all of MBS’s “system roads” which are the roads in the INFRA database. In some forests, there is a large network of “ghost roads” or unauthorized roads or orphan roads that are unaccounted for, are not in the database, yet continue to have impacts on natural resources.

In the Draft EA, we would like to know whether there are unauthorized roads in the Greenwater project area and how they will be addressed.

**IX. Incorporation of Salmon Recovery Plans and Watershed Plans**

According to the “Salmon Habitat Limiting Factors Report for the Puyallup River Basin, WRIA 10 (July 1999) “both the upper Puyallup and upper White River watersheds suffer from present and past timber harvest practices that reduce the ability for riparian areas to provide wood and shade to the river and stream channels and continue to contribute fine sediments from road construction and landslides.” Sediment inputs can be reduced with proper road maintenance, road stormproofing and road decommissioning. This ATM project would occur in the upper White River watershed and has the potential to provide benefit to salmon habitat.

The USFS has also consistently worked to improve aquatic habitat and watershed conditions, most recently under the “Watershed Condition Framework.” According to the Agencies assessment of 12 watershed health indicators in the lower Greenwater sub-watershed, the roads/trails indicator is rated as a “3” – essentially the lowest score feasible – and indicates the watershed is in “poor” condition due to roads. 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.

<sup>8</sup> Costs are derived from MBS materials describing forest roads and annual road maintenance costs. Since ML3-5’s are combined in one category in the scoping letter, the costs for ML5, 4 and 3 were added together and averaged. (ML5 - \$5938, ML4(High) - \$5237, ML4(Low) - \$2151, ML3 - \$1419.)



In the Draft EA, we recommend that the USFS analyze how road projects will result in reduced road densities, reduced risk of mass wasting/landslides, specific improved road/trail maintenance and ultimately result in tangible improvements to aquatic habitat and watershed conditions. When the projects are completed, will the roads/trails indicator rating for these sub-watersheds change from “poor” to “good”? Will sediment delivery to important salmon streams be notably reduced? The draft EA should also outline the stream crossings/culverts that are barriers to fish passage, how these will be addressed, and how much habitat will be accessible to listed species post-project.

#### **X. Consider climate change impacts and adaptation recommendations**

Climate change intensifies the adverse impacts associated with roads. As the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience.<sup>9</sup> Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads, however, were poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations. And even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance needs.<sup>10</sup>

The USFS Pacific Northwest Research Station published a report titled “Climate Change Vulnerability and Adaptation in the North Cascades Region, Washington” (September 2014). The report describes the probable impacts resulting from changing climate and states (emphasis added):

“Hydrologic systems will be especially vulnerable as North Cascades watersheds become increasingly rain dominated, rather than snow dominated, resulting in more autumn/winter flooding, higher peak flows, and lower summer flows. **This will greatly affect the extensive road network in the North Cascades** (longer than 16 000 km), making it difficult to maintain access for recreational users and resource managers. It will also greatly reduce suitable fish habitat, especially as stream temperatures increase above critical thresholds.” (Abstract, p.1).

The abstract also highlights recommendations to prepare for such changes, namely:

“For roads and infrastructure, tactics for increasing resistance and resilience to higher peak flows include installing hardened stream crossings, stabilizing streambanks, designing culverts for projected peak flows, and upgrading bridges and increasing their height. For fisheries, tactics for increasing resilience of salmon to altered hydrology and higher stream temperature include restoring stream and floodplain complexity, reducing road density near streams, increasing forest cover to retain snow and decrease snow melt, and identifying and protecting cold-water refugia.” (Abstract, p.2)

In the Draft EA, we recommend you consider climate change impacts and adaptation recommendations.

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<sup>9</sup> USDA, Forest Service, *National Roadmap for Responding to Climate Change*, at 26 (2011), available at <http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>

<sup>10</sup> USDA, Forest Service, *Water, Climate Change, and Forests: Watershed Stewardship for a Changing Climate*, PNW-GTR-812, at 72 (June 2010), available at [http://www.fs.fed.us/pnw/pubs/pnw\\_gtr812.pdf](http://www.fs.fed.us/pnw/pubs/pnw_gtr812.pdf).

We would like to see which roads are prioritized for storm-proofing, particularly as they relate to accessing recreational destinations and/or have known water quality impacts. In addition, we would like to see where undersized and vulnerable culverts are to be replaced since this is essential to protect roads from blowing out during storms. Proper maintenance and storm-proofing of roads should be evaluated and prioritized, which will have positive benefits not only for ensuring access but also for protecting natural resources.

## Conclusion

Finally, we would like to re-iterate 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. We believe a thoughtful, strategic approach can achieve positive results and move us closer to the goal of a “Sustainable Road System” while both addressing aquatic risks from legacy roads and prioritizing roads that access key recreational opportunities. We look forward to reviewing the Draft Environmental Assessment and are available for further discussion, if warranted.

Sincerely,

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# Appendix A

<b>Mt. Baker Snoqualmie National Forest INFRA Road Database</b>			
<b>ID</b>	<b>SEG_LENGTH</b>	<b>OPER_MAINT_LEVEL</b>	<b>OBJECTIVE_MAINT_LEVEL</b>
7000260	0.21	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7000310	0.2	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7010210	0.6	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7010320	0.02	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7010350	0.08	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7010410	0.19	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7010410	0.75	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7010510	0.83	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7012110	0.19	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7012210	0.5	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7012360	0.2	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7015000	1.69	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7020000	0.4	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7021210	0.2	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7030110	0.54	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7030210	0.5	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7030211	0.1	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7032103	1.1	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7032105	0.5	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7036110	0.6	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7065210	0.2	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7140000	2.6	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7146000	0.6	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7150210	0.4	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7160110	0.2	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7160130	0.5	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7160320	0.1	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7200105	0.335	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7200138	0.1	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7200142	0.9	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7200151	0.5	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7200219	0.6	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7200223	0.5	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7200223	0.26	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7220000	1.466	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7220000	0.8	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7220110	0.225	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7220310	0.2	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7220324	1.02	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7222000	3.233	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7222210	0.54	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7222230	0.3	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7222310	0.3	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7222410	1.08	3 - SUITABLE FOR PASSENGER CARS	D - DECOMMISSION
7222510	0.7	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7224240	0.2	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7224250	0.2	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7224260	0.2	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7226110	0.5	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7250110	0.6	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7250112	0.3	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
7250230	0.4	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7250312	0.4	1 - BASIC CUSTODIAL CARE (CLOSED)	D - DECOMMISSION
7290000	2	2 - HIGH CLEARANCE VEHICLES	D - DECOMMISSION
	<b>31.859</b>		

Red Text indicates road segments that were identified in the Greenwater ATM for Decommissioning