



February 17, 2016

Joe Neal  
Skykomish Ranger District  
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**RE: Comment on the Forest Service’s Sultan Roads Decommissioning and Improvement Project Draft Environmental Assessment**

Dear District Ranger Neal:

Thank you for the opportunity to comment on the Sultan Roads Decommissioning and Improvement Project Draft Environmental Assessment within the Skykomish Ranger District. The purpose of the project is to align the Sultan Canyon road system with the MBS maintenance budget, riparian and water quality needs and public safety goals.

We support the overall goals of the project such as addressing potential impacts to water quality and aquatic risks, and improving watershed and forest resiliency by returning expensive and deteriorating forest roads to the wild. It is very encouraging to see the Skykomish Ranger District moving ahead on road projects that will help address many of the factors that continue to degrade ecosystems.

With the recent construction of the Sultan River Canyon Trail, the work in this basin provides an excellent example of how partnerships can be leveraged to remove a deteriorating and impassable road network while also increasing accessibility to the forest through the development of a new trail to the river.

**Support for Watershed Restoration**

Our organizations recognize the challenges around restoring healthy watersheds in our National Forests. The USFS’ Watershed Condition Framework assessment concluded that 78% of Washington’s watersheds are negatively impacted by roads. Yet road maintenance budgets dropped 82% since 1990. This is why we also support federal funding, including the Legacy Roads and Trails Remediation Initiative, which is targeted to address these specific watershed impacts. Legacy roads funds are applicable for project treatments that include road decommissioning, road stormproofing, restoring or enhancing fish passage on streams, trail reconstruction and road-to-trail conversions.

The negative impacts from roads to water, fish, wildlife, and ecosystems are significant and fully documented in scientific literature. See The Wilderness Society, Transportation Infrastructure and Access on National Forests and Grasslands: A Literature Review (May 2014) (attached as Exhibit A). Those adverse impacts are long-term, occur at multiple scales, and often extend far beyond the actual “footprint” of the road. The marbled murrelet is a listed species protected by the Endangered Species Act that may be present in the action area. Other listed species that may be impacted (positively or negatively) include the northern spotted owl, grizzly bear, and gray wolf. Downstream from the project area, the Sultan River is designated critical habitat for the Puget Sound Chinook

Salmon ESU. See 70 Fed. Reg. 52630, 52695 (Sept. 2, 2005). The Forest Service is expected to recognize the potential for cumulative impacts on these species.

Despite the daunting 370,000 miles of Forest Service system roads nationwide, we feel that common ground can be found to address the maintenance backlog. An important step is to identify decaying and poorly maintained old logging roads that have significant aquatic risk factors posing threats to watershed and fisheries health (e.g., clogged and undersized culverts, sedimentation, etc.) while not providing significant recreational or other access. These roads should be considered for decommissioning to offset the future maintenance costs. In turn, roads that provide access to recreational opportunities (e.g., trailheads, campgrounds, river access, other infrastructure, etc.) should be prioritized for the limited maintenance funds that do exist.

### **Support for Alternative 3**

We feel that Alternative 3 best meets the stated purpose and need of the project while addressing important issues raised in scoping by Snohomish PUD and the Tribes. Alternative 3 would decommission 4.1 miles of system and non-system roads which are currently inaccessible to public motorized use. Removing these roads will address potential impacts to the adjacent municipal watershed which supplies safe and clean drinking water to the City of Everett and much of south Snohomish County.

Alternative 3 also preserves a walking trail on the 6122 Road prism that would be maintained by Snohomish PUD under a Special Use permit. This trail will provide access to the north side of the Sultan River and, in addition to providing administrative access for Snohomish PUD, it could be used for recreation. If at some point in the future, when the PUD no longer has a need for the trail and does not renew their Special Use Permit, they should be responsible for removing any of the culverts on this access trail and ensuring that it is hydrologically stabilized.

We strongly support the Forest Service's proposal to remove the log stringer bridge at the end of 6122 North. The Forest Service notes that the log stringer bridge is in poor condition and could fall, harming boaters and blocking fish passage, as well as presenting an unacceptable safety risk. Blocking the Sultan River could lead to build up of sediment and flood debris in a storm, ultimately leading to catastrophic failure and major impacts. This project component is critical to ensuring stream passage, fish access to upstream habitat, and safe roads and access to public lands for local communities.

However, we would ask for justification of why the Proposed Action would re-establish the 6122-000 road prism past the Sultan River Canyon Trail across the 2003 landslide and place this road in storage. The EA does not provide clear written rationale of the management need for re-establishing this road only to place it in storage. We also have concerns regarding the effects of deconstruction noise, particularly explosives, on nesting marbled murrelets, spotted owls, and other wildlife which may be using the old growth habitat near the Sultan River. It was unclear whether any mitigation measures were included to work around the usual time windows to protect these species.

### **Consistency with Mt. Baker-Snoqualmie's Travel Analysis Report**

Given that the project is considering changes to the Forest Service's road system, we urge the agency to ensure that this project is consistent with the Mt. Baker-Snoqualmie National Forest's Travel Analysis Report (TAR), titled the "Forest-Wide Sustainable Roads Report" (December 2015). Based on the stated purpose and needs, this project provides a perfect opportunity to begin making on-the-ground progress towards an environmentally sustainable road network that can be supported by actual forest service budgets.

Implementing restoration projects that move the Mt. Baker Snoqualmie National Forest towards a minimum road system is incredibly important and long overdue. We support the purpose and need for this project and the goal of creating a sustainable road network.

Sincerely,

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