



January 11, 2018

Joe Neal, District Ranger
 Skykomish Ranger District
 74920 East Stevens Pass Highway
 Skykomish, WA 98288

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

RE: Skykomish Ranger District Emergency Road Repairs

Dear District Ranger Neal,

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

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

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

Specifically, we would like to applaud the Skykomish Ranger District, which has been at the forefront with their work to move towards a more sustainable road system. Despite not being selected for a watershed access travel management plan, the Skykomish District took the initiative in 2012 to sign a decision notice for the South Fork Skykomish roads project

and staff have been working since then to reduce risks from roads in the South Fork Skykomish and Miller-Foss watersheds. We recognize that roads require ongoing maintenance and investment while winter storms can quickly wash-out culverts and roads, eliminating access to campsites, trailheads, and fishing and kayaking locations. We encourage ongoing planning and implementation to protect natural resources, ensure tribal and recreational access and align budgets, as feasible.

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

The roads included in this proposal provide drive-in access to popular family destinations, as well as incredible hiking, equestrian, cross-country skiing, snowshoeing and climbing trails in the Wild Sky and Henry M. Jackson Wilderness Areas. The proposed projects will restore and/or improve access to 14 trails and 5 campgrounds.

Furthermore, the proposed road repair projects, and the access they will provide, will help sustain the local economies that benefit from outdoor recreation in the area. Outdoor recreation is a major economic driver in Washington generating \$26.2 billion in annual consumer spending, supporting 201,000 jobs and supplying \$2.3 billion in state and local tax revenue.¹ The steady flow of visitors is critical to the economies of small towns in the Skykomish Valley. Visitors stop to spend money on meals; buy groceries; purchase gear; sign up for paddling, horseback riding, backpacking or other recreational trips; and stay overnight at hotels and vacation rentals in towns Sky Valley communities.

None of these road segments were identified as “unnecessary” as part of the recent Sustainable Roads Analysis by the Mt. Baker-Snoqualmie National Forest. We request that the repairs and overdue maintenance on these road segments reduce or remove identified risks to aquatics and wildlife and potential for loss of access from future road-washouts. We ask that the final decision to detail measures taken that will reduce these risks..

We support the following road repair projects that provide important recreational or tribal access outlined in the scoping letter.

Beckler Peak Road NFS Road 6066, MP 5.89 - The Forest’s SRS analysis identified this road as a “medium” need for recreation providing access to the Jennifer Dunn Trailhead and the Beckler Peak Trail and the Alpine Baldy Trail for hiking and mountain biking opportunities. The Forest’s SRS analysis also indicated this road as “medium” risk for aquatics.

Index Road, NFS Road 6300, MP 16.6, 17.2, 18.1, 18.3 & 18.8 – The Forest’s SRS analysis identified these road segments as a “high” need for recreation providing access to the Quartz Creek, North Fork Skykomish, West Cady Ridge, Blanca Lake, Bald Eagle Mountain, Pass Creek and the Pacific Crest Trail providing access for hiking, equestrian, fishing and camping opportunities. In addition this road provides access to kayaking opportunities on the North Fork Skykomish. The Forest’s SRS analysis also indicated this road as “high” risk for aquatics.

Beckler River Road, NFS Road 6500, MP .15, 2.5 & 4.08 – The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to the Johnson Ridge, Meadow Creek Trails, the Evergreen Mountain Lookout and the Beckler River Campground for hiking, equestrian, camping and overnight rental opportunities. The Forest’s SRS analysis also indicated this road as “medium” risk for aquatics.

East Fork Miller River Road, NFS Road 6412, MP 1.79 – 4.59 – The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to the Dorothy Lake Trail for hiking opportunities. The road also provides access to whitewater paddling on the East Fork Miller River. The Forest’s SRS analysis also indicated this road as “medium” risk for aquatics and “high” risk for wildlife.

Tonga Ridge Road, NFS Road 6830, MP 5.95 – The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to the Tonga Ridge Trail for hiking, cross-country skiing, berry gathering, snowshoeing and camping opportunities. The Forest’s SRS analysis also indicated this road as “high” risk for aquatics.

¹ Outdoor Industry Association. 2017. <https://outdoorindustry.org/state/washington/>

West Fork Foss River Road, NFS Road 6835, MP 1.4 – The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to Foss Lakes Trail for hiking, cross-country skiing and snowshoeing opportunities. The Forest’s SRS analysis also indicated this road as “low” risk for aquatics.

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

We stress that most of these roads are rated as medium or high risk to aquatics. This is largely due to their location next to rivers or within riparian areas. These areas are important for aquatic species such as Chinook salmon, bull trout and steelhead and they also provide a wealth of outdoor recreation opportunities. This project provides an opportunity to complete repairs and maintenance in a manner that protects aquatic species, wildlife and clean water while also ensuring recreational access. It is our understanding that Federal Highways, which provides funding for this type of work, generally only replaces “as is.” We encourage the agency to view this as an opportunity to repair the road to current standards according to the Forest Service and State of Washington (e.g., appropriately-sized culverts, create adequate road drainage, diffuse water across the landscape and install appropriate features to “stormproof” these roads) ensuring that impacts to rivers and fish are minimized moving forward. We are pleased to see that at least on Beckler Creek Road (FSR 6066) at milepost 16.6 and 17.2, the old culverts which caused the road closures will be replaced with new structures which should not only improve passage for aquatic species but also reduce the risk of another road wash-out. Additional actions are likely needed to reduce or remove moderate or high risks to wildlife.

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

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

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

Sincerely,

Tom Uniack
Executive Director
Washington Wild
tom@wawild.org

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

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

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

Hilary Eisen

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

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

John McGlenn
President
Washington Wildlife Federation
johnmcglenn@gmail.com

Debbie Cople
Director
Sky Valley Chamber of Commerce & Visitor Info Center
debbie@skyvalleyvic.net

Kitty Craig
Washington State Deputy Director

The Wilderness Society

kitty_craig@twc.org

Don Parks

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

Blair Corson

Owner
Outdoor Adventures
blair@outdooradventurecenter.com

Yvonne Kraus

Executive Director
Evergreen Mountain Bike Alliance
yvonne@evergreenmtb.org

Wendy McDermott

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

Joe Sambataro

NW Regional Director
Access Fund
joe@accessfund.org

Thomas O'Keefe, PhD

Pacific Northwest Stewardship Director
American Whitewater
okeefe@americanwhitewater.org

Michael Davis

President
Mount Baker Club
mikesdavis@outlook.com

Katherine Johnson

Forest Practices Chair
Pilchuck Audubon Society
katherine@earthlink.net

Eddie Espinosa

NW Policy Advisor

American Alpine Club
eddie.espinosa@gmail.com

Rich Simms

Founder/Board Member
Wild Steelhead Coalition
info@wildsteelheadcoalition.org

Dave Werntz

Science & Conservation Director
Conservation Northwest
dwerntz@conservationnw.org

Henry Sladek

President
Skykomish Chamber of Commerce
hsladek@msn.com

Tom Hammond

President
North Cascades Conservation Council
tphammond@gmail.com

Chase Gunnell

Conservation Chair
WA Chapter of Backcountry Hunters and Anglers
chasegunnell@gmail.com

Ann Darlington

President
Friends of Heybrook Risidge
anndarlington320@gmail.com

Karl Forsgaard

President
Alpine Lakes Protection Society
karlforsgaard@comcast.net

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