



May 27, 2016

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

RE: Lower Greenwater Watershed Access Travel Management Project Draft EA

Dear District Ranger Schramm:

Thank you for the opportunity to provide comments on the Draft Environmental Assessment (EA) for the “Access Travel Management (ATM) Project” in the Lower Greenwater Watershed. As conservation and recreation organizations 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 National Forest (MBSNF).

Many of our organizations submitted scoping comments in November 2015. We have noticed that the current Draft EA provides an additional alternative for consideration (Alt 3).

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 jobs¹.

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. With each passing storm, more roads wash out and we foresee this problem becoming worse with climate change. We recognize and support the need to make 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.

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

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. In fact, some are even overgrown with vegetation and are slowly “closing” themselves. 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.). 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 1 would fail to meet the purpose and need of this project.

As described in your announcement, the purpose of this project is to “establish a sustainable road system in the watershed.” The EA further points out “a need for a smaller system of roads that can be maintained to desired standards and within expected future levels of maintenance funding, while also meeting standards for public safety.” 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 ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

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)

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 1 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. The Draft EA Fails to include an acceptable range of alternatives based on the stated purpose and need

The three alternatives provided in the Draft EA do not provide a reasonable range of alternatives based on the purpose and need identified for the project which are as stated (Pg. 7-8 of the EA):

1. Need to restore and protect the watershed’s ecology from impacts of the road system
2. Need to establish a sustainable road system in the watershed
3. Need to maintain access across the forest for a variety of users

Alternative 1 arguably provides one end of a range by maximizing access (Need #3). Alternative 2 arguably embraces the agency’s sustainable roads analysis by attempting to identify a sustainable road system (Need #2).

It would be reasonable to expect an Alternative that maximizes the protection of the watershed from road impacts through decommissioning and other decisions (Need #1). This was the third alternative provided in the Nooksack ATM which recently went through the same EA process. However, this alternative does not exist in the Greenwater Draft Plan. Alternative 3 would propose decommissioning just 12 miles of roads, while Alternative 3 would decommission just 15 miles (while adding nearly 5 miles to the road system from unclassified roads).

Alternative 3 instead appears to be an Alternative that maximizes Tribal access based on our reading of the EA. We agree that Tribal access is an important factor to be considered in this plan and the concerns do not always mirror those of recreational or timber related access. However, this Alternative would have served the Draft EA better if it was a fourth Alternative rather than taking the place of an alternative that would maximize road decommissioning and watershed restoration activities as demanded by Need #1.

As a result we have put considerable effort into providing an Alternative that balances all three needs of the project (with particular attention to Need #1) while embracing the Tribal input embedded in Alternative 3.

IV. Prioritize road decommissioning without negatively impacting key recreational access opportunities

This ATM plan for the Lower Greenwater 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

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).

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.

Annual maintenance costs increase as you move up the scale (Maintenance Levels 1-5) for various road segments, but they exist to some extent at each level. Selectively decommissioning roads that do not provide access for recreational and specific Tribal use or are not inconsistent with restoration thinning goals is essential to creating a sustainable road system on this landscape. 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.

Leading up to the sustainable roads process and this specific ATM plan, the Mt. Baker-Snoqualmie National Forest had already identified approximately 32 miles of forest system roads within the project area with an objective maintenance level (OML) of “decommission” in the INFRA road database (2012). See Appendix A. Alternative 2 proposes to decommission about 12 miles of roads (including about 2 miles previously identified as OML decommission in the INFRA database). Alternative 3 proposes approximately 15 miles for decommissioning (including about 4 miles previously identified as OML decommission in the INFRA database).

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 these roads necessarily merit a maintenance level change to decommission as part of this plan. However, we would expect that the majority of these roads would meet the criteria of having current or long-term aquatic risks to the watershed and would support the purpose and need of this project if slated for decommissioning.

V. Prioritize maintenance of existing recreational access routes

The area encompassing the Greenwater Access and Travel Management Project includes extremely popular hiking, horseback riding, mountain biking, hunting, dispersed camping and fishing opportunities. A total of 29 trailheads access approximately 146.2 miles of maintained summer trails, and 3 trailheads that serve approximately 65 miles of groomed winter trails. 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 proper maintenance.

The following is a list of priority recreational access roads 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-eight Mile Creek, Midway and Pyramid Creek Sno Parks, Government Meadows Horse Camp and Maggie Creek and Naches Trails, and Greenwater River Trails. (Hiking, Horseback Riding, Mountain Biking, Winter Recreation, Whitewater Paddling)

- FS 7010 to Greenwater River access at the bridge and Christoff Trailhead (Whitewater Paddling, Mountain Biking)
- 7012 to Divide Access Trailhead (Hiking)
- FS 7030/7030-510 to Kelly Butte Trailhead including access to Kelly Butte Lookout. (Hiking, Lookout Observation, Dispersed Camping, Whitewater Paddling)
- FS 7031/7033 to Greenwater Horsecamp and Trailhead including access to Greenwater Lakes, Echo Lake, Lost Lake, Maggie Creek and Arch Rock Trails. (Hiking, Horseback Riding)
- FS 7032/7032-310 to Divide Ridge Trailhead (Hiking, Horseback Riding, Mountain Biking)
- FS 7034 to Sawmill Creek and Sawmill Ridge Trailheads (Hiking)
- FS 7036/7036-110 to Colquhoun Peak Trailhead and Windy Gap Trail. (Hiking, Horseback Riding, Mountain Biking)
- 7038-110 to Pyramid Creek Trailhead and Pacific Crest Trail (Hiking, Horseback Riding)
- FS 7065 to Naches Trail and including groomed Greenwater sno-park access (winter recreation)
- FS 7068 including groomed Greenwater sno-park access (winter recreation)
- FS 7080 to Government Meadows Trailhead with including access to Pacific Crest Trail, Maggie Creek and Naches Trails. (Hiking, horseback riding)
- FS 7125 to Grass Mountain and Cristoff Trailhead (Hiking, Mountain Biking)
- FS 7130: Christoff Trailhead (Hiking, Horseback Riding, Mountain Biking)
- FS 7172 to Deep Creek Trail (Hiking, Horseback Riding, Mountain Biking)
- FS 7174/7174-410 to Corral Pass Campground including access to White River, Goat Falls, Rainier View, Castle Mountain, Noble Knob, Greenwater Lakes, Ranger Creek, Goat Falls, Deep Creek 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/FS 7190-410 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)
- FS 7190-510 to Crystal Mountain Trailhead and Sand Flats Horsecamp. (Hiking, Horseback Riding, Mountain Biking)
- FS 7220/7222 to Noble Knob Trailhead. (Hiking, Horseback Riding, Mountain Biking)
- FS 7222-410 to George Lake Trail (Hiking)
- FS 7250 & 7250-210 to Dalles Ridge Trailhead including access to Dalles Ridge, Ranger Creek and Noble Knob Trails. (Hiking, Horseback Riding, Mountain Biking)

VI. 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.

We were concerned to see that in Section 2.1.1 (pg. 15) 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:

“The District Ranger decided not to have the team analyze an alternative in detail that considered converting roads to trails because (1) adding trails to the system was outside the scope of the project, which focused on roads, and (2) funds for maintaining (or upgrading) trails is also limited and declining, so a larger trail system may not be in alignment with trail budgets.”

We believe this perspective is shortsighted. Road-to-trail conversions can be an effective tool and solution in many cases to addressing the purpose and need stated for this project. For example, a short road segment or spur which accesses a trailhead but has high aquatic risk factors could be identified as a cost effective road-to-trail conversion. Such an option would reduce aquatic risks, preserve recreational access and reduce the road system fulfilling all three of the stated purpose and need statements for this project.

Making a decision to authorize a road-to-trail conversion does not mean that funding must be available in the current or 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. In addition, many of the road-to-trail projects on other parts of the MBSNF 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.

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

While we were able to access the aquatic risk factors for the road segments within the project area through the forest-wide sustainable roads analysis, it would have been helpful to include these rankings (i.e., low, medium, high) in the body or appendix of the EA.

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 1.3 Purpose and Need for the Proposal (pg. 7) of the EA lists the first need as “restore and protect the watershed’s ecology from impacts of the road system.”

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. Studies completed by the USFS Rocky Mountain Research Station show that road removal reduced sediment production by 80% and road improvements reduced sediment by 60% on average⁶. This ATM project would occur in the upper White River Watershed and has the potential to provide benefits 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 subwatershed, 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.

Additionally, the Green River Watershed, located along the northern portion of the project area, is the municipal watershed for the City of Tacoma. There is also a small municipal watershed area that provides water to the Crystal Mountain community within the Silver Creek – White River Subwatershed. These municipal watersheds should be a high priority for management that protect and maintain water quality.

VIII. Support for a Modified Alternative B

⁶ USDA Rocky Mountain Research Station. Science You Can Use Bulletin. March/April 2016. Issue 18.

As stated before, we feel that adoption of Alternative 1 will not meet the Purpose and Need identified for this action.

We feel that Alternative 2 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. Our understanding is that this alternative is based on the recommendations from the forest-wide Sustainable Roads System analysis for the Mt. Baker Snoqualmie National Forest. A significant part of the road system is placed in Level 1 (storage/closed), which would have important benefits to watershed restoration goals but continues annual maintenance costs and impacts important access to recreational opportunities.

Alternative 3 is focused on retaining access (with specific reference to Tribal access based on consultation with the Forest) however could go further with respect to some targeted road decommissioning. A significant amount of the road system is placed in Level 2, the lowest maintenance level for an open road. However, this seems like a tenuous position moving forward. Level 2 roads continue to require annual maintenance costs and are closest to reverting to a condition that will pose unacceptable aquatic risks on the watershed. In addition, level 2 roads do not qualify for Emergency Relief for Federally Owned Roads (ERFO) funding.

Despite the fact that a key identified purpose and need of this project is to reduce impacts from unmaintained roads on the watershed, we were surprised and concerned that no alternative looked to maximize road decommissioning in the EA, particularly given that this is a Tier 1 watershed and key for multiple fish species. Road decommissioning gives the biggest “bang for the buck” toward reducing aquatic risks on the watershed and creating a Sustainable Road System analysis by eliminating future maintenance costs. Given that this ATM is likely to be the most focused effort to create a sustainable road system on this landscape in the next decade, we feel that an alternative that maximizes road decommissioning for legacy road segments while prioritizing recreational access should be seriously considered.

Our understanding is 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 Conservation/Recreation Alternative which attempts to carefully balance additional road decommissioning while prioritizing roads that access trails, campgrounds, horse camps and other infrastructure.

Description of Conservation/Recreation Alternative

Most of Alternative 3 would be retained including the following elements which we support, including:

- “maintain access to all the developed sites within the project area. All FSR’s that provide access to developed sites and trailheads would remain open at a maintenance level 2 or above under this alternative. Additionally, the groomed snowmobile route that branches off the 7000 road and follows 7065 to 7068 and ties back in to the 7000 road would be remain open.” (Pg. 101 of the EA)
- “result in no loss of access to developed recreation sites. This alternative would not close or decommission any of the travel routes to developed sites and trailheads. This alternative would also leave access to FSR 7065 and FSR 7068 which provide a groomed loop for snowmobilers within the Greenwater Sno-Park.” (Pg. 102 of the EA)
- “not expected to adversely affect the ability of the fire management program’s ability to manage wildland fire within the project area in a cost effective manner. 33% of the analysis area would see a net positive change due to road closures that limit casual public activity but retain limited initial attack access.” (Pg. 98 of the EA)
- “decrease the potential magnitude of effect the road network has on water flow patterns. As improvements are made to road drainage and flow patterns improve, the connection of roadway runoff

with local stream channels is reduced as are the chronic effects of altered flow patterns on downstream geomorphic processes and ecohydrologic function.” (Pg. 58 of the EA)

- “effective road density would be reduced in some Project Area subwatersheds.” (Pg. 58 of the EA)
- “The number of culverts in the project area subwatersheds would be reduced from the existing condition. Alternative 3 would remove and stabilize conditions for 152 stream crossing culverts from the project area subwatersheds, reducing the drainage network extension due to Forest Service road in the Upper Greenwater River, Lower Greenwater River, and the Silver Creek-White River subwatersheds.” (Pg. 59 of the EA)
- “soil conditions would be improved over current conditions through decommissioning and storage treatments.” (Pg. 62 of the EA)

We suggest making the following adjustments to Alternative 3 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.

Additional Road Decommissioning Beyond Alternative 3

Alternative 2 proposes to decommission just 12 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 3 identifies just 15 miles of roads for decommissioning.

Road Decommissioning Comparison Between Alternatives	
Action Alternative	Miles of Road Decommissioning
Alternative 2	12
Alternative 3	15
Conservation/Recreation Alternative	42

In our Conservation/Recreation Alternative, we have identified 42 miles of roads (27 miles above and beyond Alternative 3) 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 (through the Objective Maintenance Level) in the Forest Service’s INFRA database. A full list of road segments slated for decommissioning as part of our Conservation/Recreation Alternative and other action alternatives can be found in Appendix B of this letter.

We included an additional 27 miles of road segments for decommissioning in our Conservation/Recreation Alternative above and beyond the 15 miles identified in Alternative 3. First we included 3.5 miles of roads identified in the EA for decommissioning from Alternative 2 which did not impact recreational access. Second, we identified 23.5 miles of road segments that were listed with an objective maintenance level (OML) in the Forest Service’s INFRA database as “decommission” that did not provide recreational access (as described in Sect. 4).

Summary of Sources of Road Decommissioning in Consv/Rec Alternative	
	Miles of Road Decommissioning
Decom roads included from Alt 3	15
Decom roads included from Alt 2	3.5
Decom Roads included from INFRA DB	23.5
Total Roads Decommissioned	42

Impact on Recreational Access

The Conservation/Recreation Alternative is focused on ensuring that roads accessing existing recreational opportunities be prioritized for future maintenance instead of being decommissioned or closed to public access. Several road segments were deliberately not included that were proposed for decommissioning or maintenance Level 1 (Closed) as part of Alternative 2 and 3 because of the impact they would have on key recreational opportunities. These include:

- FS RD 7065 which provides access as part of the Greenwater Sno-Park System and access to the Naches Trailhead (Proposed Closed in Alt 2)
- FS 7032-310 which provides access to the Divide Ridge Trail (Proposed Closed in Alt 2)
- FS RD 7222 which provides access to the Noble Knob Trail (Proposed Closed in Alt 2)
- FS RD 7033 which provides access to the Greenwater Lakes Trail (Proposed Closed in Alt 2)
- FS RD 7176-010 which provides access to the Goat Falls Trail (Proposed Closed in Alt 2)
- FS 7038-110 which provides access to Pyramid Creek and the Pacific Crest Trail (Proposed Decom in Alt 2)
- FS 7034 which provides access to Sawmill Ridge and Sawmill Creek Trails (Proposed Closed in Alt 2)
- FS RD 7125 which provides access to the Grass Mountain and Christoff Trails (Proposed Closed in Alt 2)
- FS 7190-410 which provides access to the Silver Creek Trail (Proposed Closed in Alt 2)

Impact on Recreational Infrastructure from Decommissioning/Closure in Modified Alternative			
	ALT 2 (EA)	Cons/Rec ALT	ALT 3 (EA)
Road miles providing current access to recreational infrastructure	17	0	0

Impact on Timber Access

We understand that retaining timber access is an important consideration for the agency. As described in the EA all three alternatives provide roaded access to over 97% of the potential timber harvest stands within the project area (Pg. 71 of the EA). Under Alternative 3 no roads accessing lands designated as matrix under the Northwest Forest Plan (NWFP) have been included. Additionally, only 421 acres of stands identified for potential restoration thinning designated as Late Successional Reserves (LSR) under the Northwest Forest Plan would not have roaded access under Alternative 3.

While we have added 25 miles of roads that were not identified in Alternative 2 or 3 to be decommissioned in our Conservation/Recreation Alternative, our alternative will not have significant impact on timber access.

As with Alternative 3 no road segments have been slated for decommissioning in the matrix designation under the NWFP which is managed for timber cutting. Road segments targeted for decommissioning within an Administratively Withdrawn designation under the NWFP have been included

Under the NWFP, forest restoration or thinning is allowed in Late Successional Reserves stands that are less than 80 years old to the extent that it furthers the goals of managing for old-growth characteristics. There may be an interest in accessing these stands for forest restoration before they graduate in age beyond 80 years old. Restoration thinning treatments to such stands often occur between ages 40 and 80 years old as a single treatment to encourage structural diversity and future old growth characteristics. After such restoration thinning treatments, it is common practice that the access roads to these timber stands be decommissioned at the end of

the project. In many cases through stewardship sales, the restoration thinning receipts are used to pay for the associated road decommissioning.

The fact that funds are not currently identified to prioritize specific restoration thinning activities should not preclude the opportunity to make a decision as part of this ATM on road decommissioning. 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 LSR stands from a future decommissioning decision as part of this ATM.

Impacts on Timber Access from Road Decommissioning from Consv/Rec Alternative			
	ALT 2 (EA)	Consv/Rec ALT	ALT 3 (EA)
NWFP (Administratively Withdrawn)	.5	.5	0
NWFP (Late Successional Reserve)	9.6	42	15
NWFP (Matrix or Adaptive Management Area)	.3	0	0
Unknown	1.6	0	0
TOTALS:	12	42	15

Impact on Aquatic Risk

We also researched the aquatic risk analysis in the Sustainable Road System Analysis for the road segments identified for decommissioning in both the action alternatives (2 & 3) as described by the EA and our Conservation/Recreation Alternative. Road segments were rated as either “low,” “medium” or “high” aquatic risk. In addition to preserving key recreational access, our Conservation/Recreation Alternative proposed a higher percentage of road segments for decommissioning rated “high” aquatic risk than either Alternatives 2 or 3.

Aquatic Risk Factor (By Percentage) of Road Segments Proposed for Decommissioning			
Aquatic Risk Factor from 2015 MBSNF SRS	ALT 2 (EA)	Consv/Rec ALT	ALT 3 (EA)
Low Aquatic Risk	48%	24%	31%
Medium Aquatic Risk	0%	17%	6%
High Aquatic Risk	38%	53%	50%
Unknown	14%	6%	13%

Impact on Tribal Access

We appreciate the treaty obligations and importance of federal lands to local Tribes for hunting and fishing rights, subsistence and cultural heritage. It is our understanding that a major focus of Alternative 3 was based on input from several Tribes to address their concerns related to access and natural resource protection.

It was difficult to access specific information in the EA regarding which road segments were assigned specific maintenance levels according to this input. Without such information it was difficult to make sure our alternative took into account Tribal feedback to the project.

In lieu of such information we decided deliberately to use Alternative 3 as a base for our Conservation/Recreation Alternative with the perspective that Tribal concerns would already be embedded in our final Alternative. Our intent was to prioritize maintenance for roads providing recreation access, avoid impacting needed forest health access roads, emphasize watershed restoration (especially through targeted road decommissioning), while recognizing Tribal concerns to the best of our ability.

Treatment of Non-System Roads

Alternative 3 identifies 16 miles of unclassified roads that should be addressed by this ATM process. Our understanding is that these roads have been obliterated by design or by nature over the past several decades and no longer provide vehicle access. It is reasonable to assume that absence regular maintenance, these road segments pose aquatic risks to the watershed. We find it puzzling why these non-system roads are only addressed in Alternative 3 in the EA.

Unfortunately, the EA does not provide aquatic risk data for these non-system road segments nor do they reference any specific recreational access or Tribal access needs for any of them. As a result, we assume that these non-system roads should be appropriately treated to address or prevent any long term aquatic risks (i.e., through decommissioning).

Without additional information we disagree with the proposal in Alternative 3 to add more than 5 miles of non-system roads to the official road system as described in the table below (from Pg. 20 of the EA).

Table 5. Miles of non-system roads proposed for treatment under Alternative 3.

Maintenance Level	Miles
2A – High Clearance with Authorized Access (Closed to the Public)	0.48
2 – High Clearance Vehicles	1.42
1 – Basic Custodial Care (Closed)	3.58
Decommission/obliterate	10.36
Total	15.84

By adding more than 5 miles of system roads, Alternative 3 would effectively provide only 10 miles of net road decommissioning making, it the lowest of the action alternatives.

Adding roads to the system does not meet the Purpose and Need of the project which states “There is a need for a smaller system of roads that can be maintained” (section 1.3.2).

Proposed Increases in Maintenance Levels for Priority Roads

The Greenwater area provides a wealth of recreation opportunities. One such opportunity is the hike to Noble Knob. Noble Knob is a rare gem in that three trails lead to Noble Knob and provide access to incredible views of Mt. Rainier and the surrounding area with very little elevation gain (200 ft from Corral Pass Trailhead and 500ft from Dalles Ridge Trailhead), making these trails family-friendly and accessible for a variety of trail users.

Noble Knob is also one of Washington Trails Association’s Top 100 most trip reported hikes. As we urged in our scoping letter, our organizations believe that high use recreation sites should have an increase in maintenance – meeting all three stated project needs. Moving one of the roads accessing Noble Knob to a Maintenance Level 3 road would enable better access for people who drive passenger vehicles and can help reduce erosion and sedimentation that lesser maintained roads may bring. In addition, Maintenance Level 2 roads are not eligible for Emergency Relief for Federally Owned Road funding, which means that access to Noble Knob may cease to exist in the future if every access road to one of the most popular trails in the Greenwater area is reduced or kept at a Maintenance Level 2 road.

It would be unacceptable to lose access to such a popular trail and destination on the Mt. Baker-Snoqualmie National Forest: **please consider changing the maintenance level of one of the three access routes to Noble Knob from a Maintenance Level 2 to Level 3.** This change would fall in line with other extremely popular trails in the Greenwater area, including the roads to Kelly Butte Lookout and Government Meadows/Pacific Crest Trail.

IX. 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:

Mt. Baker Snoqualmie National Forest INFRA Road Database (2012)			
ID	SEG LENGTH	OPER MAINT LEVEL	OBJECTIVE MAINT LEVEL
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
	31.859		

Appendix B:

Comparison of Decommissioned Roads in Cons/Rec Alternative with Other Action Alternatives									
ID	NAME	BMP	EMP	SEG LENGTH	OPER MAINT LEVEL	OBJ MAINT LEVEL	ALT 2 DECOM	Consv/Rec ALT DECOM	ALT 3 DECOM
7000115	HUC	0	0.5	0.5	2	2	0.5	0.5	
7000118	HUC	0.083	0.28	0.197	2	2	0.197	0.197	0.197
7000119	HUC	0.19	0.27	0.08	2	2		0.08	0.08
7000255	HUC	0	0.25	0.25	2	2	0.25	0.25	0.25
7000260	NACHES TRAIL ACCESS	0.18	0.39	0.21	2	D		0.21	
7000265	HUC	0	0.08	0.08	2	2		0.08	
7000510	HUC	0	0.1	0.1	2	2	0.1	0.1	0.1
7000610	HUC	0	0.1	0.1	2	2	0.1	0.1	0.1
7010210		0	0.6	0.6	1	D		0.6	
7010320		0.08	0.1	0.02	1	D		0.02	
7010350		0	0.08	0.08	2	D		0.08	
7012000	DIVIDE RIDGE	8	8.31	0.31	3	1	0.31		
7012110		0.31	0.5	0.19	2	D		0.19	
7012210	UPPER SECTION 18	1.16	1.66	0.5	3	D		0.5	
7012260	HUC	0	0.08	0.08	2	2		0.08	0.08
7012360	HUCK MTN BO#2	0	0.2	0.2	1	D		0.2	
7012375	HUC	0	0.35	0.35	2	2	0.35	0.35	0.35
7012375	HUC	0.35	0.72	0.37	2	2	0.37	0.37	0.37
7015000	UPPER FOSS CREEK	1.61	3.3	1.69	3	D		1.69	
7020000	SLIDE WEST	0	0.081	0.081	3	2		0.081	0.081
7020000	SLIDE WEST	2.41	4	1.59	3	2		1.59	1.59
7020050	HUC	0.15	0.32	0.17	2	2		0.17	0.17
7020110		0.234	0.56	0.326	1	1		0.326	0.326
7020210	SLIDE CREEK	0.72	1.5	0.78	3	1		0.78	0.78
7021000	LOWER BURNS	0	0.45	0.45	3	2	0.45	0.45	
7030110	LOWER HIMES CAMP	0.1	0.64	0.54	1	D		0.54	
7030210		0	0.5	0.5	2	D		0.5	
7030250	HUC	0	0.27	0.27	2	2		0.27	0.27
7030310	HUC	1.524	1.73	0.206	2	2		0.206	0.206
7030310	HUC	1.73	2.6	0.87	2	2		0.87	0.87
7030312	HUC	0	0.2	0.2	2	2		0.2	0.2
7032110	BURN WEST	0	0.29	0.29	3	2	0.29	0.29	0.29
7032110	BURN WEST	0.29	1.2	0.91	3	2		0.91	0.91
7032211	HUC	0	0.34	0.34	2	2	0.34	0.34	0.34
7035000	SAWMILL RIDGE SPUR	0.582	1.17	0.588	3	2	0.588		
7035210		0	0.98	0.98	3	2	0.98		
7038110		0	0.25	0.25	3	2	0.25		
7060410	HUC	0	0.22	0.22	2	2	0.22	0.22	0.22

7065210	SPUR	0	0.2	0.2	3	D		0.2	0.2
7080350	HUC	0	0.05	0.05	2	2	0.05	0.05	0.05
7080350	HUC	0.05	0.3	0.25	2	2	0.25	0.25	0.25
7080450	HUC	0	0.16	0.16	2	2	0.16	0.16	0.16
7140000	OLD TWIN CAMP	0	0.6	0.6	1	D		0.6	
7146000	EIGHTEEN 31	0	0.7	0.7	1	D		0.7	0.7
7150210	MINNEHAHA	0	0.4	0.4	2	D		0.4	
7174510	CORRAL PASS TRAILHEAD SPUR	0	0.01	0.01	3	3	0.01	0.01	
7190310	CRYSTAL MTN INFO	0	0.3	0.3	2	3	0.3	0.3	
7190610	CRYSTAL MTN SPUR	0	0.028	0.028	2	2	0.028	0.028	
7190610	CRYSTAL MTN SPUR	0.028	0.2	0.172	2	2	0.172	0.172	
7200105*	COFFEE CREEK	0.4	0.46	0.06	2	D		0.06	0.06
7200105*	COFFEE CREEK	0.46	0.8	0.34				0.34	0.34
7200138		0	0.1	0.1	2	D		0.1	
7200142	WENTIATE	0	0.9	0.9	2	D		0.9	
7200151		0	0.5	0.5	2	D		0.5	
7200214	HUC	0	0.06	0.06	2	2	0.06	0.06	0.06
7200219	MILLIE CREEK	0.5	1.1	0.6	2	D		0.6	
7200220*	WYTKO ROAD	0	0.1	0.1			0.1	0.1	0.1
7200223		0	0.28	0.28	3	D		0.28	
7200223		0.28	0.5	0.22	2	D		0.22	0.22
7200223		0.5	0.76	0.26	2	D		0.26	0.26
7200410	HUC	0	0.8	0.8	2	2	0.8	0.8	0.8
7200420	HUC	0	0.4	0.4	2	2	0.4	0.4	
7200421	HUC	0	0.14	0.14	2	2	0.14	0.14	
7220000	ECHO LAKE	1.06	1.32	0.26	2	D		0.26	
7220000	ECHO LAKE	1.32	6.49	5.17	2	D		5.17	
7220000	ECHO LAKE	6.49	6.8	0.31	2	D	0.31	0.31	
7220000	ECHO LAKE	6.8	7.29	0.49	2	D	0.49	0.49	0.49
7220000	ECHO LAKE	7.29	8.756	1.466	2	D	1.466	1.466	1.466
7220110	OSBORN CREEK	0.2	1.3	1.1	2	D		1.1	
7220310		0	0.2	0.2	2	D		0.2	
7220324	MEEKER LAKES	0	1.02	1.02	2	D		1.02	
7222000	FOREST LAKE	3.6	3.74	0.14	3	D		0.14	
7222000	FOREST LAKE	3.74	4.8	1.06	3	D		1.06	
7222000	FOREST LAKE	4.8	6.833	2.033	3	D		2.033	
7222210	FOREST SPRING	1	1.2	0.2	2	D		0.2	
7222211	HUC	0	0.58	0.58	2	2		0.58	0.58
7222230	FOREST MEADOW	0	0.3	0.3	2	D		0.3	
7222310	FOREST MEADOW	0	0.3	0.3	2	D		0.3	
7222510	FOREST RIDGE	0	0.7	0.7	2	D		0.7	
7224240		0	0.2	0.2	2	D		0.2	
7224250		0	0.2	0.2	2	D		0.2	
7226110	LITTLE GEORGE SPUR	0	0.5	0.5	2	D		0.5	

7250110	DALLES RIDGE SPUR	0.6	1.2	0.6	2	D		0.6	0.6
7250112		0	0.3	0.3	2	D		0.3	
7251610*		0	0.13	0.13			0.13	0.13	0.13
7265212	HUC	0	0.05	0.05	2	2		0.05	0.05
7270000	HUC	0	1.13	1.13	2	2	1.13	1.13	
7270110	HUC	0	0.18	0.18	2	2	0.18	0.18	0.18
7270210	HUC	0	0.4	0.4	2	2	0.4	0.4	0.4
7270211	HUC	0	0.12	0.12	2	2	0.12	0.12	0.12
7290000	DALLAS BURN OVERLOOK	0	1	1	2	D		1	
7290000	DALLAS BURN OVERLOOK	1	2	1	2	D		1	
TOTALS:							11.991	42.109	14.996

**These roads were not listed in the 2012 INFRA database, but were part of the Greenwater ATM EA Appendix B*