

February 17, 2011

Joseph R. Neal, District Ranger  
Skykomish Ranger District  
74920 NE Stevens Pass Highway  
Skykomish, WA 98288-0305

**RE: 1950-01 Comment period on Harlan Creek Road Decommissioning Project**

Dear Ranger Neal:

On behalf of the groups signed below, welcome to the Skykomish Ranger District! We recognize this district as a recreational and ecological gem and have collectively worked for many years to study, comment on, and occasionally to help implement Forest Service projects on the District. Most of us also helped to promote the Wild Sky Wilderness and are interested in seeing the new Wilderness protected and restored to the greatest extent possible.

We therefore appreciate the Forest Service's proactive approach to deal with the problem of off-road vehicle (ORV) trespass into the Wilderness. Motorbikes, quads, jeeps, and snowmobiles all can easily access the Wilderness using the present road system.

We also recognize that in addition to mitigating wilderness trespass, decommissioning the targeted roads is also important to avoiding current and future ecological impacts that may result from the inability to adequately maintain this road system. Blocked culverts, sedimentation, and other impacts are real concerns in this area, now and in the future.

Decommissioning these roads is also a strong step toward "right-sizing" the road system on the Mount Baker-Snoqualmie National Forest. An oversized system of roads in Washington's National Forests—combined with prolonged underfunding of road maintenance and reclamation—has created a \$300 million backlog of work. This is part of a national backlog that is now estimated to cost more than \$10 billion, and the price tag is increasing each day. On November 10, 2010, the Chief of the Forest Service issued a memo requiring each National Forest to "right-size" its road system by 2015 to combat this maintenance backlog.

Many of our organizations are members of the Washington Watershed Restoration Initiative (WWRI), which has worked to successfully advocate for \$180 million of new federal funding over the past three years, under the Legacy Roads and Trails Remediation Initiative, to help deal with the existing maintenance backlog for Forest Service Roads. It is our understanding that part of the funding for this project will be from Legacy Road funding.

We applaud the Forest Service for taking the initiative with this project and would like to provide the following scoping comments to help ensure that the proposal successfully achieves the goals discussed above.

## **Support for Alternative 2**

We support Alternative 2 because it is the most comprehensive of the decommissioning options. However, we also support additional road decommissioning within the 6522, 6524 and 6525 road systems which are either identified in Alternative 2 or outside the project area. We hope that as additional funds and capacity becomes available, these roads will be considered for decommissioning as well.

Alternative 2 ensures that roads on some of the steepest headwall slopes in the drainage (end of 6525-000 and -810) would be removed and original hydrological conditions restored. The 11.2 miles of roads targeted for decommissioning in Alternative 2 provide no access to any trails, and no access to recreational facilities or attractions. These roads have a history of not being maintained adequately. The maintenance that has occurred, and that would be needed in the future, diverts scarce taxpayers' dollars away from maintenance of other roads which do provide access to trails and other recreational facilities.

In order to ensure that damage done by ORVs can be restored prior to the roads being put to bed, the road decommissioning should be scheduled or staged in an appropriate way. Such an approach should allow Forest Service and/or Tribal work crews to achieve any restoration that is needed without the need for future motorized or road access to the area. Please be sure to announce any such projects (especially within the wilderness) for public review under NEPA.

Long-term access to the Wilderness by Tribal members as well as the general public will be augmented by the planned Alpine Baldy trail system, which should provide excellent access to the Alpine Baldy-Beckler Peak ridge system. From the new trail, hikers who reach the ridge can readily find their way to various meadows and lakes that currently can be reached from the Road 6525 system.

## **Off-Road Vehicles**

ORVs can create significant environmental impacts. As a result, the Forest Service has identified unmanaged ORVs as one of the top four threats to the National Forest System and has implemented the OHV Planning Rule, which eliminated the “open unless closed” mentality that had been common on much of the National Forest System. As of 2009, the rule required all forests to have an OHV travel map that indicated all designated OHV routes.

When ORVs leave legally designated routes, they carve new unauthorized routes through sensitive habitats, erode and compact soils, degrade habitat and water quality, and spread invasive weeds. Many species of wildlife are affected by the noise as well as the sight and smell of ORVs, and will leave an area where ORV use is occurring. Erosion caused by ORV use can fill streams with sediment, choking out popular fish species such as salmon, steelhead and trout, and harming aquatic plants. In winter, unrestricted snowmobile use can disrupt native wildlife and non-motorized recreationists. With a typical winter snowpack, snowmobiles can easily ride over many obstacles, including gates.

We urge that the Forest Service take measures to prevent both summer and winter off-road vehicle use of the Harlan Creek road system. ORVs travel many miles easily and rapidly. The road-induced ORV problems of Wilderness trespass, sedimentation from road degradation, and other impacts can be fully addressed only by additional enforcement measures above and beyond road decommissioning.

We believe that reliance on a gate to exclude off-road vehicles (ORVs), as proposed in the preferred alternative 1 at the junction of the 6525-410 spur, would be ineffective. Gates work most effectively where patrols are frequent and where bypass routes can be quickly and effectively closed off. Neither condition applies here. We know of no instance where a gate in a remote place like this has successfully kept out ORVs. Instead, a series of berms—as many as possible and as steep as possible—is the only method of excluding ORVs that has any chance of success. Twenty years of experience with ORV exclusion by the Washington State Department of Natural Resources in the Middle Fork Snoqualmie valley has shown that berms work far better than gates, and that only a series of berms is effective at keeping machines out.

The entirety of Road 6525 within the project area should be administered as a closed road and fitted with a gate and signage at an appropriate choke point near the northern project area boundary. Please also put in place measures to block winter snowmobile access to the road system as well. For example, piling large down logs and rootwads at the beginning of decommissioned roads will reduce the ability of snowmobiles to gain access to the old roadbeds.

We are concerned that leaving Road 6525-000 open all the way up to and including spur -810, as proposed in Alternative 1, would invite snowmobiles to use that road system in the winter and provides ready access to the Wilderness.

### **Environmental Benefits**

Please disclose the benefits to the environment of the action alternatives, such as reduced road density, improved water quality, lower risk of slope failure, increased quiet in the Wilderness and elsewhere, benefits to wildlife, reduced risk of fire starts, and so on.

### **Invasive Weeds**

This project should require that surveys for invasive, non-native weeds be carried out before any ground disturbance occurs, and that measures be taken to avoid disturbing patches of weeds. We are concerned that there are ongoing infestations of Japanese knotweed in the lowermost parts of the Beckler valley (mostly on private land), and that equipment could transport knotweed seeds or rhizomes into units of this project. Knotweed is exceptionally difficult and expensive to eliminate.

### **Elimination of EA Public Comment Period**

It is our understanding that the Forest Service is not anticipating an additional public comment period for the draft environmental assessment. This is an uncommon approach and means that

the current scoping comment period would be the only opportunity for the public to weigh in on this issue. It is more common to eliminate the scoping comment period rather than the draft EA comment period. We are concerned that this approach may deprive some interested members of the public from commenting or from having administrative or legal opportunities for appeal.

We look forward to seeing your final environmental assessment and decision. Please keep the undersigned on the mailing list for this project.

Yours sincerely,

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