

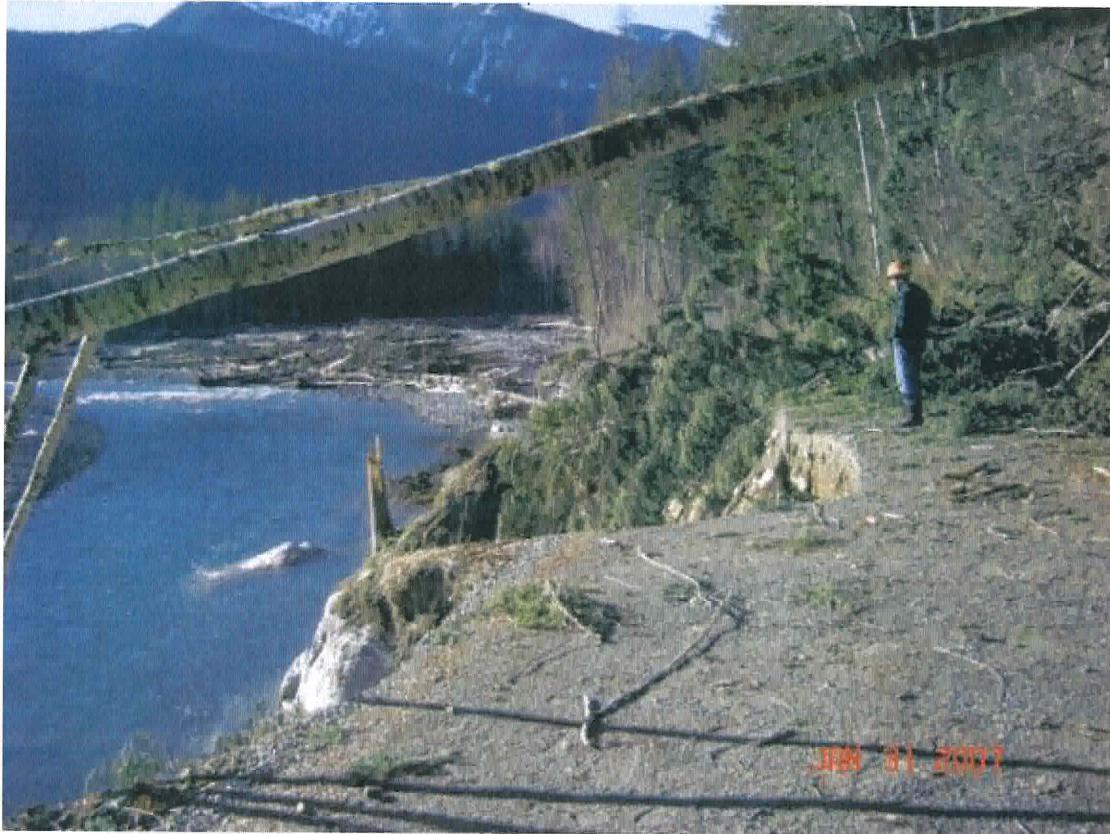
**U.S. Department of Transportation
Federal Highway Administration**

**Western Federal Lands Highway Division
Vancouver, Washington**



**Suiattle River Road Project
WA FS ERFO 071-2023
Finding of No Significant Impact**

November 2012



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**Suiattle River Road Project
Snohomish County, WA
Decision Document and Finding of No Significant Impact**

WA FS ERFO 071-2023

Submitted
Pursuant to Public Law 91-190
National Environmental Policy Act
42 USC 4332(2)(c)

U.S. Department of Transportation
Federal Highway Administration
Western Federal Lands Highway Division

Cooperating Agency
U.S. Department of Agriculture Forest Service
Mount Baker-Snoqualmie National Forest

November 8, 2012

Date Approved

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November 2012

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BACKGROUND

Forest Service Road 26 (also known as the Suiattle River Road), is part of a high-use, multi-season administrative and recreation route on the Darrington Ranger District of the Mount Baker-Snoqualmie (MBS) National Forest. The first 10 miles of Suiattle Road 26 are a paved double-lane road; the last 13 miles are a single lane, gravel-surface road with turn-outs. Road 26 provides vehicular access to state and private lands, tribal allotments, two Sauk-Suiattle tribal cemeteries, and national forest lands within the Suiattle River drainage.

The Suiattle Road 26 is a forest management road and major recreational portal to the Glacier Peak Wilderness and the Pacific Crest National Scenic Trail. Suiattle Road 26 also provides roaded access to the Green Mountain Trailhead, where hikers venture into high alpine meadows with spectacular vistas.

Two popular concession operated campgrounds are accessed by Suiattle Road 26 as well as a Forest Service rental cabin just beyond the Buck Creek Campground. Commercial outfitter guides use Suiattle Road 26 to provide rafting adventures on the Suiattle River, and Road 26 is used by the public for river access for their boats, rafts, and kayaks. Road 26 provides driving access for pleasure and scenery, access for hunting, fishing, gathering wild mushrooms and berries as well as other forest products. During the winter, the Suiattle Road provides low-elevation access for skiing, snowmobiling, and snow play. Local tribal representatives have also identified areas within the Suiattle River drainage that are important for traditional use with motorized access greatly enhancing access by tribal elders and youth (United States Forest Service (USFS) records).

Due to the high recreational use, the MBS Forest-wide Roads Analysis (United States Department of Agriculture (USDA) USFS 2003) and the recent Suiattle Access and Travel Decision Notice and Finding of No Significant Impact (USDA Forest Service 2012) have identified the Suiattle Road 26 as a **High Need** road for recreation. The current operational maintenance level is for road conditions useable by all vehicle types with moderate comfort and convenience.

Note: There were two environmental assessments involving Road 26 in the Suiattle River drainage proceeding in 2012. The Mt. Baker-Snoqualmie National Forest was finalizing an Environmental Assessment (EA) on the road management in the Suiattle River drainage (Suiattle Access and Travel Management [ATM] EA) and Federal Highway Administration (FHWA) was preparing an EA on repair options for eight flood damaged sites on Road 26. The Forest ATM EA analyzed options on what roads would be retained in the forest road system as open for recreation and administrative use, and what roads would be closed or decommissioned within the Suiattle River drainage.

The Suiattle ATM Decision Notice and Finding of No Significant Impact (DN and FONSI) was signed in February 2012; this decision retained Road 26 for passenger vehicles to the terminus. There was one appeal of the Suiattle ATM EA DN and FONSI, which was reviewed by the Appeal Reviewing Officer (Regional Office of Region 6 of the USDA Forest Service in Portland, OR). The Darrington District Ranger's decision documented in the Suiattle ATM DN/FONSI was affirmed in a letter dated April 18, 2012. The Forest Service is currently implementing their road management in the Suiattle River drainage with the decision made in the 2012 Suiattle ATM DN and FONSI.

A history of the Road 26 is provided in Appendix A of the Suiattle River Road Environmental Amended Environmental Assessment (A-EA) and is on the Mt. Baker-Snoqualmie Forest website at <http://www.fs.usda.gov/detail/mbs/landmanagement/projects/?cid=stelprdb5298299>.

The fiscal year 2004 to fiscal year 2007 floods caused damage to Suiattle Road 26 at eight different sites. Portions were partially or completely washed out by the Suiattle River making the road impassable to motorized vehicle traffic. There is a need for safe motorized vehicle access for administrative, recreational and tribal cultural use within the Suiattle River drainage. The access requires managing the transportation system at the minimum standard needed to support planned uses and activities while providing for public safety (Forest Plan p. 4-7). The road in its current damaged condition limits access in case of forest fire, does not provide vehicle access to traditional recreational areas, and limits access for traditional tribal cultural events.

DECISION AND SELECTED ALTERNATIVE

FHWA is the lead agency for National Environmental Policy Act (NEPA) compliance for this road repair project. After reviewing the *Suiattle River Road Project, WA FS Emergency Relief for Federally Owned Roads (ERFO) 071-2023, Environmental Assessment* (FHWA, March 2012) (EA) and the *Amended Environmental Assessment* (FHWA, August 2012) (A-EA), the specialists' reports, applicable Federal Highway Administration and Forest Plan direction, and tribal and public comments for the proposed Suiattle Road 26 repairs, the Western Federal Lands Highway Division (WFLHD) of the FHWA has selected Alternative B in the EA and A-EA as the best alternative to meet the purpose and need for the project. Alternative B will be referred to as the Selected Alternative in this document.

FHWA has determined that the Selected Alternative for the repairs of the eight flood damaged sites on the Suiattle River Road (Road 26) will have no significant impact on the human environment. This conclusion is based on the analysis contained in the EA and the A-EA, as more fully summarized below.

The Selected Alternative will involve the following work at the eight flood damaged sites:

- **Site #1, Milepost 6.0 (T33N, R10E, Section 18).** The selected action will repair the Suiattle Road 26 at Site #1 by rerouting the road approximately 400 feet to the north of the eroded river bank of the Suiattle River, which would be outside of the channel migration zone. The total length of the realigned road would be approximately 2150 feet through previously harvested State lands, managed by the Department of Natural Resources. The roadway will be double-lane, paved with asphalt to the width of adjoining segments of Road 26.
- The existing and temporary road replaced by the realignment (approximately 1850 feet) will be obliterated and revegetated. This will include the removal of asphalt, scarification of the road bed, replanting of portions of the roadbed, and placement of large woody debris at entry points to discourage motorized use of the abandoned road. Additionally wetland restoration would remove portions of the existing roadway embankment to reconnect existing wetlands and maintain existing flow patterns.
- **Site #2, Milepost 12.6 (T32N, R11E, Section 9).** The Suiattle River moved into the hillside at Site #2 and washed out about 800 feet of roadway. The selected action will reconstruct the road for approximately 950 feet above the washout, with an offset of approximately 50 to 70 feet from the existing road. This realignment will remove approximately 1.2 acres of mature

forest. Blasting will be required to excavate rock at the MP 12.6 site; gneiss bedrock is anticipated to be present in cut slopes from approximately MP 12.6 to MP 12.8. The proposed roadway width is 14 feet plus curve widening and turnouts.

- The existing roadway replaced by the realignment will be obliterated. Conserved topsoil, seed and mulch will be stockpiled to be used in the rehabilitation of the obliterated section of road.
- **Site #3, Milepost 13 (T32N, R11E, Section 9) and Site #4, Milepost 13.4 (T32N, R11E, Section 10).** A reroute of Road 26 will bypass both damaged sites #3 and #4. The approximate 1.1 mile reroute will use Forest Service Road 2670 for the first 0.5 mile and then new road construction through second growth and mature forest to reconnect to Road 26. The new road alignment will leave Road 26 at MP 12.7, before washout Site #3 and re-enters Road 26 at MP 13.8, on the east side of damaged Site #4. The realignment will locate the road farther from the Suiattle River and outside of wetlands, crossing a forested terrace. The reroute will result in ground disturbance on approximately 6 acres which would include approximately 2.0 to 3.0 acres of mature, older forests. The 6 acres disturbance is an estimate based on tightening design elements in response to comments of reducing road width impacts. The 2010 design for this segment of road has been narrowed in some locations, and the amount of timber clearing required has been reduced, by eliminating proposed roadside ditches in some locations, and by steepening the cut slope on some of the shorter cut banks. Felled trees will be decked and used for administrative projects such as improved fish habitat, repairs, or to sell. The proposed roadway width is approximately 14 feet plus curve widening and turnouts. The roadway will be crushed aggregate surfacing.
- The section of Road 26 with damage Site #3 and #4 will be abandoned and rehabilitated. This would include removal of culverts, revegetation of portions of the route, placement of large woody debris at entry points to discourage motorized use of the abandoned road, and reconnection of wetlands to the Suiattle River floodplain. Additional details on the wetland restoration can be found in the hydrology section of Chapter 3 in the EA and the A-EA.
- **Site #5 MP 14.4 (T32N, R11E, Section 11).** The new road will be located in a reroute section upslope, approximately 60 to 125 feet farther from the Suiattle River and outside of the banks of the Wild and Scenic River. The 400 foot temporary road along the river will be removed. The road repair at MP 14.4 will be configured to retain access to the existing parking area and the existing Huckleberry trailhead. A reconfiguration of the Huckleberry trail was completed in fall of 2011 to connect with the new road alignment.
- The removal of the temporary bypass will require excavation with hauling and disposal of an estimated 1,500 cubic yards of material and replacement of the existing 24-inch diameter culvert with a larger culvert (100-year flood capacity) in the non fish-bearing stream. Excess excavated materials will be hauled off site. Work will occur outside of the banks of the Suiattle Wild and Scenic River.
- The relocation route will be about 600 to 900 feet long and will require excavation and fill to grade level with approximately 3,000 cubic yards of unclassified borrow and material taken from the cut sections and former bypass. This relocation route will follow the location previously cleared of timber in 2006 and 2010. Approximately 1.5 acres of timber clearing was performed in 2010, which included some previously cut timber lying on the ground from

the terminated 2006 road project. Most of the timber felled in 2006 and 2010 that is remaining on-site would be removed during the road construction. Three of the largest Douglas-fir trees would be left outside the clearing limits to meet down wood guidelines of the MBS Forest-wide Programmatic Wildlife Biological Assessment and Biological Opinion. Excess trees will be decked and used for administrative projects such as improved fish habitat, repairs, or to sell. The abandoned portion of the road bed replaced by the realignment will be obliterated and revegetated.

- **Site #6, Milepost 20.8 (T32N, R12E, Section 14).** The road would be reconstructed to 16 feet by widening the roadway slightly into the hillside. For the proposed repair, the additional cut would be an estimated 8 feet into the hill through the narrowest section of roadway, with a 1h:1v backslope. The expected cut height would be part of the final design, with a current estimate of a cut of 40 feet at the highest section. The cut height would taper up to this point for about 100 feet before, and 150 feet after the peak, so it would be about 250 feet long altogether. Note there are several design details that would be determined with the final design stage. This would include the final vertical alignment and specific road drainage details.
- **Site #7 MP 20.9 Downey Creek Bridge (T32N, R12E, Section 14).** The proposed Downey Creek Bridge repair will utilize the existing 115 foot long cast-in-place box girder bridge to cross the main channel of Downey Creek, but will add a 210-foot bridge extension at the west end. This new design will reduce the channel constriction presented by the existing bridge by removing the west approach embankment that is on the flood plain. The new design was developed with input from the Sauk-Suiattle and Upper Skagit Indian Tribes, Washington Department of Fish and Wildlife biologists, National Marine Fisheries Service and Fish and Wildlife Service Biologists, and the public. The bridge extension would be partially funded through a Salmon Recovery Board grant developed in partnership with the Skagit River System Cooperative and the US Forest Service.
- In order to extend the existing bridge to the west, three spans of approximately 70 feet each will be constructed, creating a 210 foot bridge extension to completely cross the flood plain. As these spans are built, the existing embankment (approximately 3500 cubic yards) and the existing 48" culvert will be removed, and riprap (approximately 200 cubic yards) will be placed outside of the flood plain to armor the existing overflow channel and protect the new bridge pier. All the new spans will be supported by piers founded on piles or spread footings that are deep enough to resist scour. The bridge extension will be single lane, matching the existing bridge. The additional 210 feet of bridge length will provide for additional stream channel width to better accommodate flood flows and allow for natural channel processes to occur across the width of the flood plain. The area under the Downey Creek Bridge extension will be left with the native material on the surface.
- **Site #8 MP 22.9 Sulphur Creek Bridge (T32N, R12E, Section 24):** A concrete faced retaining wall will be built at the edge of the Sulphur Creek Bridge deck and keyed to the bank. Existing on-site material will be used for the retaining wall backfill. This will include excavating existing material, placing a portion of it as backfill. Up to 100 cubic yards of riprap will be installed to protect the concrete wing walls. This design will enlarge the area for the channel under the bridge by another 15 feet for a total width of about 65 feet

(estimated bankfull channel width is 64 feet). All fill removal will occur outside of the current wetted channel. The damaged railing will be repaired or replaced.

This decision also includes the implementation of the management requirements and mitigation measures listed in Appendix A.

OTHER ALTERNATIVES CONSIDERED

Two other alternatives, besides the Selected Alternative were carried into detailed analysis in the EA and A-EA:

Alternative A - No Action

The No Action Alternative would have resulted in no repairs to any of the eight flood-damaged sites at this time. Road 26 would be retained on the USFS road system to be maintained for passenger car as per the USFS 2012 Suiattle ATM DN and FONSI and as funding permits, these roads would be repaired or continue to receive minimal maintenance on sections of road open to administrative use. I did not select this alternative since it did not meet the purpose to restore safe motorized access within the Suiattle River drainage for administrative, recreational and tribal cultural uses.

This alternative also does not address the issues of risk or future repairs to recreational access or other resources. With no action, limited road maintenance would continue on portions of Road 26 open to administrative traffic (from MP 12.6 to MP 20.9), until temporary access is lost to encroaching river flows or other events. There is a high-risk that Road 26 will wash out at Site #2 (MP 12.6). Once equipment access is lost at Site #2, there would be no road maintenance on the 17.8 miles of road beyond Site #2. Over time, the lack of access for road maintenance activities would contribute to other failure types along this segment of road, such as ditch and culvert failures, downed trees, and slides. This would contribute additional sediment to side channels with potential impacts to fish habitat and water quality (A-EA, page 109). With the No Action Alternative, there would be no removal of fill in the flood plain at Downey Creek or widening of the opening under Sulphur Creek Bridge, and therefore no enhancement of Riparian Reserve conditions or fish habitat.

This alternative would have limited tribal, private, and public access to individuals able to traverse the Suiattle River drainage by foot, bicycle or stock. There would continue to be a total loss of access to certain areas for individuals with mobility challenges. This alternative would not be consistent with the MBS Forest Plan, the MBS Forest Roads Analysis, and the USFS 2012 ATM DN and FONSI.

Alternative C - Repair Road 26 at MP 6.0 to 14.4 and close Road 26 at the junction with Road 2680.

Alternative C would have restored vehicle access with repairs to flood-damaged sites as far as the junction of Road 26 with Road 2680. The road past that intersection would have been blocked to vehicle access (the gate from MP 12.6 would be moved to the road junction with 2680). While Alternative C would provide the same benefits to access from road repair at MP 6.0 to MP 14.4 in the Suiattle River drainage as the Selected Alternative, Alternative C would have the same consequences as Alternative A (No Action) from MP 19 to the road terminus at MP 23.2. Alternative C would not provide for the flood plain enhancements at Downey Creek and Sulphur Creek, and would not meet the purpose and need as fully as the Selected Alternative.

I did not select Alternative C since this alternative would not provide the same level of recreational and tribal opportunities as would the Selected Alternative. Closing the road at MP 19 would require longer hikes for those with abilities to reach the vista views, thus decreasing the recreational opportunities for those with more limited time windows. Closing the road at MP 19 also would foreclose opportunities for those who are less mobile to experience this part of the Forest. This is a particular concern for the elderly and tribal members who otherwise may be practically foreclosed from accessing this area. While Alternative C might create the possibility of new recreational opportunities over relatively flat ground for certain members of the disabled community, I conclude that such gain would come at the expense of the loss of access for others in the elderly or disabled community. This is of particular concern given the importance of this area to the tribes. Alternative C also would prevent vehicular access to the Sulphur Creek campground, one of only two vehicle access campgrounds in the Suiattle River drainage. Finally, this alternative would not be consistent with the Forest Plan, the Forest Roads Analysis, nor the USFS 2012 Access and Travel Management Decision Notice and FONSI for the road system in the Suiattle River drainage.

In addition to the selected alternative and the two alternatives considered in detail, five other alternatives were considered but not analyzed further (See Chapter 2 of the EA and A-EA, Section 2.1).

RATIONALE FOR THE DECISION

The Selected Alternative best addresses the project's purpose and need and responds to key issues. FHWA in collaboration with the USFS has developed this alternative with issues raised through the scoping process, considering the concerns of area residents as well as federal, state, local agencies and Indian Tribes. This decision takes into consideration the analysis and evaluation disclosed in the EA and A-EA, including best scientific information, and the manner in which the alternatives met the purpose and need for action and addressed issues and public comments raised during the analysis. This alternative will restore vehicle access with repairs of the flood-damaged sites, and rehabilitate abandoned sections of Road 26.

This alternative best meets the purpose and need identified in the EA and the A-EA by providing access suitable for multiple types of vehicles, including passenger vehicles to the recreational opportunities in the Suiattle River drainage, access to State and private lands, access to the Sauk-Suiattle Indian Tribal cemeteries, and access for Tribes to tribal allotments and traditional gathering and use areas.

The Selected Alternative also best provides an option that balances restoration of desired access while minimizing risk of future wash-out at repair sites and minimizing impacts to aquatic habitat, specifically Chinook spawning habitat. The relocation of Road 26 in the selected alternative also provides for improved floodplain connectivity, maintains the free-flow characteristics of the Skagit Wild and Scenic River system and moves sections of Road 26 out of the channel migration zone. The Selected Alternative recognizes the effects to mature and old growth species, with design alternations to minimize the footprint of the road relocations.

The decision was made with consideration of the responsiveness of the alternatives to the key issues (see below) and comments rose during scoping and in response to EA and the A-EA. The decision considered applicable laws, regulations and policies; tribal treaty rights, tribal and public input, and the effects of the alternatives on physical, biological, social and economic

environments (see Chapter 3 of the A-EA). The Selected Alternative provides the best balance between resource protection and enhancement while providing desired access within safety and cost considerations.

ISSUES ADDRESSED

I reviewed the concerns identified by scoping respondents and input from the interdisciplinary (ID) team members contributing to the project, and I determined whether there were key issues to be addressed based on criteria in the Council on Environmental Quality [CEQ] regulations at 40 CFR 1501.7. Non-issues are identified as those:

1. Outside the scope of the Proposed Action;
2. Already decided by law, regulation, Forest Plan, or other higher level decisions;
3. Irrelevant to the decision to be made; or
4. Conjectural and not supported by scientific or factual evidence.

Issues were used to develop alternatives, identify mitigation measures, or track environmental effects. Issues were identified based on differences in the potential impacts of the alternatives to access and resources. The following issues were identified for this project.

Issue #1 - Road 26 repairs may have adverse effects on the Suiattle River (Wild and Scenic River status) and floodplain processes, with further effects on aquatic integrity, Riparian Reserve conditions, wetlands, water quality, and fish habitat.

The road repairs of the Selected Alternative are not within the Suiattle River; the realignment of the road is away from the river and out of the channel migration zone (Site #1 to Site #5), resulted in the determination that a Section 7(a) Determination is not needed (Wild and Scenic Rivers, as per Forest Service Manual 2354.7 and Forest Service Washington Office amendment 2300-2004-2). The Selected Alternative will protect the free flowing characteristics and water quality of the river and the outstandingly remarkable characteristics of wildlife, fish, and scenic quality (A-EA, Section 3.3).

The Selected Alternative will relocate Road 26 at Sites #1 through #5, moving the road out of the channel migration zone and increased connectivity of wetlands and floodplain. There will be a total of approximately 0.66 acres of wetland impacts that will occur with restoration targeted at MP 6.0 and in the one mile of Road 26 that will be decommissioned from approximately MP 12.7 to MP 13.8.

The Selected Alternative will result in a minimal amount of sedimentation, and will move the road approach fills out of the bankfull channel width under the Site #7 Downey Creek Bridge and the Site #8 Sulphur Creek Bridge (See the A-EA, Chapter 3 Sections 3.7 to 3.10). The Selected Alternative will not change existing trends in Chinook and bull trout populations (federally listed fish) or measurably influence fish populations and is not likely to affect habitat. Sedimentation will be short term and not exceed transport capacity or natural variation. Large woody debris loading, the routing of channel morphology, and the natural hydrology flow in Downey and Sulphur Creeks will be improved, as the area under the bridges will be increased.

Issue #2 - Road 26 repairs may have adverse effects on the old growth resources and wildlife species associated with older forests.

The Selected Alternative would convert about four acres of mature forests that currently do not provide suitable structure for nesting spotted owls or marbled murrelets. The conversion of these acres will not adversely affect the critical habitat unit's ability to contribute to the recovery of spotted owls or marbled murrelets. Changes in wildlife habitat and wildlife populations would be slight due to the small amount of habitat change, and the change occurring in very small areas separated by relatively large distances. No cumulative effects were identified that would result in measurable changes of wildlife or wildlife habitat for the Suiattle River drainage area. There are no significant effects to wildlife beyond a temporary increase in noise; see A-EA Chapter 3, section 3.11 *Effects, Wildlife*, and Chapter 4 – Section 4.1 - Consultation with United States Fish and Wildlife Service (FWS).

Issue #3 - Road 26 repairs may be subject to future flood impacts and therefore not cost effective.

The Selected Alternative will reduce the risk of future washouts by relocating the roadway further away from the river at Site #1 to Site #5 (MP 6.0, and MP 12.6 to 14.4) and pulling back approach fills and installing concrete retaining walls at Downey Creek (Site #7) and Sulphur Creek (Site #8) to protect the road slope and increase the channel width under the bridges (A-EA, Chapter 3). The repair at MP 20.8 would have a moderate risk of future failure due to the lack of riprap at the toe of the slope. However, by widening the road and shifting it into the hill, the risk of future washouts would be decreased from the No Action alternative and the repair design would not disturb fish use of this stream reach created with the shift of the Suiattle River to the south side of the channel (A-EA chapter 3, Sections 3.2.2 and 3.7.2).

Issue #4 - Upper Road 26 repair would diminish non-motorized opportunities for recreationist in the Suiattle River drainage.

The Selected Alternative responds to the high need for this road system to provide a wide variety of recreation and administrative uses on state, private, tribal and national forest lands. The Suiattle Road 26 is a high level, highly used recreation route on the MBS National Forest (A-EA page 1, Chapter 3 Sections 3.1 to 3.6, and 3.15). The selected Alternative will restore access to 7 trailheads, 2 campgrounds, a cabin rental, and access to the river for boating and fishing. The Selected Alternative will restore access to multiple recreational areas, dispersing use while maintaining non-motorized opportunities in the wilderness areas of the Suiattle drainage which comprises 70 percent of the Suiattle River drainage. (See A-EA, Chapter, section 3.4 to 3.6). The Selected Alternative best provides for dispersed recreation and administrative and

emergency use within the Suiattle River drainage while providing access to private land, Sauk-Suiattle Tribal cemeteries, tribal allotments, traditional gathering and cultural use areas of local Tribes.

MITIGATION

Mitigation measures and design features are developed to avoid, reduce, eliminate, rectify, or compensate for the undesirable effects of proposed activities. Implementation of the mitigation measures and design features identified in the A-EA is a condition of my approval of the Selected Alternative. Appendix A lists all project mitigation measures and design features, states their objectives, rates their effectiveness, identifies which the standards and guidelines they address, and identifies the person responsible for their enforcement.

PUBLIC INVOLVEMENT

- **2004 to 2006 scoping:** In 2004, the Forest Service mailed a scoping letter describing initiation of the environmental analysis of repairs to roads across the MBS National Forest that were damaged in 2003. The Darrington Ranger District proposed to restore vehicular access to the Suiattle drainage by making repairs to three segments along Road 26 (MP 14.4, MP 20.9, and MP 22.9). During the years of 2004 to 2006, information was shared with the public through public meetings, the Forest web site, and presentations by Forest staff. There were also numerous articles in major Puget Sound newspapers describing the projects and whom to contact to provide comments on issues related to the proposed actions.
- **2007 to 2011 scoping:** In the spring 2007, Forest Service staff discovered damage in addition to the fall 2006 flood impacts to Road 26. The 2006/2007 damaged sites were located at MP 6.0, MP 12.6, MP 13.0, MP 13.4, and MP 20.8. Since that time, the Forest Service along with FHWA staff have inventoried the new damage and documented it in Damage Survey Reports, which identify what flood damage qualifies for ERFO funding.
- In 2007 and 2008, the Darrington District held open houses in which the various projects on the District, including the Suiattle ERFO projects, were discussed with participants. The Forest Service and FHWA met numerous times from 2007 to 2009 with Tribal representatives, state, and federal agency staff persons, and other specialists in the development of repair options for Suiattle Road 26.
- FHWA decided in 2011 to analyze all 8 damage sites and proposed repairs in one environmental assessment. With the start of this EA, the FHWA sent a scoping pamphlet on the proposed repairs to a mailing list of over 300 interested parties, and posted the information and contacts on their website, <http://www.wfl.fhwa.dot.gov/>. The Forest Service also used their website (<http://www.fs.usda.gov/mbs>) to provide historic information on Suiattle Road 26 and flood damage, and posted a copy of the FHWA pamphlet on the proposed repair action with a link to the FHWA information site. Information on the proposed action was a focus area at the 2011 Darrington Ranger District Open House, held September 15, 2011. The Darrington Open House was attended by approximately 100 individuals. Written comments were received that evening, with additional comments received by email or postal service through 10/20/11.
- March 29, 2012, FHWA and the USFS held a public meeting in Everett, Washington where staff persons were available to answer questions and provide clarification on the March 2012 EA that was available for comment. This public meeting was attended by approximately 62

- individuals, with written comment received that evening and additional comments received by email or postal service through 4/20/12.

2012 EA and A-EA Comments: The FHWA received over 400 comments during the March 2012 30 day comment period (See EA 2012 Comment Summary in Appendices E, and F of the A-EA here: <http://www.wfl.fhwa.dot.gov/projects/wa/suiattle/ea.htm>), and over 240 comments during the August 2012 release of the Amended Environmental Assessment (See A-EA Comment Summary Appendix B). Many commenters who commented on the release of the EA also commented on the release of the A-EA.

Additional Comment:

On September 20, 2012 the Western Environmental Law Center submitted a letter with an attached June 2011 study entitled: *Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl*. This letter reiterated a previous response concern that the A-EA did not adequately analyze noise impacts from road repairs, and suggested that additional analysis in the A-EA was warranted due to this new information.

Concern: Road 26 repairs may have adverse effects on wildlife species with the resumption of automobile traffic resulting in noise levels that would limit use of the area by spotted owls (comment letter with attached 2011 study on acute road noise impacts to spotted owls).

Response : In the case of the 2011 study, the USFS and FHWA have taken a hard look at the information and at the environmental effects of the Selected Alternative and do not find new information in the study which would alter the spotted owl effects determination that was previously consulted on with the FWS for the Road 26 repairs. The FWS reached the same conclusion. The repairs were assessed as having a “may effect, likely to adversely affect spotted owls” due to the noise disturbance from the proposed road repair activities. This effect determination is consistent with studies for acute noise disturbance as described in the 2002 Forest Programmatic Biological Assessment (BA) and Biological Opinion, and in the 2011 study.

The resumption of automobile traffic on Suiattle Road 26 and resulting noise effects are not expected to reach the acute noise levels reported in the 2011 study. The noise levels reported in the 2011 study (around 90 dB from motorcycles equipped for long-distance cross-country competition) were much higher than noise levels associated with routine use of forest roads (40-50 dB). This is a significant difference as noted in the study. The 2011 study found a raised level of fecal glucocorticoids (fGCs), (the hormones most often measured in disturbance studies) in birds subjected to motorcycle noise, but there was no clear association demonstrated of elevated fGC levels with routine forest road traffic or impacts to the northern spotted owl. The 2011 study also noted that the measure of the relationship between fGCs and fitness is not always significant or consistent, and that effects on survival and reproductive success are difficult to quantify. An example was given of a study by Creel et al. (2002) which reported an association between exposures to snowmobiles and elevated fecal glucocorticoid metabolites (fGCs) in wolves and elk, but the study found no evidence of an effect of traffic on population dynamics. A more thorough response to the concern raised in the Western Environmental Law Center letter has been provided by the Forest Service and the FWS in their response letters. (See Appendix C for the Western Law Center letter of 9/20/12 and response letters from the USFWS, USFS and FHWA).

TRIBAL CONSULTATION

As part of its government-to-government responsibility to consult with Native American Tribes, FHWA and the Forest Service have provided the opportunity for involvement in the NEPA process to the Tulalip Tribes, the Upper Skagit Tribal Council, the Swinomish Tribal Community, the Stillaguamish Board of Directors, the Sauk-Suiattle Tribal Council, the Samish Tribe, and the Lummi Indian Business Council. The Sauk-Suiattle Tribe and the Upper Skagit Tribe have been especially involved in the project with participation in field trips and meetings on the design of the project.

The Forest Service and FHWA met several times with the Sauk-Suiattle Indian Tribe regarding the tribe's desire to access gathering areas, and design of the proposed action to minimize impacts to fish and to culturally modified trees (2009 to 2011). The Forest Service met with the Upper Skagit Indian Tribe regarding developing a road repair design that would avoid impact to Chinook salmon rearing habitat at MP 20.8. The proposed repair at Downey Creek with bridge extensions was strongly supported by the Upper Skagit and the Sauk-Suiattle tribe to minimize impacts to fish and restore habitat in the vicinity of the Downey Creek. The result of tribal consultations was the development of a Salmon Recovery Funding Board (SRFB) proposal sponsored by the Skagit River System Cooperative (representing the Sauk-Suiattle and Swinomish Indian Tribes) for the extension of the Downey Creek Bridge and the removal of bridge approach fill and culvert in the floodplain. This SRFB grant was selected in 2011 for funding so there are additional resources available for the bridge extension and restoration of the riparian area at Downey Creek.

FINDING OF NO SIGNIFICANT IMPACT

I have evaluated the effects of the project relative to the definition of significance established by the CEQ Regulations in 40 Code of Federal Regulations (CFR) 1508.27. I have reviewed and considered the EA and the A-EA and documentation included in the Project Record, and I have determined that the Selected Alternative will not have a significant effect on the human environment. As a result, no environmental impact statement will be prepared. I base my finding on the following, organized by sub-section of the CEQ definition of significance cited above.

- 1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial [40 CFR 1508.27(b) (1)].*

In terms of beneficial effects, the Selected Alternative is the alternative that most effectively addresses the stated purpose and need for the project (see Rationale for Decision) and will achieve the anticipated benefits. I assessed the anticipated adverse environmental effects of the Selected Alternative, as detailed in the EA and A-EA Chapter 3, in terms of context and intensity, and I found those effects to be localized, minor, and in most cases temporary. The beneficial effects of the project on the environment including reconnection of wetlands, removal of portions of the road out of the river's active zone, when coupled with the adverse effects, continue to be localized and minor, in the larger scheme of the immediate area.

- 2. The degree to which the proposed action affects public health or safety [40 CFR 1508.27(b) (2)].*

My decision will not adversely affect public health or safety. Roads remaining open to public access will be restored and/or relocated which should benefit the safety of those who use them. Abandoned road segments will be treated to reduce the risk of failures and associated sedimentation into streams.

3. Unique characteristics of the geographic area such as the proximity to historical or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas [40 CFR 1508.27(b) (3)].

My decision will not adversely affect unique characteristics associated with the geographic area such as historical or cultural resources, parklands, wetlands, wild and scenic rivers, or ecologically critical areas. As described in paragraph (8), below, an appropriate cultural resource inventory was conducted for this undertaking. Several cultural resources were located, which have either been determined not-eligible for the National Register of Historic Places (NRHP) or will be avoided during implementation (consultations with the State Historic Preservation Office were concluded in June 2011 and January 2012 for adjustments in proposed design elements at MP 6.0). The Selected Alternative will relocate segments of Road 26 away from the Suiattle River, which would protect the free-flowing characteristics of the Skagit Wild and Scenic River while public access to the Suiattle River will continue to provide undeveloped river access to boaters (A-EA pp.60-62).

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial [40 CFR 1508.27(b) (4)].

The effects of the action on the quality of the human environment, though generating some controversy, do not rise to the level of being highly controversial. There are disagreements about what is best for transportation access in this area and what may be the effect of certain aspects of the project. However, the effects of this project are generally well understood and supported by sound scientific and expert evidence.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks [40 CFR 1508.27(b) (5)].

We have considerable experience with the types of activities to be implemented, and my review of the EA and A-EA Chapter 3 and supporting documentation indicates that the possible environmental effects of implementing the Selected Alternative are typical of this type of project. The effects analysis reports that the possible effects on the human environment do not involve any highly uncertain, unique, or unknown risks. The effects on wildlife habitat and aquatic system components are disclosed in the A-EA (Chapter 3 in Sections 3.7 to 3.11) and are based on sound scientific research, as well as previous experience in the basin and on the Forest. The effects on public use are clearly disclosed in the A-EA (Chapter 3 in Sections 3.1 to 3.6, Section 3.15 and 3.18)

6. The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration [40 CFR 1508.27(b) (6)].

My review of the EA and the A-EA and supporting documentation indicates that implementation of the Selected Alternative will not establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration. Additional road repair or

road management options will likely be considered in the future; however, they will be evaluated in appropriate landscape context, and any decisions will be based on the results of analyses and public participation done at that time.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts [40 CFR 1508.27(b) (7)].

Cumulative actions are described in detail in the A-EA (Appendix H), and in the cumulative effects discussed in each resource-specific section of the A-EA Chapter 3. No significant cumulative effects associated with implementation of the Selected Alternative are identified for any resource.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources [40 CFR 1508.27(b)(8)].

FHWA has coordinated with the Forest Service Heritage Specialist so that the analysis in the EA and A-EA (Chapter 3 Section 3.13) and my decision is in compliance with Section 106 of the National Historic Preservation Act (NHPA) under the terms of the 1997 Programmatic Agreement regarding cultural resources management on National Forests in the State of Washington among the USDA Forest Service Pacific Northwest Region (Region 6), the Advisory Council on Historic Preservation, and the Washington State Historic Preservation Officer (See EA and A-EA Chapter 3, Section 3.13 and Chapter 4).

Mitigation measures in the EA and A-EA Table 2 (Appendix A) also address any sites or objects discovered during project implementation. If a previously unidentified property is discovered during project implementation, FHWA and the USFS will fulfill its consultation requirements including consultation with the State Historic Preservation Officer (SHPO) and any potentially affected Tribes.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973 [40 CFR 1508.27(b) (9)].

In regard to plant species, no federally listed plant species are known to occur on the Forest, and none were identified in the project area during past surveys. Thus it is concluded that the Selected Alternative will have “No Effect” on federally listed plant species.

In regard to federally listed fish, activities associated with Selected Alternative will maintain the trends in Chinook, steelhead and bull trout populations at the scale of the Sauk sub-basin and Suiattle River watershed. Project activities will not measurably improve or degrade fish populations at these scales due to the limited extent of effects. The effect determinations for Chinook salmon, steelhead and bull trout are *May Affect, Not Likely to Adversely Affect*. The effect determination for activities associated with the Selected Alternative is also a *May Affect, Not Likely to Adversely Affect* determination for designated Chinook salmon and bull trout critical habitat because while activities would add sediments, they would not significantly degrade spawning, rearing, or migration habitats.

In regard to federally-listed wildlife, Section 7 consultations on the Suiattle Road 26 ERFO Project were completed in both formal and informal Biological Assessments and Biological Opinions with US Fish and Wildlife Service staff in 2005, 2010, and 2011 with concurrence on the following effects calls. The Selected Alternative was determined to have “*no effect*” for grizzly bear and gray wolf. The Selected Alternative is a “*may effect, not likely to adversely affect*” risk determination for spotted owl and spotted owl critical habitat due to short-term impacts of potential noise disturbance from road repair activities in areas adjacent to mature and old-growth forest (See A-EA Chapter 3, Section 3.11). The Selected Alternative is also a “*may effect, likely to adversely affect*” risk assessment for marbled murrelet critical habitat due to the reroute removal of approximately eight acres of forest within critical habitat. The removal of trees considered primary constituent element 2, will degrade habitat, but not impair the critical habitat unit’s ability to provide for the conservation of the murrelet or spotted owl.

I have reviewed the degree to which the action may adversely affect an endangered or threatened species or critical habitat under the Endangered Species Act of 1973 as documented in consultations with U.S. Fish and Wildlife Service and National Marine Fisheries Service (See Chapter 3 of the A-EA, Sections 3.7 and 3.11 and Chapter 4). The Selected Alternative may effect, but is not likely to adversely affect endangered or threatened species or its habitat that has been determined to be critical; this due to project design and conservation measures identified through Section 7 consultation with the USFWS and NMFS (See A-EA Chapter 3, Sections 3.7 and 3.11). Conservation measures to reduce effects to listed species are displayed in A-EA, Table 2.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment [40 CFR 1508.27(b) (10)].

Based on my review of the EA and supporting specialist reports, implementation of the Selected Alternative will be consistent with all federal, State, and local laws imposed for the protection of the environment. Applicable laws and regulations were considered in the A-EA various sections. The action is consistent with the National Forest System roads, and will be consistent with the MBS Forest Plan, the Forest Roads Analysis, and the USFS ATM (See A-EA section 3.2.2).

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

USDOT Section 4(f)

Section 4(f) of the Department of Transportation (DOT) Act of 1966 states that “the Secretary shall not approve any program or project which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance as determined by the Federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State, or local significance as so determined by such officials unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreation areas, wildlife and waterfowl refuge, or historic sites resulting from such use.”

Resources covered by Section 4(f) include historic sites and recreational sites. Neither of the action alternatives will use any recreational resource for purposes of Section 4(f), except for a potential use of the wild and scenic river corridor.

The FHWA proposes that any use of the corridor falls within the *De minimis* provision of the statute and regulations, and is seeking comment on this proposal concurrent with the NEPA public comment period. No comments were received during the March 2012 public comment period.

FHWA has determined the archaeological sites identified during the cultural resources survey are Section 4(f) resources, but are exempt from further evaluation under the Act because they are important chiefly for what can be learned by data recovery and have a minimal value for preservation in place per 23 CFR 774.13(b)(1)and(2). The FHWA notified the Washington SHPO/Department of Archeology and Historic Preservation (DAHP), as the official with jurisdiction, of this determination in a letter dated January 21, 2010. The DAHP has not objected to the exemption.

Other Laws and Regulations

I have reviewed each resource-specific section in the A-EA Chapter 3 and determined that each addresses compliance with all applicable laws and regulations. I have also reviewed "Other Environmental Components" in Chapter 3, Sections 3.14 to 3.21 of the A-EA that confirms compliance with laws and regulations associated with air quality; environmental justice; parklands, prime forestland, prime farmland, and prime rangeland; irreversible or irretrievable commitment of resources; potential conflicts with plans or policies of other jurisdictions, climate and Section 4 (f) of the US Department of Transportation Act of 1966.

National Forest Management Act Consistency

This decision to repair eight storm damaged sites to pre-storm conditions is consistent with the intent of the MBS Forest Plan's long term goals and objectives listed in A-EA section 3.2.2. The project was designed in conformance with land and resource management plan standards and incorporates appropriate land and resource management plan guidelines (The National Forest Management Act [NFMA] and its regulations [36 CFR 219] established guidance for National Forest planning and management). As required by NFMA regulations, I reviewed the A-EA and find this project will be consistent with the MBS Forest Plan, as amended. A-EA Chapter 3 contains the Forest Plan consistency analysis for each resource affected by the Selected Alternative. The action will not alter the multiple-use goals and objectives for long-term land and resource management.

In regard to the use of the best available science, I find that the A-EA and material in the Project Record document a thorough review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgement of incomplete or unavailable information, scientific uncertainty, and risk.

CONTACT

For additional information concerning this decision, contact Denise E. Steele, Environmental Protection Specialist, Federal Highway Administration, Western Federal Lands, 610 E Fifth Street, Vancouver, WA 98661, (360) 619-7593.

CONCLUSION

FHWA finds the EA and the A-EA, including the attached *Response to Comments* described above, and related documentation adequately and accurately address the need, environmental

issues, impacts of the proposed action, and contains appropriate mitigation measures. Furthermore, FHWA finds that the EA and the A-EA, including the information listed above, documents full compliance with the NEPA and other related environmental laws, executive orders, and implementing regulations. The EA, A-EA with the supplemental information in this Decision Document and FONSI provides sufficient evidence and analyses for determining that the proposed project will have no significant impact on the environment and that an Environmental Impact Statement is not required.

APPENDIX A MITIGATION MEASURES

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
<i>Soil, Water Resources, and Fisheries</i>				
A Spill Prevention, Control, and Countermeasures Plan or a Hazardous Spill Plan would be implemented during construction activities to reduce the potential for chemical spills and transport to nearby stream.	Prevent and minimize effects to water quality.	MODERATE (Implementation of spill plans are an industry standard)	Forest Plan S&Gs Soil Resource #2; Water Resources and Riparian Area #2	Contract Administrator
Have hazardous spill cleanup materials and trained operators on site. Fuel trucks must also carry spill cleanup materials.	Prior to starting work each day, check all machinery for leaks (fuel, oil, hydraulic fluid, etc); make all necessary repairs before leaving the vehicle staging area and entering a Riparian Reserve.			
All machinery maintenance involving potential contaminants (fuel, oil, hydraulic fluid, etc.) shall occur at a site greater than 150 feet from stream channels, water bodies, or wetlands, or at a prior approved site. Equipment operated instream should be cleaned before beginning operations below the bankfull elevation to remove all external oil, grease, dirt, and mud.	Prevent and minimize effects to water quality and aquatic resources.	MODERATE (Implementation of spill machinery maintenance and operation are an industry standard)	Forest Plan S&Gs Soil Resource #2; Water Resources and Riparian Area #2	Contract Administrator
Stationary power equipment (e.g., generators, cranes) operated within 150 feet of any stream, water body, or wetland should be diapered to prevent leaks.				

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
<i>Soil, Water Resources, and Fisheries</i>				
Excess material (spoils) shall be disposed of and stabilized so it does not enter flowing waters, stream channels, or other water bodies.	Prevent and minimize effects to water quality.	MODERATE (Logic)	Forest Plan S&Gs Soil Resource #2; Water Resources and Riparian Area #2; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator
Wastewater from project activities and water removed from within the work area shall be routed to an area landward of the 100-year floodplain to allow removal of fine sediment and other contaminants prior to being discharged to the stream.	Minimize sedimentation to fish-bearing waters and protect aquatic resources.	MODERATE (Logic)	USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005); Forest Plan S&Gs Fish Habitat Management #; ROD S&G RF-51	Contract Administrator
Stabilize all work areas within 3 days following the construction period.	Minimize sedimentation to fish-bearing waters. Protect stream bank integrity and aquatic resources.	MODERATE (Burroughs 1989)	Forest Plan S&Gs Soil Resources #5; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
Soil, Water Resources, and Fisheries				
Site restoration and cleanup includes protection of bare earth by seeding, planting, mulching, and fertilizing. All damage areas at the project site are to be restored to pre-work conditions, including restoration of the pre-flood conditions, including channel bank slope and contours, to the extent practicable.	Minimize sedimentation to fish-bearing waters. Protect stream bank integrity and aquatic resources.	MODERATE (Burroughs 1989; Switalski et al. 2004)	Forest Plan S&Gs Soil Resource #4; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator
All disturbed ground shall be reclaimed using appropriate best management practices.	Prevent silt-laden water from entering streams. Prevent and minimize effects to water quality. Protect stream bank integrity and aquatic resources.	MODERATE (Burroughs 1989; Madej 2001; Switalski et al. 2004)	Forest Plan S&Gs Soil Resource #5; ROD for preventing and managing invasive plants in the Pacific NW S&G #13 (Forest Service 2005); BMPs R-12; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator
Retain measures to prevent sediment from reaching streams until the soil is secure.				
If appropriate, native species should be used in revegetation. Disturbed ground where runoff has the potential to drain into stream channels shall be revegetated or protected from surface erosion by seeding, mulching, or other methods prior to the fall rainy season.				
Within 1 year after project completion, disturbed stream banks would be revegetated with woody vegetation to maintain soil stability and provide shade and future sources of instream large woody debris (LWD).				

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
Soil, Water Resources, and Fisheries				
Segments of the road decommissioned, placed in storage, or disturbed by construction activities would be revegetated	Prevent silt-laden water from entering the streams or other waterbodies. Reduce the effects of lost soil productivity.	MODERATE (Luce 1997; Burroughs 1989; Switalski et al. 2004)	ROD S&G RF-2, RF-3, RF-4, RF-5	Contract Administrator
When constructing or decommissioning roads:	<ul style="list-style-type: none"> • Outslope the roadway surface unless outslipping would increase sediment delivery to streams or where outslipping is infeasible. • Route road drainage away from channels and potentially unstable hill slopes. • Where necessary, install water bars to route water away from streams to allow removal of fine sediment and other contaminants before discharge to the stream. 	MODERATE (Years of use by agency) HIGH (Water bars are an industry standard and have been shown to be effective on closed roads)	ROD S&G RF-5; BMPs R-1, R-3, R-4, R-5, R-7, R-8, R-9, R-11, R-12, R-14	Contract Administrator
All non-treated wood present in the river/stream shall be left in place (a measure designed to protect existing LWD in the stream channel).	Protect stream bank integrity and aquatic resources.	HIGH (Avoids damage that would occur if trees were removed)	ROD S&G FA-2; Forest Plan S & G's Water Resources and Riparian Reserves #2, #7, and #8; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
Soil, Water Resources, and Fisheries	<p>Protect stream bank integrity and aquatic resources. Maintain routing of large wood in channel network.</p> <p>The disposition of down wood, such as blowdown or felled hazard trees would be determined based on the Forest woody debris policy with priority given to retaining onsite or stockpiled for use in restoration projects.</p> <p>Move LWD at all streamside construction sites, and place along the riprap where feasible, if this would protect structures and improve stream habitat.</p> <p>A Forest Service aquatic specialist would coordinate with FHWA prior to construction to obtain the limits of clearing and perform a field review of the trees that should be felled and those that should remain.</p> <p>Stream banks shall be properly sloped to an angle of stability (natural repose) when removing culverts.</p> <p>Boundaries of the clearing limits associated with site access and construction shall be flagged to prevent ground disturbance of critical riparian vegetation, wetlands, and other sensitive sites beyond the flagged boundaries.</p>	<p>HIGH (Avoidance) LOW (Experience shows wood is often broken during removal and placement is often difficult)</p> <p>(NOAA/NMFS) Biological and Conference Opinion (October 28, 2005) ACS Obj. 6</p>	<p>Forest Plan S&Gs Water Resources #2, #5, #8; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)</p>	Contract Administrator

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
Soil, Water Resources, and Fisheries				
When breaking up natural (boulder/bedrock) or man-made (bridge decking, piers, abutments) materials using hydraulic breaker, or test drilling, the following measures shall be done (when appropriate): <ul style="list-style-type: none"> • Prevent spoils from operations from entering the active channel • Monitor the underwater sound/vibration effects of hydraulic breaker operations at the various horizontal distances from the site using underwater sound-detection equipment 	Protect aquatic resources.	MODERATE (Logic)	USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator
Minimize roads in Riparian Reserves. The location, design, and reconstruction of necessary crossings should minimize disruption to natural hydrologic paths and adverse effects to aquatic resources. Avoid sidecasting of loose material. Accommodate at least the 100-year flood, and associated bedload and debris.	Maintain surface hydrology and Riparian Reserve function and integrity.	HIGH (Avoidance)	ROD S&G RF-2, RF-4; BMPs T-8, T-10, T-11, R-1, R-6, R-11, R-12, R-14; Forest Plan S&Gs Water Resources and Riparian Reserves #6	Contract Administrator
Post-construction measures requiring ground disturbing work likely to cause erosion shall be implemented during the dry season of the year but still must fall within the designated in-water work windows.	Minimize sedimentation to fish-bearing waters.	HIGH (Logic)	MOU between FS and WDFW for hydraulic projects (2005)	Contract Administrator
A qualified Forest Service biologist would perform periodic site inspections during construction to ensure that the project is progressing as planned and that there are no unintended consequences to fish, wildlife, plants, and their habitats.	Protect aquatic resources and fish, wildlife, plants, and their habitats.	MODERATE (Logic)	Forest Plan S&Gs Fish Habitat Management #1; USFWS Biological Opinion and Conference Report (August 16, 2005) and USDC (NOAA/NMFS) Biological and Conference Opinion (October 28, 2005)	Contract Administrator

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
Wildlife	<p>To minimize the likelihood of adverse effects to nesting marbled murrelet, all project activities would occur between 2 hours after sunrise and 2 hours before sunset, from May 1 to September 15 each year. Timing restrictions are considered successful by eliminating sources of disturbance during the critical breeding period.</p> <p>The timing restrictions that would be implemented reduce potential adverse effects to post-incubating murrelets, but would not mitigate possible effects on incubating birds.</p>	<p>Eliminate sources of disturbance during the critical breeding period.</p> <p>HIGH [MBS Forest experience, Biological Opinion (USFWS 2005)]</p> <p>In the post-incubation stage, 90 percent of feedings by adults occur within two hours of sunrise and sunset; therefore, mitigation measure would dramatically reduce the potential disruption of feeding.</p>	<p>Biological Opinion of the Effects of the Mount Baker-Snoqualmie National Forest Program of Activities for 2003-2007 on Marbled Murrelets and Northern Spotted Owls (USFWS 2002a)</p>	<p>Contract Administrator</p>

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Forest Plan Standard & Guideline	Enforcement
Botany					
If any previously undiscovered Threatened, Endangered, and Sensitive (or other rare or uncommon) vascular plants, bryophytes, lichens, or fungi are discovered, before or during project implementation, halt work until a Forest Service botanist is consulted and necessary mitigation measures are enacted.	Prevent impact to TES or S&M plants.	HIGH (logic)	Forest Plan S&G Threatened, Endangered, and Sensitive Species #1	Contract Administrator	
Equipment brought on to the National Forest must be free of weeds and weed seeds. If weeds are present in the project area, all equipment and gear should be cleaned before leaving the area to avoid spreading the infestation further.	Prevent introduction of weeds. Prevent weed spread.	MODERATE (Forest Service 2005) HIGH (Logic)	Forest Plan S&G Wilderness – (Vegetation) #1; Forest Plan S&Gs Vegetation Management #2; ROD for preventing and managing invasive plants in the Pacific NW S&G #2 (Forest Service 2005)	Contract Administrator; District Botanist	
All gravel, fill, and borrow material sources must be weed free.	Prevent introduction of weeds.	MODERATE (Forest Service 2005)	ROD for preventing and managing invasive plants in the Pacific NW S&G #7 (Forest Service 2005)	Contract Administrator;	
Use weed free straw and mulch for all projects conducted or authorized by the Forest Service on National Forest System lands.	Prevent introduction of weeds.	HIGH (Forest Service 2005)	ROD for preventing and managing invasive plants in the Pacific NW S&G #3 (Forest Service 2005)	Contract Administrator;	
For known infestations of noxious weeds, schedule appropriate weed treatments including R6-approved herbicides.	Eradicate known infestations.	HIGH (Forest Service 2005)	ROD for preventing and managing invasive plants in the Pacific NW S&G #16 (Forest Service 2005)	Contract Administrator;	

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement	
Botany	<p>Any seed used for revegetation shall be tested using standards of the Association of Official Seed Analysts (WSCIA 2003) and pass State standards for noxious weeds prior to use (WAC 16-302-100).</p> <p>Abandoned roads and new cut and fill slopes would be seeded and mulched to deter the establishment of noxious weeds. Fertilizer is not recommended. Seed and straw mulch must be free of weeds and weed seeds. One to two inches of weed free straw should be placed over the seed. The seed mix to use consists of the following:</p> <ul style="list-style-type: none"> • Tufted hairgrass (<i>Deschampsia caespitosa</i>) @ 4 lbs/acre • Annual ryegrass (<i>Lolium multiflorum</i>) @ 10 lbs/acre • Winter triticale (<i>Triticum aestivum x Secale cereale</i>) @ 60 lbs/acre • Alsike clover (<i>Trifolium hybridum</i>) @ 2 lbs/acre <p>The location of any soil material moved off-site must be made known to the Botanist for monitoring purposes.</p>	<p>Prevent introduction and spread of weeds.</p> <p>Prevent introduction and spread of weeds.</p>	<p>HIGH (Forest Service 2005)</p> <p>HIGH (Forest Service 2005)</p>	<p>ROD for preventing and managing invasive plants in the Pacific NW (Forest Service 2005)</p> <p>Forest Plan Best Management Practices; ROD for preventing and managing invasive plants in the Pacific NW S&G #3 (Forest Service 2005)</p> <p>ROD for preventing and managing invasive plants in the Pacific NW S&G #8 (Forest Service 2005)</p>	<p>Contract Administrator; District Botanist</p> <p>Contract Administrator; District Botanist</p> <p>Contract Administrator; District Botanist</p>

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Forest Plan Enforcement
Heritage Resources If a previously unidentified heritage resource were discovered during project implementation, or if an identified resource were affected in an unanticipated way, the Forest Heritage Specialist would be notified and the Forest would fulfill its responsibilities in accordance with the Programmatic Agreement between the Forest Service and the State Historic Preservation Office regarding cultural resource management on National Forests in the State of Washington.	Protect cultural resources.	MODERATE (Experience)	Forest Plan, Archaeology Protection, p. 4-99 36 CFR 800 regulations of the National Historic Preservation Act.	Contract Administrator, Forest Heritage Specialist

Table 2. Management Requirements and Mitigation Measures (continued)

Mitigation Measure or Project Design Feature	Objective	Effectiveness and Basis	Forest Plan Standard & Guideline	Enforcement
Recreation Alternatives B & C Road 26 would be kept open to all vehicles to MP 12.5, where the existing temporary gate will remain, and a suitable turnaround and parking area for 10 vehicles will be created, utilizing the already wide section of road through this area. Beyond MP 12.5 the road is to be kept open to foot traffic, stock use, bicycle use and administrative traffic (as practicable) except when there are hazardous conditions. <ul style="list-style-type: none">• The closure for hazardous conditions at any work site would occur between the hours of 0700 to 1200 and from 1300 to 1700 during weekdays, as needed.• Signage would be installed, stating the hours and times of closed/open access at MP 12.5 and at MP 15.0 or 23.0 (as appropriate)• A travel plan that would use the existing road and designated signed detour routes around the project area(s) shall be approved by the Forest Service prior to starting construction activities.• Construction fencing and other appropriate hardware would be used to designate the passage around the project area(s).• If longer delays or closures are necessary for specific construction activities, advance public notice (a minimum of 2 weeks) is required before those delays or closures. This includes notice to local radio stations and newspapers within a 75 mile radius of the project area, and notification to the District Ranger and Forest Service liaison for this project.	Minimize effects on recreationist and other forest users	High (experience)	1990 Forest Plan p. 4-84, 4-140	Contracting Officer Representative (COR) for road projects Forest Service Liaison

Alternative B
The detour routes around Downey Creek and Sulphur Creek Bridge project areas could include horse fords, foot logs, and/or ladders to access the bridge decks.

APPENDIX B RESPONSE TO COMMENTS FROM RELEASE OF A-EA

Date of Comment	Comment	Comment Summary and/or Alternative Preferred ABC	Action Item and/or Response
1. 09/16/12 email	Please repair the Suiattle Road to milepost 23. I support Alternative B.	B	Thank you, your comment is noted.
2. 09/14/12 email	I own 10 acres of land on the Suiattle River at approx. milepost 9 on FS Road #26. I have reviewed the EA and fully support the proposed actions.	B/C	Thank you, your comment is noted.
3. 09/14/12 email	Please fix road to end. We are hurting access to prime beautiful recreation space. I personally have postponed a lifelong bucket-list trip for almost a decade because of access issues. Fix the road to the end!	B	Thank you, your comment is noted.
4. 09/14/12 email	I am writing to reiterate my support of Alternative B for the Suiattle River Road. This road should be repaired to the Suiattle Trailhead and this repair is already fully funded. Repairing the Suiattle River Road will restore an <i>incredible</i> amount of access for the widest variety of recreationists across the board, as well as re-enabling culturally significant activities of affected Indian tribes. Repairing this one road will also dramatically reduce overuse that has increased in other nearby recreational areas such as the North Fork Sauk. Alternative B will also include the already fully funded (by Salmon Recovery Board Fund) repair/upgrade of the Downey Creek crossing improving fish habitat; this is also supported by the Indian tribes and all biologists who have had input into this project. The project proposes using an old logging road around washouts 2, 3 and 4 to get the road to a higher elevation, out of wetlands and outside the Wild and Scenic River boundary and will eliminate the threat of future washouts. This new connector road will NOT pass through old-growth - far from it, it has all been logged or burned in the last century. Furthermore, the existing road that goes through wetlands will be removed and the area rehabilitated. It will actually be better environmentally than it is now. Finally, the Sulphur Creek Campground and the huge existing paved parking lot at the end are all in great shape. It is illogical to consider closing this section.	B	Thank you, your comment is noted.
	In conclusion - Alternative B is fully funded, has no significant environmental risk according to the experts that have contributed to the EA and it repairs the road to the 2003 terminus at Suiattle Trailhead - restoring all our access. Let's do it!		
5. 09/14/12 email	1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. 2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations. 3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. 4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.	B, 9 different individuals sent in this exact comment	Thank you, your comment is noted.

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	5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.		
6. 09/14/12 email	I know this is late but I hope the road to Glacier Peak can be rebuilt to allow a new generation of climbers the chance to experience the beauty of Glacier Peak.	B/C	Thank you, your comment is noted.
7. 09/14/12 email	I am a BCHW member who rides the crest trail and other back woods areas and would like the alternate B supported. I was just up on the crest today and in to the Norse Peak wilderness. This is possible because of the excellent trail access and I think the Suiattle River road should be repaired so campers and horse/mule people can get in. We did a big work party at Government Meadows this July and it requires horses/mules to pack gravel and equipment into the wilderness areas for work.	B	Thank you, your comment is noted.
8. 09/13/12 email	Please repair the Suiattle River Road to its end. Thank you.	B	Thank you, your comment is noted.
9. 09/12/12 email	I know this is a day late, but I just saw the opportunity to comment on this, and I would very much like to add my voice to those asking that you do repair the Suiattle River Road. Some of the best hikes in the area are along that road, but the road closure makes the approach prohibitively difficult for dayhiking. I miss those hikes and if there is a way, I (and no doubt countless others) would be so grateful to get that access back.	B/C	Thank you, your comment is noted.
10. 09/11/12 email	I strongly support Alternative B to reopen the Suiattle River Road to its end at milepost 23. Please pursue this project to reopen the road ASAP	B	Thank you, your comment is noted.
11. 09/11/12 email	I support Alternative B, which will repair the road to its end at milepost 23. This is an outstanding hiking and overall outdoor experience opportunity and one that should receive as high priority as possible.	B	Thank you, your comment is noted.
12. 09/11/12 email	To whom it may concern: I wrote and extensive note prior and want to reiterate my stance to reopen the Suiattle river road to the former trailhead.	B	Thank you, your comment is noted.
13. 09/11/12 email	I would like to submit my comment to have the Suiattle River road open all the way to Sulphur Creek Trailhead. I am frustrated and am not certain why we must do this...again.	B	Thank you, your comment is noted.
14. 09/11/12 email	Please find our attached comments for the Suiattle River Road Amended Environmental Assessment.	B	Thank you, your comment is noted.
	Thank you for the opportunity to comment on the Suiattle River Road Project Amended Environmental Assessment (AEA) dated August 2012. The Suiattle River Road provides critical access to some of the more remote and pristine sections of the Pacific Crest National Scenic Trail (PCT), therefore, we are writing to express our continued support to restore the Suiattle River Road to its original terminus.		
	In addition to providing a plethora of outstanding recreational opportunities, the Suiattle River Road provides critical access also needed for trail maintenance projects. In 2003, the flood washed away three major trail bridges on the PCT in the area. The lack of road access caused extreme logistical challenges while working to replace some of these existing structures. As funding for Forest Service staff continues to be squeezed, volunteer stewardship opportunities are being recognized as a long-term, sustainable way to take care of our public lands. The number of volunteer projects that are being hosted by PCTA and our partners are growing every year. It will not be practical to expect volunteers to travel such a long distance to reach the PCT. Consequently, less and less trail maintenance will be done resulting in a less desirable trail experience with		

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	increasing safety concerns.	The PCT was designated by Congress in 1968 as part of the National Scenic Trails System Act (Public Law 90-543). The PCT extends for 2,650 miles from Mexico to Canada through some of our nation's most wild, remote, pristine, and scenic areas. It passes through 3 National Monuments, 7 National Parks, 24 National Forests, and 33 Federally Designated Wilderness Areas. Zigzagging its way through California, Oregon and Washington the PCT boasts the greatest elevation changes of any of America's National Scenic Trails, allowing it to pass through six out of seven of North America's ecozones including high and low desert, old-growth forest and arctic-alpine country. Indeed, the PCT is a trail of diversity and extremes. It is one of America's great scenic treasures that should remain reasonably accessible for all to enjoy.	
		The Pacific Crest Trail Association (PCTA) is a non-profit organization with more than 9000 members. Our mission is to protect, preserve and promote the PCT as an internationally significant resource for the enjoyment of hikers and equestrians, and for the value that wild and scenic lands provide to all people. A Memorandum of Understanding signed by the PCTA, the US Forest Service (USFS), the Bureau of Land Management, and the National Park Service "recognize(s) the PCTA as the major partner in the management and operations of the PCT." In 2011, programs organized under the PCTA's leadership and coordination provided over 118,000 hours of volunteer labor to manage the trail on the ground with an in-kind value exceeding \$2.5 million.	
15. 09/10/12 email	I vote for Alternative B, with road access to MP 23 for the Suiattle River road. I am an avid outdoor hiker/backpacker and think that this plan is reasonable approach to management of this area.	B	Thank you, your comment is noted.
16. 09/10/12 email	Perhaps we have commented on this already but if once is good, twice is better. We have had a cabin on the Sauk River since 1973 and hike in the area as much as we can. Having the Suiattle river road opened again before we're dead and gone would be a real gift. Please open the road all the way to the Sulphur Creek trailhead. It's long overdue. We hiked up to the Green Mountain lookout in 2002. It's amazing to realize over a decade will go by before ALL can enjoy it to its end, not just individuals who can bicycle the road. Opening this road will be a boon to the whole area. We have had a cabin on the Sauk River for almost 40 years and have a great love for this area. We feel opening up the road again, all the way to the end, would be the best use of resources. To think it's been almost 10 years since the entire road was accessible to vehicles is amazing. Of course there are those lucky folks who do bicycle down the road but not all are in that condition. Please record our comments about being in favor of the road being repaired all the way to the end. And, while you're at it, see if you can save the Green Mountain Lookout...we don't ask for much, do we?	B	Thank you, your comment is noted.
17. 09/10/12 email	I support Alternative B which provides repairing the Suiattle River Road to its previous endpoint at milepost 23.0. I was camped near the old PCT Skyline Bridge across the Suiattle River during the 2003 Suiattle River flood. In fact, I was on the PCT Skyline bridge about 20 minutes before it broke apart (the span section across the old main channel was explosively ripped out first with a tremendous lightning bolt like crash of sound). My car was stranded at the old Suiattle river trail head parking lot. Thankfully a bit before Thanksgiving, I was able to retrieve my car when the Forest service built a	B	Thank you, your comment is noted.

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	Temporary ramp at the Downey Creek bridge, which was then immediately completely removed (along with the remaining fill from the old approach) to protect the fish. In early November 2006, I was parked at the road end construction blockade near the rampless Downey Creek Bridge. I left in the rain Sunday night November 5th 2006 (last car at the blockade) just hours before the rising flood took out the road again. It would have been extremely embarrassing to have my blue Honda get stranded again at the end of the road again, so I wasn't going to let that happen. If you repair the road up to the old trailhead, I promise to try not to strand my car at the trailhead if another flood takes the road out. My current access to the Suiattle river valley and Glacier Peak, is via the Buck Creek Pass trail from Trinity on the East side of Glacier Peak. However, it would be a tremendous benefit to many hikers to have the old Suiattle River Trailhead access restored.		
18. 09/10/12 email	I support Alternative B. I am very upset that 10 years have gone by and nothing has improved.	B	Thank you, your comment is noted.
19. 09/10/12 email	Since 1970, I have been hiking and backpacking in the Glacier Peak Wilderness Area where I once worked as a Wilderness Ranger stationed at Image Lake on the Darrington Ranger District. However, since the flood of 2003, access to the Glacier Peak Wilderness Area has been seriously limited, mainly because of the partial destruction of the Suiattle River Road and its closure 10.5 miles west of the Suiattle River trail #784. The extra mileage to the trailhead adds a full day for anyone wanting to gain access to the Glacier Peak Wilderness Area. Additionally, the Suiattle River Road is currently only one of two roads on the west side of the Cascades enabling hikers to gain access to the Glacier Peak Wilderness Area. If the Suiattle River Road is not repaired and fully opened to the Suiattle River trail #784 trailhead, fewer people will have reasonable access to the Glacier Peak Wilderness Area, and most likely the only people who will reach the backcountry will be the very fit and the very determined. And that's OK, if the goal of the powers that be is to limit access to wilderness areas. However, if by catering to an "elite" group of hikers, your office needs to realize that by making out of bounds for most folks the beauty of the Glacier Peak Wilderness Area, it is highly likely that a continued interest in the value of wilderness will be sustainable. I.e., it becomes a case of out-of-sight, out-of-mind. Yes, wilderness areas need to be protected, but not in such a way so it excludes folks from reasonable access to a trailhead. So for what it is worth, I strongly urge the DOT to grant the USFS and the Darrington Ranger District the right to repair the Suiattle River Road so that hikers can drive its full length to the Suiattle River trailhead and once again have reasonable access to the Glacier Peak Wilderness Area.	B	Thank you, your comment is noted.
20. 09/10/12 email	Task that you please repair the Suiattle River Road to Milepost 23, Alternative B. That is a spectacular area to hike in that has been inaccessible for many years	B	Thank you, your comment is noted.
21. 09/10/12 email	I enthusiastically support Alternative B as described in the August 2012 Revised EA Document. There are no significant environmental impacts as a result of the project and for the most part there are substantial improvements to the environment compared to doing nothing or only partially repairing the road. As a hiker, amateur photographer, mountaineer and former volunteer Operations Leader for 25	B	Thank you, your comment is noted.

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	<p>Years in Everett Mountain Rescue, I can testify that this road is the most important western access for recreation in the North Cascades. It has become even more significant after the loss of the White Chuck River road and trail to Glacier Peak and its connections to the Pacific Crest Trail. The Suiattle River Road provides access to seven trails and two car-campgrounds, all of which have been inaccessible other than on foot or bicycle for the past six years. The Forest Service identified this road as a High Need Road for all vehicle types in their 2003 analysis.</p> <p>The loss of this road and the White Chuck as an access to the Pacific Crest Trail and Glacier Peak has focused all climbers, horses and hikers in the White Pass area. The detrimental impact of this heavy traffic is noticeable on the trail and the alpine meadows.</p> <p>The Alternative B proposal has several attractive features:</p> <p>At Sites 1 through 5, the road is rerouted well away from the river and will ensure against future erosion as well as removing it from wetlands. The removal of trees is minimized by utilizing the route of a former logging road at higher elevation. This also includes rehabilitation of the old road route and wetlands to their natural state.</p> <p>At Site 6, the road is also moved further away from the existing bank and reduces the future risk of erosion.</p> <p>Site 7 and 8, the Downey and Sulphur Creek bridge approaches, are modified to allow the natural flow of high water without damage to the road and are endorsed by the Tribes, the National Marine Fisheries Service and other experts that have contributed to the EA.</p> <p>Access to Sulphur Creek Campground, the primitive Downey Creek Campground, the Downey Creek Trail, the Sulphur Creek and Mountain Trails, Milk Creek Trail, Suiattle River Trail and all the other trails and routes these connect to – is restored to all user groups.</p> <p>It allows use of the large existing and undamaged parking lot at the road end that is already capable of handling the traffic.</p> <p>I am confident from the EA that there is no significant environmental impact to this option and that it is supported by expert evaluation in the EA.</p> <p>I am against Alternatives A and C because both these options would deny most recreational users access to the trails and campgrounds at the end of this road. Alternative A, doing nothing, makes it a full day's journey to the end of the road and back on either foot or bicycle. Alternative C only restores about half the road and would still require 4 to 5 miles walk each way to get to the most popular trailheads at the end of the road. In order to reach the existing Wilderness camps, such as on Miners Ridge, the added distance would put this out of reach for most hikers in one day. This would result in new camps being established at lower elevations in the Wilderness Area, which would have significant environmental impact. Furthermore, a new terminal parking area established near the Green Mountain Road or Pasture would result in dangerous traffic conflict between vehicles, horses and pedestrians.</p> <p>Alternative B is the best option, and I'm confident that with the standard engineering and construction practices set forth in the EA, there is no significant environmental impact.</p>		
22. 09/10/12 email	I am member of the Back Country Horsemen of Washington.(Tahoma chapter) who utilizes the back country, for pleasure riding and I contribute to trail work and maintenance. Choose alt. B!	B	Thank you, your comment is noted.
23. 09/10/12 email	I fully support alternative B. Reopen the road. While i appreciate the thoroughness of the EA even the "unique comments" were answered, i hope	B	Thank you, your comment is noted.

Date of Comment	Comment	Comment Summary and/or Alternative Preferred ABC	Action Item and/or Response	
24.	09/10/12 email	this is the last comment period. I don't see any value in yet another comment period. Really how many times do we have to repeat this process to find the same result.	B/C	Thank you, your comment is noted.
25.	09/10/12 email	I would like to take this last chance to give my full support to the rebuilding and opening to the public Suiattle River Road #26. This will again provide invaluable access to the Glacier Peak Wilderness Area.	B	Thank you, your comment is noted.
26.	09/10/12 email	Please support Alternative B which will help repair Suiattle River Road to its end at milepost 23. It is an important access point for many forest users.	B/C	Thank you, your comment is noted.
27.	09/10/12 email	I am giving my full support to the rebuilding of the Suiattle River Road Nr.26.	B	Thank you, your comment is noted.
28.	09/10/12 email	I am writing to let the Forest Service know that I am in favor of repairing the Suiattle River Road to the Sulphur Creek Campground. Please expedite this repair as soon as possible.	B	Thank you, your comment is noted.
29.	09/10/12 email	I would like to see Alternative B, allowing access to milepost 23 for the Suiattle River Road. This area needs this kind of access for the increasing populations in WA to be able to get out and recreate. This proposal does not negatively impact the environment and strikes a good balance between protection and access.	B	Thank you, your comment is noted.
30.	09/10/12 email	I have read the proposals that are being considered and support Alternative B for a full repair of the Suiattle River Road.	B	Thank you, your comment is noted.
31.	09/10/12 email	I am writing today in support of Alternative B, which would rebuild the Suiattle River road to its past end. That road provides access to so many cool places, and people should be able to visit them!	B	Thank you, your comment is noted.
32.	09/10/12 email	Alternative B, repair of the Suiattle Road IFS26 to the current trail head, should be initiated without further delay. Important and popular public access has been denied for too long. Do the right thing and repair the road as proposed in alternative B; repair to the current road end. Extremist groups have delayed and wasted public funds for this project for too long. Road and trails access is very important to the local economy and visitors from around the world. The public depends and trusts managing agencies to maintain and repair the public infrastructure we depend on.	B	Thank you, your comment is noted.
33.	09/10/12 email	I have used the Suiattle R. Road to road end about 50 times for hiking purposes and I would like to see the road rebuilt to road end. If that is NOT possible I would like a trail built to the original road end that is motorcycle accessible.	B	Thank you, your comment is noted.
34.	09/10/12 email	I am a equestrian rider in this state and would really appreciate this road reopened. I ride the Pacific Crest Trail and seems a tragedy that with this sections of road out, is limits the access points the the PCT. I volunteer many hours to trail work and restoration through my affiliation with Backcountry Horsemen of WA. Please designate funding for repair. BCHWA would like to assist the forest maintenance of the trails in this area. In order to do this, we must be able to access the trail heads beyond this damaged area of road.	B/C	Thank you, your comment is noted.
		attached please find comments from the North Cascades Conservation Council on the amended Environmental Assessment for the Suiattle river road	Modified C	Response 1: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AE), Appendix E – Response to Comments (p. E-193 Response 1). Response 1: In addition to that response, the agency adds the following response: Alternative C is fully developed in that it considers the impact of constructing the road to MP 19 and the impacts beyond MP 19 of that decision. Selection of Alternative C would not foreseeable any trail or other use of the remainder of the road by the land managing agency.
		In our comments on the march 2012 FHWA Suiattle EA we made, in effect, four main criticisms, as well as making a number		10 September 2012

Date of Comment	Comment	Action Item and/or Response
	Comment Summary and/or Alternative Preferred ABC	
	<p>of recommendations and asking some questions. Since the proposed action in the amended August EA has, so far as we can tell, not changed at all from the original EA, it stands to reason that we have the exact same criticisms and suggestions laid out in the comments on the March EA. Consequently we will repeat these criticisms and suggestions verbatim by appending the text of our original comment letter to these comments. But since the FHWA has attempted to rebut our observations and criticisms in appendix E of the amended EA, we will spend a little time responding to what has been said, and not said, in this appendix E.</p> <p>Comment 1: Our first criticism of the original EA was that Alternative C was not a fully developed alternative, leaving unaddressed a number of obvious problems and further actions which would be necessary to make Alternative C genuinely attractive, leaving a strait-man opinion are not the sort of things that ERFO can be expected to pay for, and/or are property under the jurisdiction of the US Forest Service.</p> <p>Comment 2: However, the preferred alternative B in fact includes actions which are also very beyond the scope of ERFO, notably the replacement of the entire Downey Creek causeway with a multi-span automobile bridge. In fact (although it is nowhere directly stated) the expectation is that these non-ERFO portions of alternative B will be paid for by external grant money.</p> <p>Comment 3: All we are asking is that alternative C receive the same sort of treatment. As for the second point, the assertion that this is all Forest Service responsibility and hence no business of the FHWA as lead agency, we pointed out in our original letter that 40 C.F.R. 1502.14(c) directs preparing agencies to "include reasonable alternatives not within the jurisdiction of the lead agency."</p> <p>Alternative C as described is in fact not a "reasonable alternative", and if unfunded actions not within the jurisdiction of the FHWA are required to make it reasonable, so be it. Comment 4: Our second criticism concerned Raritan Reservoir and ACS criteria. The EA acknowledges the proposed destruction of .67 acres of wetland. It is our contention that road conditions for wetlands be avoided entirely. Comment 5: Alternative routes exist at both MP 6 and MP 13.4 which entirely avoid wetlands.</p> <p>Comment 6: Regarding our third principal criticism, of the MP 20.8 repairs, we continue to believe that a scientific controversy exists and that you were in fact defeat in not disclosing the risks of fandisides mentioned not only in the SK Geotechnical report, but in the subsequent interim analysis by a USFS geomorphologist. It is not enough to merely put these documents on the project list of references without hint that they raise potentially important questions about the prudence of the repair strategy outlined in reference B.</p> <p>Inadequate Development of Alternatives</p> <p>Comment 7: The FHWA has not adequately developed alternatives to the full-rebuild "B" option. The partial rebuild "C" option as presented is, as explicitly stated, effectively a "no action" alternative for the road past MP 19.0. It leaves undone a number of actions which are essential for resource protection and essential to making a partial rebuild option attractive to recreationists. In particular: 1) no end-of-driving parking facilities would be provided near MP 19; 2) no plan is presented for decommissioning or treating the closed portion of the road to forest fuel problems from unmanaged culverts, or to remove the causeway across the Downey Creek alluvial fan. 3) no trail conversion is proposed to ensure that nonmotorized users can continue to transit the road corridor with ease. Aside from Downey and Sulphur creeks, crossing would, however, require some kind of bridge extension to permit all classes of non-motorized users to reach the current bridge span were the Downey creek causeway to be removed.</p> <p>The EA states (p.27) that a more thoroughgoing formal decommissioning option for road beyond MP 19 was not pursued because "a decision to convert a road to trail is a decision that would be deferred to the USFS who has the authority to determine such access and travel management changes on their road system". However, 40 C.F.R. 1502.14(c) directs preparing agencies to "include reasonable alternatives not within the jurisdiction of the lead agency." In not presenting a more thorough partial decommissioning option, the FHWA has failed to meet this standard.</p> <p>Comment 8: The preparers go on to argue against partial decommissioning on the grounds that it "would not be consistent with forest plan direction for the Suatelle road (p.27)". In fact this "direction" in the 22-year-old 1990 land and resource management plan, is nothing but an enumeration of all national forest system roads with their current and anticipated future status: (MBSNF land and resource management plan, pp.4-72 to 4-79). Comment 9: Many things have changed greatly since 1990, most notably the increasingly penurious fiscal environment of the national forest road system, and the 1994 ROD ("Northwest Forest Plan") which modified forest plans throughout the region, requiring much greater emphasis on resource protection than hitherto. Many roads on that 1990 forest plan list have since been closed or decommissioned, including a number in close proximity to FS 26, some of them trail roads. In the Suatelle valley road FS 25, the main trunk south side Suatelle road, has been decommissioned back six miles since 1990; several tributary roads such as the six-mile long lime creek road (FS 25b) have been decommissioned in their entirety. Most recently FS 23, the trunk road in the adjacent Whitechuck River valley, was decommissioned and converted to trail for its final 1.5 miles, despite having a campground and a major trailhead at its terminus. Comment 10: It is notable that the decisions to partially decommission FS 25 and FS 23 were both preceded by significant storm damage which effectively closed them to motor vehicle traffic. We conclude that this "is in the forest plan" argument against decommissioning is entirely specious context, such as is provided by the current EA process.</p> <p>Comment 11: The preparers also argue against a partial decommissioning option on the grounds that it would permanently eliminate motor vehicle access to the Sulphur creek camp ground. However, this option would restore motorized access to the Buck Creek campground at around MP 15, which was always much more popular than Sulphur creek when both were motor-accessible. Table 4 of the EA(p.60) reveals that Buck Creek consistently drew more than 2.5 times the annual user-days that</p>	<p>Alternative C was included for the precise reason of looking at the effects of such an alternative and to provide the decision maker with a choice in making decisions within the authority of FHWA. There is no other alternative that would be within the jurisdiction of another Federal agency, that would meaningfully address the purpose and need of the project. The argument that Alternative C should be more fully developed to include a parking lot and trail on that portion of the road about MP 19 is an argument about detail within an Alternative, it is not an argument that there is a reasonable alternative that the agency failed to consider. Alternative C leaves open the ability of the Forest Service to manage the last 4 miles of Road 26 in a road-on-trail option, and in no way restricts that ability. Accordingly, there is no advantage to the decision making process to add this additional detail to Alternative C.</p> <p>Alternative C is an alternative limiting FHWA's ERFO funded activities on the road. A selection of Alternative C would not bind the Forest Service to close permanently the road at MP 19 nor constitute a departure from the USFS February 2, 2012 Decision Notice and Finding of No Significant Impact for the Suatelle Access and Travel management Project.</p> <p>Response 2: The EA on page 22 under Section 1.9, Tribal Consultation, describes USFS coordination with the Upper Skagit Indian and the Sault-Suatelle Indian Tribes on repair design for Downey Creek Bridge. "The result of tribal consultation was the development of a Salmon Recovery Funding Board (SRFB) proposal sponsored by the Skagit River System Cooperative representing the Sault-Suatelle and Swinomish Indian Tribes for the extension of the Downey Creek Bridge and the removal of bridge approach fill and culvert in the floodplain. This SRFB grant was selected in 2011 for funding so there are resources available for the bridge extension and restoration of the riparian area at Downey Creek. Therefore, the Downey Creek Bridge extension would not be funded by ERFO.</p> <p>Response 3: Alternative C is a reasonable alternative as discussed above in Response 1 from the Amended EA (EA), Appendix E – Response to Comments (p. E-193 Response 1).</p> <p>Response 4: The proposed repairs on Road 26 from MP 6.0 to MP 22.9 are approximately 2 miles of relocation over 17 miles of existing road, which is a small portion of the existing road. The EA on page 37 describes the efforts to minimize impacts to wetlands.</p> <p>Response 5: Alternative routes at MP 6.0 and MP 13.4 were reviewed as described in the EA, starting on page 25. Section 2.1 – <i>Alternatives Considered but Eliminated from Detailed Study</i>.</p> <p>Response 6: This comment is a repeat of a comment made by commenter 369 and is addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-196, Response 11).</p> <p>Response 7: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-195 Response 6). This comment is a repeat of comment one above and so response number one above will suffice as the response to this comment.</p> <p>Response 8: Forest direction on Road 26 is provided by the recent Decision Notice (DN) and Finding of No Finding of No Significant Impact (FONSI) for the Suatelle Access and Travel Management (ATM) Project. See responses 4 and 6 in the Amended EA (EA), Appendix E – Response to Comments (p. E-194 to E-196).</p> <p>Response 9: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-194 Response 3).</p> <p>Response 10: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-194 to E-196 in Responses 3, 4 and 6).</p> <p>Response 11: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-195 in Response 5).</p>

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	<p>Sulphur Creek did. A permanent MP 19 automotive closure would make Sulphur creek a walk-in campground with a moderate level four-mile hiking approach. Experiences with formerly automotive campgrounds on the Dosewallips road (Elkhorn, 1.5 mi.; Muscot flats, .5 mi.) suggests that it would add to the "spectrum of recreation opportunities" by offering a new sort of easy backcountry camping experience. A loss of motorized camping spots could be made up by renovating the former east-side Buck Creek campground, now used for unmonitored "dispersed" motorized camping.</p> <p>Comment 12: Preparers further argue against developing a partial decommissioning option on the grounds that it would require a new trailhead parking lot. Of course it would; we fail to see why this is an argument against fully developing the option.</p> <p>Comment 13: Preparers also argue against decommissioning beyond MP 19, because it would remove the Downey creek causeway, and so cut off non-authorized user access to the existing Downey Creek bridge span, forcing them to ford Downey Creek. Hence "Access to four trailheads and Sulphur Creek Campground would be lost" (p.27). This is an absurd argument; any sensible decommissioning alternative would also include a re-establishment of means of access to the Downey Creek span for non-motorized users traveling the former road. We are confident that the preparing agencies' bridge engineers and trail designers could think of something, and that furthermore such a pedestrian/equestrian/bridge extension would be considerably less costly than alternative B's \$1 million price tag for an automotive bridge at the same site.</p> <p>Riparian reserves and Aquatic Conservation Strategy (ACS) issues</p> <p>Comment 14: After it leaves the old road prism, about a half mile from its departure from FS 26, the proposed one-mile re-route between MP 12.7-13.6 (sites #3 and #4 in EA terminology) crosses two perennial streams and traverses a wetland. The EA acknowledges that the "approximately 66 acres of wetlands" would be affected under Alternative B. We believe that the entirety of this .66 acres is in the wetland just alluded to. Center-line stakes about 15 feet from the second perennial stream imply that there would be not just stream crossing, but considerable stream displacement at the second stream crossing (about MP 13.5).</p> <p>Allowing a 200-foot site potential free height and assuming that both perennial streams are not fish-bearing, the riparian reserves would cover roughly 800 feet of the .640 feet of proposed entirely new road alignment, and about 600 of the roughly 1,760 feet of this which is through late-successional forest.</p> <p>Standards and guidelines for Riparian Reserves from the 1994 ROD (hence "Northwest Forest Plan" or NWFP), include RF-2(g), which directs managers to meet ACS objectives by "minimizing disruption of new roads," and RF-2(f), to meet ACS objectives by "minimizing disruption of natural hydrologic flow paths, including diversion of streamflow and interception of surface and subsurface flow."</p> <p>Neither Alt B nor Alt C (which are identical in their effects below MP 19) meet the plain intent of these standards and guidelines. The proposal instead is to create artificial mitigation wetlands at several sites along the former road alignment (EA, p. 117). But the NWFP makes no provision for the creation of artificial compensatory wetlands in road construction projects; instead it fully prohibits the destruction of existing wetlands in the course of road construction.</p> <p>MP 20 Problems</p> <p>Comment 15: A scientific controversy exists regarding the proposed repairs at MP 20.8. At MP 20.8, a short distance before the Downey Creek crossing, the river encroached into the roadway at the base of a steep, forested hundred-foot high bank, taking most of the road prism. At present the low-water channel of the Sintulat river has retreated south, away from the base of the slope, and at summer and fall flows the river channel adjacent to the base of the slope is in fact occupied wholly by the flow of Downey creek. This floodplain reach of Downey creek is of great importance to the Sintulat river stock of the listed Puget Sound chinook. In recent years WDFW redd surveys indicate that approximately 40% of the Sintulat's chinook population has spawned in this one short clear-water reach, immediately adjacent to the washout and to the remnants of the road prism (see picture 1 below). A 2009 analysis of the site by SK Geotechnical, Inc. commissioned by the Forest Service, concluded that the slope above the road prism had a history of failure, was potentially unstable, and that digging into the slope to move the roadway into the bank was ill-advised:</p> <p style="padding-left: 2em;">It is ... our opinion that ... shifting the road 15 feet into the slope is not suitable and will likely activate the entire slope to fail almost immediately and perhaps during construction. This failure would result in significant additional soil loss and sediment being introduced into the river. (SK Geotechnical report, p.16)</p> <p>Such a sediment-delivering failure would of course pose a significant risk to the road-adjacent spawning reach. Under most circumstances such a technical finding would discourage any repair strategy involving digging into the bank, however, because of very limited repair options at this site. MBSNF and FHWA staff instead set to work re-analyzing the slope and the accumulated data and concluded that the original findings of instability had been based on excessively conservative assumptions. "We disagree with the SK Geotechnical conclusion that the hillside above the road is an active landslide. The SK Geotechnical recommendation to not shift the road alignment into the hill is more restrictive and conservative than necessary" (Memo by FHWA engineer Jose Linares, file code 7170-2)</p>	<p>Response 12:— see response to commenter 369 addressed in the Amended EA (AEA), Appendix E—Response to Comments (p. E-194 to E-195 in Response 5).</p> <p>Response 13: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-195 to E-196 in Response 6).</p> <p>Response 14: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-196 in Responses 7 to 10).</p> <p>Response 15: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-196 to 197 in Response 11).</p>	

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	<p>Picture 1: site of MP 20 8 washout and adjacent spawning reach of Donney Creek</p>  <p>Comment 16: Without going into the technical details, it is nonetheless clear that conclusions regarding stability are very sensitive to input parametric assumptions, in particular the assumed angle of internal friction, phi. The "revisit" of this phi assumption by FHWA and FS staff resulted in a conclusion that the slope was marginally stable enough to tolerate the proposed repair without failure, although they acknowledge some increased risk of failure. The low safety factors indicate that some risk is involved. Shallow sliding, slough removal, high road maintenance costs, and long-term-slope adjustment factors should be anticipated" (analysis memo by Bill Sheinleiner, Olympic NF, titled "Slope stability assessment FSR 26 MP 20 8" dated 11/23/2011). The proposed repair involves moving the road 10-15 feet into the bank, and steepening the lower 40' of bank slope up to 45 degrees, from its current low 30's, without armoring or supporting the slope above the road in any way. This would of course entail stripping the lower half of its vegetation and tree cover.</p> <p>Comment 17: Modeling assumptions aside, there seems ample physical evidence of past instability on this slope. Picture 2 below depicts a downed log across this slope completely buried on its uphill side by mass wasting. 1944 aerial photographs show this slope as bare, and in fact although it is now forested, the canopy trees are relatively young, and appear to belong to a single cohort which successfully colonized the site following the last significant slope movement. No stumps are visible on the slope, and the statement by FHWA engineer Jose Linares that the bare slope visible in 1944 was due to clear-cut logging (memo dated october 19 (2010) file code 7170-2) is not supported by physical evidence. By contrast the forest on the bench above is obviously older, and also obviously retains visible stumps from a round of light selective logging (see photo 3). It is a safe assumption that the present root structure on this slope now contributes significantly to its recent relative stability.</p> <p>Comment 18: In this context significantly steepening the lower half of this hundred-foot slope and striping it of its protective vegetation is obviously risky, and does not seem to obey common-sense standards of prudence in either engineering or resource protection. If this proposed repair is executed the continued close proximity of the road prism to the river channel on the outside of a bend also renders it acutely vulnerable to flood damage. Planning and executing a repair with such a high and evident risk of failure is not sensible, not fiscally prudent, not consistent with engineering best practices, and puts listed fish stocks at risk.</p> <p>Comment 19: NEPA has two primary goals: (1) to insure that the agency has fully contemplated the environmental effects of its action, and (2) to insure the public has sufficient information to challenge the agency. Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1151 (9th Cir. 1998); see also, Price Road Neighborhood Ass'n v. U.S. Dep't of Transp., 113 F.3d 1505, 1511 (9th Cir. 1997) ("One of the twin aims of NEPA is to give the public involvement and access to information."); Columbia Basin Land Preservation v. Schlesinger, 645 F.2d 585, 592 (9th Cir. 1981) ("the preparation of a NEPA document ensures that the public 'can evaluate the environmental consequences independently.' NEPA 'guarantees that the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision.'") Robertison v. Methow Valley Citizens, 490 U.S. 332, 349, 109 S.Ct. 1835 (1989). Specifically, NEPA places on the Forest Service an affirmative duty to disclose and analyze scientific information counseling against the action proposed by the agency or calling into question the expected environmental effects of a proposed action. 40 C.F.R. §§ 1502.9(a), 1502.24. See also, 40 C.F.R. § 1508.27(b)(4).</p> <p>The Ninth Circuit has repeatedly confirmed that NEPA does not allow an agency to simply disregard contrary science that is directly applicable to its proposal. Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208 (9th Cir. 1998); Center for Biological Diversity v. U.S. Forest Serv., 349 F.3d 1157, 1169 (9th Cir. 2003); Seattle Audubon Society v. Lyons, 871 F. Supp. 1291, 1318 (W.D. Wash. 1994), aff'd sub nom., Seattle Audubon Society v. Mosely, 801 F.3d 1401 (9th Cir. 1996) (NEPA requires the agency to "disclose responsible scientific opinion in opposition to the proposed action, and make a good faith, reasoned response to it"); Seattle Audubon Society v. Espy, 998 F.2d 699 (9th Cir. 1993) (the failure to disclose and respond to the opinions held by well-respected scientists concerning the hazards of a proposed action "is fatally deficient"); Silva v. Lynn, 482 F.2d 1282, 1285 (1st Cir. 1973) ("[NEPA] helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug."). The courts have also been clear that the only appropriate place to disclose and discuss a scientific controversy is in the body of the NEPA document itself. Blackwood, 161 F.3d at 1214 (invalidating an environmental document that "contains virtually no references to any material in support of or in opposition to its conclusions."</p> <p>That is where the Forest Service's defense of its position must be found").</p> <p>Picture 2: buried log at MP 20 8</p> <p>Picture 3: evidence of partial logging in old bench forest above MP 20 8 slope</p>	<p>Response 16: – See Response 11. AEA, Appendix E, p. E-196-197.</p> <p>Response 17: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-197 to 198 in Response 12).</p> <p>Response 18: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-196 to 198 in Responses 11 and 12).</p> <p>Response 19: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-200 to 201 in Responses 12(c,d)).</p>	

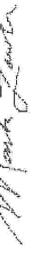
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	<p>Comment 20: Here a significant scientific controversy exists about the validity, integrity, and longevity of the proposed repairs to the Suttle River Road at MP 20.8. Geotechnical reports prepared by third party contractors SK Geotechnical and Herrera Associates suggest that FHWA's proposed design for the road repairs are inadequate and that the Suttle River Road is likely to fail again in the near future, despite – or even because of – the proposed repairs. Indeed, internal Forest Service documents also disclose the instability of the current and proposed road alignment and repairs, and indicates that they are likely to fail again in the future. The EA fails to discuss his information and provide a reasoned explanation for why FHWA and the USFS have chosen design plans and mitigation measures that are unlikely to remain stable.</p> <p>Loss of Old Forest and Critical Habitat</p> <p>Comment 21: How much old forest (critical habitat for both the Northern Spotted Owl and the Marbled Murrelet) will be felled for this project? 1.2 acres for the MP 12.2 washout (EA p.127), either 4 or 2.4 acres for the MP 12.7-13.6 washout (both figures are given on p. 127), and an acre at MP 14.4 has already been felled. This yields somewhere between 4.8 and 6.2 acres of 150-year-old forest lost in the course of this project. Whatever the figure, it is too much. Take the lowest figure given for the MP 12.7-13.6 washout, 2.6 acres. The old forest portion of this re-route is almost exactly a third of a mile. The loss of 2.6 acres of old forest in a third of a mile implies an average clear zone width of 64 feet. We believe the clear zone should not average over thirty to thirty-five feet for a road with a 14-foot running surface, on low-slope ground. Wherever possible there should be no inboard ditch line, but outslipping should be used instead. We have noticed that on the existing portions of FS 26, there are many instances of large-diameter trees within 6-8 feet of the road running surface. We believe the FHWA are using inappropriate design speeds and inappropriate design standards. A clear example of this is the plan to reduce curve radius and "cut the corner" at the downstream end of the MP 12.7-13.6 re-route where it departs from FS 26 onto the old spur. This loss of old forest in the corner is completely unnecessary. The current angle of departure of the spur from FS 26 is perfectly acceptable. At MP 12.2 (the first federal washout) the loss of 1.2 acres of old forest (and a rather steep route) can be obtained by keeping the road close to its pre-washout alignment. It appears that at this site the current alignment is partially on bedrock above OHWM, and this seems certain to impede any significant further movement of the river into the slope. If the bedrock is indeed above OHWM it may be feasible to build a steeper retaining wall based on the bedrock, allowing reconstruction of the road on the original alignment, or moved slightly into the slope. (This will avoid infringement on the normal river channel of the Suttle.)</p> <p>We suspect that the aggregate loss of old forest contemplated in the current alternatives (both alt C and alt B have the same effect) is greater than the amount acknowledged in previous consultations or BiOps with USFWS. We believe the loss of old forest can and should be reduced by more than half.</p> <p>Recommendations</p> <p>Comment 22: We support permanent closure of FS 26 at MP 19, as called for in alt C. Closure at MP 19 obviates the considerable problems and risks posed by MP 20.8 for full reconstruction. However, as noted above all C is an inadequately developed alternative, and we support also the construction of a trailhead parking lot in the vicinity of MP 19. We support the full decommissioning of FS 26 from MP 19 to the Downey Creek bridge, including the removal of the causeway across the alluvial fan and removal of all culverts from the road prism. We also support the reestablishment of pedestrian/equestrian access to the Downey creek span via bridge extension. Less expensive options for preserving nonmotorized access (e.g. only partial removal of the causeway; retaining a footing for the current hike-and-equestrian bridge) should also be evaluated. Past Downey creek there appear to be only two live culverts, one shallow and the other deeper. Approaches to treating these two culverts should be evaluated (e.g. deploying a temporary bridge to get a backhoe onto the Downey Creek span, using hand-operated power digging equipment to extract the culverts, no action). Downstream of MP 19 we advocate minimizing impacts to old forest by narrowing clear zones, by taking a different approach to the MP 12.6 re-route, and more generally using a lower design speed to make it possible to tolerate tighter radius curves, narrower shoulders, and more obstructed sight lines.</p> <p>Sincerely,</p> <p>Karl Forsgaard President North Cascades Conservation Council</p> <p>Please find attached a comment letter from a group of conservation and recreation organizations in support of Alternative B in the Suttle River Road Repair Amended Environmental Assessment.</p>	<p>Response 20: This comment is a repeat of the comment made by commenter 369 and is addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-201 to 202 in Responses 12c/d).</p> <p>Response 21: These comments are a repeat of the comments made by commenter 369 and are addressed in the Amended EA (EA), Appendix E – Response to Comments (p. E-201 to 202 in Responses 13).</p> <p>Response 22: comment noted</p>	B	Thank you, your comment is noted.

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		email	<p>Please do not hesitate to contact me if I can answer any questions or otherwise assist you in your endeavors.</p> <p>The Access Fund - The American Alpine Club - American Whitewater Evergreen Mountain Bike Alliance - The Mountaineers Washington Trails Association - Washington Wild - The Wilderness Society</p> <p>The undersigned organization commented on the March 18, 2012 Suatlie River Road Project Environmental Assessment. Many of our organizations also commented individually. We supported Alternative B, repaving the Suatlie Road to its terminus to ensure continued access to the Glacier Peak Wilderness. We have read the Amended EA released by Federal Highways on August 10, and wish to reassert our continued strong support for repaving the Suatlie Road and for Alternative B.</p> <p>We appreciate the work that Federal Highways and the Darrington Ranger District undertook to clarify elements of the original EA. Added detail on some repair segments, clarification included on the Suatlie classification as a level 3 road and information related to the compartment of alternatives with the Forest Plan make the EA a stronger document.</p> <p>The Suatlie Road is a vital recreational asset and we look forward to once again visiting the Glacier Peak Wilderness from the west side of the mountains. The Amended EA gives us no reason to change the substance of our April 19 comments.</p> <p>Please do not hesitate to contact us if we can answer any questions or provide further information. You may call Jonathan Guzzo at Washington Trails Association at 206.965.8558 or contact him by email at jonathan@wta.org.</p> <p>Sincerely,</p> <p>Jason Keith Senior Policy Advisor The Access Fund Leigh Goldberg Conservation and Advocacy Director The American Alpine Club Thomas O'Keefe, Ph.D. Pacific Northwest Stewardship Director The American Alpine Club Glenn Givens Executive Director Evergreen Mountain Bike Alliance Sarah Krieger Public Lands Program Manager The Mountaineers Jonathan Guzzo Advocacy Director Washington Trails Association Tom Unack Conservation Director Washington Wild Peter Dykstra Pacific Northwest Regional Director The Wilderness Society</p>	B	<p>Response 1: Commented Noted</p> <p>Response 2: A decision on the repair options considers purpose and need, issues, the environmental consequences and</p>
36.	09/10/12	email	<p>On behalf of the Sierra Club's 25,000 members in Washington State, I would like to provide comments on the above-referenced proposal. Many of our members use the Darrington Ranger District of the Mt. Baker-Snoqualmie National Forest and enjoy its pristine roadless areas. Wilderness areas, wild and scenic rivers, wildlife, fish, and extensive trail system. Sierra Club staff, volunteers, and members also engaged many years during the development of the land and resource management plan that governs the Mt. Baker-Snoqualmie NF, including the Northwest Forest Plan of 1994. The Suatlie road proposal has the potential to impact these interests of our members and the public.</p> <p>Comment 1: We'd also like to state categorically that the Sierra Club does not oppose the continued use of the Suatlie River Road for ongoing public access to numerous recreational facilities—we simply do not feel that the last two miles of this road warrant reconstruction for motor vehicle use, as described in our April 2012 comment letter (attached).</p> <p>Comment 2: We are extremely disappointed that FHWA has not taken to heart the strong public comments about this project and is</p>	B	38

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	<p>still bent on building Alternative B essentially as proposed in the original EA. We don't feel that the AEA has responded to any of our reasonable comments in our April 2012 letter.</p> <p>Comment 3: In particular, we don't understand why FHWA and the US Forest Service cannot end road maintenance at the Green Mountain Road junction and let the final couple miles be used for non-motorized recreation. Is two miles worth reconstructing at enormous cost and environmental damage, including to endangered chinook salmon, versus adding perhaps an hour to walk each way to access the Glacier Peak Wilderness? This type of minimal shortening of an access road has been done successfully elsewhere on the Mt. Baker-Snoqualmie NF.</p> <ul style="list-style-type: none"> • performed on the White Chuck River Road, also in the Darrington Ranger District, where road maintenance is no longer being performed on the final 4 miles of the original road bed, and it's being allowed to become a non-motorized trail • on the Middle Fork Snoqualmie River Road near North Bend, where the last few miles were closed, saving taxpayers millions of dollars in maintenance of a deteriorating road while still providing excellent access to many recreational facilities. <p>Comment 4: We're also extremely concerned that the AEA has not eliminated the new road construction in old growth forest in a Late Successional Reserve, as we requested in our April 2012 letter. Comment 5: We believe that with judicious design and engineering, nearly all of the original road alignment can be used. Comment 6: The AEA has not justified why the original road alignment isn't sufficient, and it also doesn't justify how the requirements of the Northwest Forest Plan will be met when its preferred alternative is to cut down hundreds of old growth trees to create a new road alignment. The Northwest Forest Plan requires that impacts to late-successional forests in LSRS be avoided whenever possible; this project does not do so.</p> <p>Comment 7: Related to the old growth issue, we oppose the commercial sale of trees cut for this project. Any cut trees should be used only for local stream enhancement projects on the Darrington Ranger District, or for local Forest Service-authorized recreational facilities such as foot bridges, barriers at parking lots, and so on.</p> <p>Please keep the undersigned on the mailing list for this proposal.</p>	<p>Comments. Public comment on this project has been very strong support for the repair of Road 26 to the terminus.</p> <p>Response 3: This comment is similar to a comment made by commenter 3(c) and is addressed in the Amended EA (AEA). Appendix E - Response to Comments (p. E-194 Response 3).</p> <p>Response 4: The road alignment will not go through LSR forest, as explained in the AEA in Appendix E - Response to Comments (p. E-154, Response 13).</p> <p>Response 5: The AEA, starting on page 25, Section 2.1 - Alternatives Considered but Eliminated from Detailed Study describes Alternative 1- Repair Forest Road 26 in Place.</p> <p>"The alternative would rebuild the road in the same location as in the past. Road fill material would be placed into the newly eroded river channel within the ordinary high water mark (OHW) of the Suiattle River. Riprap would be placed along the road fill and within the riverbed at MP 6.0, MP 12.6, MP 13.0, MP 13.4, MP 14.4 and MP 20.8. Implementing this alternative would require maintaining a road in a location vulnerable to future flood events and therefore would not meet the need to provide safe, passenger car and stock trailer access to the public for recreational opportunities in the Suiattle River drainage. This alternative was considered but eliminated from detailed study because.</p> <ul style="list-style-type: none"> • Reconstruction at MP 6.0, MP 12.6, MP 13.0, MP 13.4, MP 14.4 and MP 20.8 would require material (riprap, soil etc.) encroachment into the river or adjacent floodplain. The road would remain in a location susceptible to another flood event, and likely result in future failure of the road system. • Placement of fill within the ordinary high water mark at MP 6.0, MP 12.6, MP 13.0, MP 13.4, MP 14.4 and MP 20.8 would have adverse effects on the free-flowing characteristics of the Wild and Scenic River. This alternative would not support the Skagit Wild and Scenic River standards and guidelines. • Placement of fill within the ordinary high water mark at MP 6.0, MP 12.6, MP 13.0, MP 13.4, MP 14.4 and MP 20.8 would not promote the Aquatic Conservation Strategy objectives of the Forest Plan. • Placement of fill within the ordinary high water mark at MP 20.8 would fill in active Chinook spawning habitat in the vicinity of Downey Creek, and would be an adverse effect for a federally listed species. • Reconstruction of road at MP 6.0 in the previous location would be within the State defined channel migration zone of the Suiattle River and would not meet State regulations for road reconstruction involving a road easement across State lands. • Repair in place of the road approach to the Downey Creek Bridge would not remove fill from the current road that exists in the overflow channel of Downey Creek. The road fill would continue to restrict d channel processes in the floodplain." <p>Response 6: These comments are a repeat of the comments made by commenter 3(e) and are addressed in the Amended EA (AEA). Appendix E - Response to Comments (p. E-201 to 202 in Responses 13).</p> <p>Response 7: Commented noted. Page 32 of the AEA describes proposed use of felled trees as follows "Felled trees would be decked and used for administrative projects such as improved fish habitat, repairs, or to sell."</p> <p>This comment was submitted during the release of the EA in March 2012 and responses can be found in the A-EA under commenter number 376 (page E 222-E 225).</p>
37.	<p>09/10/12 email</p> <p>Washington State Chapter 3728 Woodlawn Ave. N. Seattle, WA 98103 April 20, 2012</p> <p>Attachment: Sierra Club April 20, 2012 comment letter</p>	

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	<p>On behalf of the Sierra Club's 25,000 members in Washington State, I would like to provide comments on the above-referenced proposal. Many of our members use the Darrington District and enjoy its pristine roadless areas, Wilderness areas, wild and scenic rivers, wildlife, fish, and extensive trail system. The proposal has the potential to impact these interests of our members and the public.</p> <p>This is one of the best opportunities the Forest Service will have to "right-size" much of the road system in the Suiattle basin while restoring recreational access to the upper Suiattle River and Glacier Peak Wilderness. The past high road mileage has contributed huge volumes of sediment and pollution to the watershed over many years, has fragmented native wildlife habitat, and has limited options for backcountry recreation. The Suiattle River Road washed out in 1990 and was repaired, but then washed out again in 2003 and 2006. The washouts will never end in the upper part of the basin unless the road system is pulled back to a reasonable size.</p> <p>Alternatives</p> <p>We oppose Alternative B as continuing much of the status quo before the roads were washed out. Under B, the road east of the Green Mt. turnout has a high probability of washing out again, and the Forest Service will have to spend yet more millions of taxpayer dollars to fix them again, without solving the real problems and addressing the real recreational, access, and environmental needs of the watershed. Future road washouts threaten endangered Chinook salmon runs on the Suiattle. Furthermore, the EA does not include a true range of alternatives as required under NEPA.</p> <p>We strongly support the closure of the Road 26 at the Green Mountain turnout (FS Road 2680), as proposed in Alternative C. Thank you for publishing this alternative in the EA. By closing Road 26 at the Road 2680 junction, there will be no need to construct an expensive and elaborate vehicle crossing of the shifting alluvial fan at Downey Creek, and the strong run of endangered Chinook Salmon in Downey Creek will be protected.</p> <p>There is much spectacular old growth forest along the road segment above the Green Mountain turnout that makes for a delightful walk, horse ride, bike ride, or backpack. The topography allows a good parking lot to be created near the Green Mountain turnout to provide for recreationists who want to use the upper river basin. Parking here would add less than 2 miles to climbers' access to the Downey Creek trail and the Pinnigan Traverse—a trivial amount of level walking on a week-long alpine traverse. Similarly, adding about 4 miles of flat walking to backpackers' hikes into the Glacier Peak Wilderness is not a big impact to most people, many of whom could take advantage of the existing Buck Creek Campground. In fact, the surrounding old growth forests along the road would be a draw unto themselves, expanding the land base available to backcountry non-motorized recreationists.</p> <p>We suggest that interpretive facilities be provided at this new trailhead to tell visitors about the dynamic nature of this river, watershed, and ecosystem. Furthermore, provisions should be made to turn the Buck Creek Campground into a walk-in campground accessible to hikers, bicyclists, and horse users. The parking lot, interpretive facilities, and campground provisions should all be added to Alternative C to make it a realistic, viable alternative that provides numerous benefits to the public while protecting forest and aquatic ecosystems.</p> <p>Prior to final decommissioning of the upper segment of Road 26, we strongly support doing whatever mechanical work is needed to stabilize roadbeds and fill slopes along the road upstream of the Green Mountain turnout. Such stabilization measures should be added to Alternative C and</p>		

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	<p>in a final decision notice.</p> <p>Old Growth Forests</p> <p>We strongly oppose the re-alignment of the Suiattle River Road in Alternatives B and C through pristine old growth forest upstream of Road 26 M.P. 12.6. The EA admits there would be removal of "eight acres of foraging and dispersal habitat" (p.127), four acres of which would be irreplacable old growth forest. The EA (e.g. pp. 58, 131) waves off the impacts to the Northern Spotted Owl and Marbled Murrelet as inconsequential, but there is no analysis disclosed in the EA to justify this claim, other than that consultation with U.S. Fish and Wildlife Service determined the project "may affect, not likely to adversely affect" spotted owl populations.</p> <p>Regardless of the opinions of USFWS, USFS, or WFLHD on a few specific endangered species, the Northwest Forest Plan has broad, landscape-scale goals of maintaining species viability, and therefore <i>prohibits</i> logging of late-successional habitat in Late-Successional Reserves, especially when viable alternatives are available. With careful engineering design, such as presented by Bill Lider in his comments, most of the present road alignment can still be used and damage to old growth forests can be minimized.</p> <p>We also remain opposed to "freeway-like" design standards used by the WFLHD, similar to the repair of the White Chuck Road No. 23 in 2011. These design standards of long radius curves for higher speed driving are extremely damaging to the environment, remove excessive number of old growth and mature trees, and are not sustainable given the USFS's limited maintenance budget. The proposed realignment tends to maximize impact to old growth forest and fractures potential Spotted Owl and Marbled Murrelet habitats; we support and echo the concerns of the Pilchuck Audubon Society in its comment letter. WFLHD's experience with the Middle Fork Snoqualmie Road shows that a much narrower clearing limit, using tighter radius curves mostly on the existing alignment, is acceptable on a project such as this and best protects the environment.</p> <p>We do not feel that the Northwest Forest Plan's requirements to protect late-successional forests and riparian areas have been met by the action alternatives presented in the EA. We also do not feel that the Forest Service and WFLHD can justify moving such long segments of the road away from their present alignment under the ERFO (Emergency Relief for Federally Owned Roads) betterment requirements when other, less costly and less environmentally damaging alternatives that keep the road largely in its current location are available.</p> <p>Wetland Impacts</p> <p>The EA should have provided detailed maps showing the wetlands impacted and the proposed mitigation. High value Class I and Class II wetland mitigation should be accomplished at a ratio of 5 new to 1 impacted by this project, in accordance with generally accepted best management practices of critical areas as used by Snohomish County and other municipalities.</p> <p>Many stream crossings are in suitable fish habitat as determined by the WFLHD consultants, yet culverts in these areas are not designed for fish passage. All streams with suitable fish habitat must have fish passable culverts installed in accordance with WAC 220-110 Hydraulic Code Rules and design requirements supplemented by Washington Department of Fish & Wildlife's <i>Design of Road Culverts for Fish Passage</i>, 2003 edition.</p> <p>Past Success</p> <p>We point to the closure of the Middle Fork Snoqualmie River Road (beyond Dingford Creek) as a great success story, where Forest Service staff made the wise decision to close the upper few miles of the road and turn it into a trail, despite the miles that were added to Wilderness access upstream.</p>		

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	The added miles of easily accessed lowland and roadless area trail opportunities have been a boon to recreation in the area. The Suiattle River Road segment that we recommend for closure in this letter can become a similar success story. Please keep the undersigned on the mailing list for this proposal.		
	 Mark Lawler National Forests Committee Chair Sierra Club Washington State Chapter Tel.: 206 632-1550 Email: mark.lawler@sierraclub.org		
38.	09/10/12 email	<p>I wish to encourage you to repair the Suiattle River road or FR #26 to its original length. I am an equestrian user who supports Alternative B. The shortened road alternative doesn't provide a safe situation for us to saddle or tie our horses to our trailers or to start on our trip as we are in a road and riding next to parked and moving cars, so a dangerous situation for us and the horses as well as the moving automobiles.</p> <p>If the trail is restored to its original length, it provides us with an all day trip to arrive at a safe camping area for horses. If the trail is extended, the destination will be two days. More horses will need to be brought along to provide food and containment materials for the added stay along the trail where no horse camp is available.</p> <p>Presently one trail is open for access to the PCT between Skykomish and Highway #20 from the West side of the mountains. The longer trail causes more difficulties for those trying to recreate along the PCT.</p>	B
39.	09/10/12 email	As a hiker since 1955 I strongly support Alternative B opening the road to its original end.	B
40.	09/12/12	<p>I have been going up and camping at Sulfur Creek and hiking up to Sulfur Spring and soaking our feet 40 years ago. I've hiked up Huckleberry trail and Downy Creek trail and up the Crest trail. My kids were small and we all liked hiking and fishing. We did this for many years, it was a favorite place to go, it was so nice to be in the old growth forest.</p> <p>I think the road should be fixed and maintained so other family's can enjoy it to. Im 71 years old and I would still like to camp and hike there and so would my grown kids.</p> <p>I think it should be fixed so it could be used in case of forest fires also.</p> <p>There would be so few trees taken to make a road around the washouts.</p> <p>I love the old growth forest.</p>	B
41.	09/10/12 email	I recommend that the road be repaired according to Alternative B. This repair method will give full access for everyone to the recreational sites of the upper Suiattle River.	B
42.	09/10/12 email	Please fix this road so people can enjoy what this forest has to offer	B/C
43.	09/10/12 email	My wife and I have been hiking the North Cascades for more than 40 years. We dearly miss the trails off the Suiattle River road. We strongly support Alternative B to open the road to milepost 23. Thank you for your consideration.	B
44.	09/10/12 email	My comments stand as sent in. The road needs to be open to Sulphur Creek Campground. We have lost 95% of our day hikes in the Darrington area. Very few small businesses in Darrington are open at this time. Tourism and Recreation do not support the local economy but it helps.	B/C

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45. 09/10/12 email	I support the repair and reopening of the Suiattle River Rd to milepost 23. I believe that is Alternative B.	B	Thank you, your comment is noted.
46. 09/10/12 email	<p>I have reviewed the August 2012 Amended Environmental Assessment (AEA) and I am again disappointed that the Western Federal Lands Highway Division (WFLHD) has for the most part, not addressed or ignored my significant comments regarding this project. There have been no substantive changes from the March 2012 EA. The current August 2012 AEA is not only incomplete but continues the inappropriate environmental and economic analysis from CE that resulted in the contract termination of illegal road construction in 2011 in order to avoid a Federal Court injunction for NEPA violations. Many changes are still required to meet minimum acceptability. The road design still includes "freeway-like" design elements such as excessive clearing limits, large radius curves and un-maintainable cut/fill banks that are inappropriate for a forest road dead-ending at a wilderness area. There is inadequate wetland mitigation, culverts are not designed for fish passage, and most egregiously, there are major violations of Federal Law. Title 23 United States Code, Sections 120 and 125 with the improper use of Emergency Relief for Federally Owned (ERFO) road funds in violation of Federal Law.</p> <p>WFLHD continues to wrongfully maintain that there are no "Bettlements" on this project and the slow and gradual failure at the MP 6 due to lack of maintenance that occurred months after the 2006 flood event still qualifies for ERFO funding. Indeed it will be almost 10 years out from the original 2003 flood event before a legitimate contract can be Awarded and WFLHD and the USFS have failed to show that they have treated this project as an emergency making it a priority over its other non-emergency work.</p> <p>All of my previous comments and declarations remain unchanged as a part of the project record and are attached to these comments. I offer the following comments specific to the August, 2012 AEA.</p> <p>Comment 1: AEA Page 1, Paragraph 4, Last Sentence. This sentence fails to convey the fact that WFLHD and the USFS egregiously violated NEPA and it was not only a concern, but a violation of law. Please change this sentence to read: "Three parties brought suit in Federal Court naming the WFLHD and USFS as violating NEPA for its use of the Categorical Exclusion process for the proposed repairs at MP 12.6 to MP 14.4. To avoid an adverse judgment in this suit, the WFLHD and USFS terminated its construction project in this area and commenced preparation of this EA."</p> <p>Comment 2: AEA Page 1, Last Paragraph, First Sentence. This statement is incorrect. The first sentence should indicate that the Contract must be Awarded within two years from the end of the fiscal year in which the disaster occurred. Second WFLHD typically grants time extensions without requesting adequate justification for said time extensions. Justification should include copies of employee time sheets, and a project schedule Gantt chart or equivalent critical path method (CPM) showing the project's critical path, what caused the delay, and why the project could not be completed within the statutory time frame in order to justify an ERFO time extension.</p> <p>Failure to dedicate sufficient staff or consultants to an emergency project or not making an emergency project a priority over non-emergency work are not grounds for an ERFO time extension. Information provided to date via my FOIA request show that the USFS and WFLHD never intended to complete any of the 2005 or 2006 flood washouts within the statutory time limit.</p> <p>Comment 3: AEA Page 1, Last Paragraph, next to last sentence. The AEA states that the FS was granted a time extension for the 2005 damaged site, however there is insufficient evidence that this time extension should ever have been granted as the project was already beyond its 2-year statutory time extension or that annual time extensions were properly applied for with supportive justification. As an appendix to the final E.A. include all documentation for annual time extensions for each ERFO damaged road section on the Suiattle River, year by year.</p> <p>Comment 4: AEA Page 2, First Paragraph, Last Sentence. The AEA notes that a time extension has been granted until 2013 or 10-years beyond the original disaster date. Clearly this work is no longer an emergency nor does it qualify for ERFO funding under the law regardless of what the reason is for the delay.</p> <p>Comment 5: AEA Page 2, Second Paragraph, Last Sentence. This statement does not apply to the Mile Post 6 failure that was an isolated, localized slope failure which was determined from documents provided by the USFS under a FOIA request. Even if the MP 6.0 failure was the result of the 2006 flood, it was the result of a slow, progressive movement that does not qualify for ERFO. (Emphasis Added)</p> <p>Comment 6: AEA Page 2, Next to Last Paragraph, Last Sentence. Remove this sentence referencing the Green Mountain Lookout.</p>	<p>Response 1: Comment noted. The sentence as written in the AEA (page 1, paragraph 4, last sentence) is correct.</p> <p>Response 2: The two year time period is regulatory, not statutory. The regulation requires the Division Engineer to evaluate the project if the project is not under construction by the end of the second fiscal year following the year of disaster. This was done. Disagreement may exist over what constitutes suitable justification, but given the fiscal year 2007 flood and the environmental issues that followed, the agency believes that appropriate justification was provided to Response 10.</p> <p>Response 3: Documentation on time extensions has previously been provided by the USFS and FHWA to this commenter in a response to a FOIA request and is included in the Project Record.</p> <p>Response 4: The repair work qualifies under 23 U.S.C. 125 as repair of a road that suffered serious damage as the result of a natural disaster over a wide area by a flood. This response to a disaster was explained in the Amended EA (AEA).</p> <p>Response 5: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA, Appendix E - Response to Comments (p. E-149, Response 6), in response to commenter 312.</p> <p>Response 6: Comment noted. The USFS is considering how best to comply with the court opinion on the rehabilitated Green Mountain Lookout.</p>	

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	<p>Green Mountain Fire Lookout. The USFS violated NEPA and the Wilderness Act by constructing a new lookout at the site of former lookout as documented by Federal Judge Coughenour's summary judgment order of March 27, 2012, Case 2:10-cv-01797-JCC. The USFS is now under Court Order to remove this illegal structure from the Glacier Peak Wilderness Area.</p> <p>Comment 7: AEA Page 5, Section 3.1, ADD: State that the road alignment from Mile Post 13.0 to 13.4 will be through mapped Late Successional Reserve (LSR) forest. The new road in this area will impact the surface and subsurface flow to the wetland down gradient from the road without mitigation. Discuss how this violates the MBSNF Forest Plan.</p> <p>Comment 8: AEA Page 6, Riparian Reserve Standards and Guidelines for Roads Management, RF-4: Please address the fact that none of the culverts in the current design are fish passable. As noted in my earlier comments and declarations, the Herrera Report indicated that many of the stream crossings are suitable fish habitat. In some cases, fish accesses to these streams have been obstructed by improper culverts on the old roadway that need to be replaced or removed.</p> <p>Comment 9: AEA Page 8, 1.4 Proposed Action, Scoped with Public and Tribes, First paragraph, Second Sentence. The AEA still does not address the mandatory ERFO requirement that Betterments such as moving the road uphill, must be economically justified. In all cases, the WFLHD has wrongfully claimed that there are no Betterments on this project and refused to provide the required economic analysis in violation of Federal Law. Please provide the cost/benefit economic analysis required by ERFO for moving the road up-slope, constructing new bridges where none existed prior to the disaster, upsizing culverts, etc.</p> <p>Comment 10: AEA Page 9, Site #1, Milenpost 6.0 (T32N, R12E, Section 18). First Sentence: This sentence is largely inaccurate and is misleading. Documents provided by the USFS's original reconnaissance of the localized slide in late February 2007, months after the original flood, identified groundwater as the mode of failure. Because this slide was attributable to the lack of proper maintenance it does not qualify for ERFO funding. Furthermore, the temporary road that was constructed in 2007 remains adequate for all road transportation. WFLHD has proposed a Betterment that relocates this section of road for nearly one-half mile and does not address the economic benefits of stabilizing the steep slope and constructing a much less costly alternative.</p> <p>Comment 11: AEA Page 9, Figure 2b. Provided the date that this photograph was taken as well as all other undated photographs in the final EA. This comment was made in my April 2012 comments, but ignored by WFLHD in the issuance of the August 2012 AEA. Time dates for all photos are critical to evaluating the merits of the ERFO claims for this project.</p> <p>Comment 12: AEA Page 11, Site #3, Milenpost 13 (T32N, R12E, Section 9). The first sentence references a log jam that does not exist. The photograph 11/08/2006 Figure 4 shows no such log jam. In my visits to this site, I have never observed any log jam that would constitute justification for the road relocation in this area and certainly the WFLHD has failed to do the required economic analysis to justify the expense to relocate this road. Please provide supporting evidence of the alleged log jam or remove this reference from the final EA.</p> <p>Comment 13: AEA Page 12, Figure 5. The photograph dated 10/08/2009 shows an administrative vehicle at MP 13.4 location. Again by revising this road to high clearance vehicles, and prohibiting RV, 5th wheel trailers, etc. this road could be opened to the public today, should the USFS choose to do so.</p> <p>Comment 14: AEA Page 13, Figure 6. The undated photograph shows recent bulldozer work immediately adjacent to the Suiattle River with no erosion or sediment controls whatsoever. This work was outside the clearing limits for the project that was terminated due to the 2011 lawsuit.</p> <p>Comment 15: AEA Page 14, Site #6, Milepost 20.8 (T32N, R12E, Section 14). Last Sentence. This area is extremely unstable and is therefore unsustainable. While the WFLHD and USFS relocated the road uphill in other areas, it does not do so here. The Suiattle Road should be decommissioned east of the Green Mountain road and the natural slope restored in this area.</p> <p>Comment 16: AEA Page 14, Figure 7. Provide the date for this photograph.</p> <p>Comment 17: AEA Page 15, Site #7, MP 20.9 Downey Creek Bridge (T32N, R12E, Section 14). The construction of a 210 foot bridge extension where no bridge existed before is clearly a betterment. If any</p>	<p>Response 7: The road alignment will not go through LSR forest, as explained in the AEA in Appendix E – Response to Comments (p. E-154; Response 13).</p> <p>The comment about the road re-alignment effects on wetlands is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-149; Response 17).</p> <p>Response 8: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-155; Response 16). The AEA notes on page 83 that realignment of Road 26 would remove culverts in the floodplain, therefore addressing any fish passage concerns within the old roadway.</p> <p>Response 9: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-151; Response 8 and Page E-243; Response 7).</p> <p>Response 10: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-151; Response 8).</p> <p>Response 11: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-148; Response 3).</p> <p>Response 12: The photograph of Figure 4 (site #3) is located below the referenced log jam that exists in the vicinity of Mile Post 13.2. The referenced log jam has directed the flows of the Suiattle River toward MP 13.0 where the road was eroded during the fiscal year 2007 high water event (see appendix D for map and photographs of the log jam)</p> <p>Response 13: This comment is similar to a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-218; Response 21b).</p> <p>Response 14: The date of the photo in Figure 6 was addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-148; Response 3). The bulldozer work in Figure 6 was an emergency response in the Fall of 2003 to temporarily open Road 26 for the removal of vehicles stranded after the 2003 flood event. See AEA, Appendix E – Response to Comments (E-239; Response 21).</p> <p>Response 15: This comment is similar to a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-148; Response 5).</p> <p>Response 16: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (AEA), Appendix E – Response to Comments (p. E-148; Response 3).</p> <p>Response 17: The A-EA on page 22 under Section 1.9, Tribal Consultation, describes USFS coordination with the Upper Skagit Tribe and the Suiattle Indian Tribe on repair design for the Downey Creek Bridge. The result of tribal</p>

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	<p>ERFO funds are used for the design or construction of this bridge; the betterment must be justified by a benefit/cost economic analysis which has not been prepared. Please provide this mandatory analysis for compliance with ERFO in the final EA.</p> <p><u>Comment 18:</u> AEA Page 15, Figure 8. Provide the date for this photograph as it is misleading as repairs have already been accomplished in this area outside of the EA documentation. Provide a current photograph showing the improvements that have already occurred in this area to allow the bridge to be used by hikers, equestrian users, mountain bikers, and administrative ORV's.</p> <p><u>Comment 19:</u> AEA Page 16, Site #8 MP 22.9 Sulphur Creek Bridge (T32N, R12E, Section 24). It is proposed to build a concrete retaining wall at this location. The concrete retaining wall constitutes a betterment that requires a BC economic analysis. Please include this in the final EA.</p> <p><u>Comment 20:</u> AEA Page 16, Figure 9. Include the date that this photograph was taken as well as a current photograph showing the existing condition of this bridge.</p> <p><u>Comment 21:</u> AEA Page 31, Site #1, Milepost 6.0 (T32N, R10E, Section 18). Note that all work on State land must be designed in accordance with the Washington State Dept. of Ecology's <i>Stormwater Management Manual for Western Washington</i>, 2005 or most current edition. Also, work in this area requires the Department of Ecology pursuant to the NPDES permit requirements of the Clean Water Act.</p> <p><u>Comment 22:</u> AEA Page 22, Site #3, Milepost 13 (T32N, R11E, Section 9) and Site #4, Milepost 13.4 (T32N, R11E, Section 10). Third to the last Sentence. This section states that selling timber harvested for road construction is allowed. Timber cut for this road should be used locally to offset the environmental damage caused by this road project and for stream enhancement projects only.</p> <p><u>Comment 23:</u> AEA Page 41, Table 2, Second Row. Describe specifically what type of wastewater will be generated by this project. Is this sanitary waste water? How will this water be treated? Is there gravity flow or will it be pumped?</p> <p><u>Comment 24:</u> AEA Page 47, Table 2, 4th Row. There is no such thing a weed free straw. Certifications for weed free straw are meaningless and are not guaranteed. Use only intrinsically weed free products for erosion and sediment control such as wood straw or commercially prepared compost that has been sufficiently heated to kill all seed germs.</p> <p><u>Comment 25:</u> AEA Page 47, Table 2, Last Row. Use hand methods for weed control before using chemical herbicides.</p> <p><u>Comment 26:</u> AEA Page 60, 3.3.2 Alternative B. It suggested that Alternative B would "protect and enhance the free-flowing condition, water quality, and outstandingly remarkable values of the Suttle River." This appears to be false reasoning as the Suttle River would be in a better condition if the road were not constructed. Please remove this erroneous statement.</p> <p><u>Comment 27:</u> AEA Page 70, 3.5.3, Alternative C, Second Paragraph. The WFLHD gives short shrift to constructing a parking lot at or near the Green Mountain Road suggested termination point under Alt. C. While it is likely that a parking lot could be constructed near the junction of the Suttle and Green Mountain Roads, there is certainly adequate space in the Green Mountain Meadows area just ½ mile away. Failure to seriously consider parking and road termination at this point is simply spiteful on the USFS's part and only reinforces the skepticism that this EA is not truly objective. The Suttle ATM should be revised to indicate that the unsustainable road east of the Green Mountain Road intersection that should be decommissioned.</p> <p><u>Comment 28:</u> AEA Page 89, Forest Plan Consistency, First Sentence. This statement is incorrect. The alternatives are not consistent with the MBS Forest Plan as it requires the logging of old growth trees.</p> <p><u>Comment 29:</u> AEA Page 134, 3.11.2 Marbled Murrelet and Murrelet Critical Habitat. There have been no murrelet surveys in the last 10 years in this area. Therefore the EA is incomplete because the impacts to murrelets have not been properly identified or loss of potential or future habitat mitigated.</p> <p><u>Comment 30:</u> Appendix E, Page E-150 to E-151. It is not speculative that the quote from the Herold specifically addressed MP 6, as it did. The WFLHD did not bother to contact me to clarify this comment nor did it do an adequate job of researching the referenced article from April 20.</p>	<p>consultations was the development of a Salmon Recovery Funding Board Fund (SRFB) proposal sponsored by the Skagit River System Cooperative (representing the Sinki-Suttle and Swinomish Indian Tribes) for the extension of the Downey Creek Bridge and the removal of bridge approach fill and culvert in the floodplain. This SRFB grant was selected in 2011 for funding so there are resources available for the bridge extension and restoration of the riparian area at Downey Creek."</p> <p>Response 18: This comment requesting a date for the photograph is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-148, Response 3). A temporary foot Pacific Crest Trail located in the upper Suttle river drainage. This temporary foot access does not change the extent of flood damage to the Downey Creek Bridge approach or the vehicle access issues from Downey Creek to the terminus of road 26.</p> <p>Response 19: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-151, Response 8 and Page E-243, Response 3).</p> <p>Response 20: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-148, Response 3).</p> <p>Response 21: This comment is similar to a comment made by commenter 312 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-150, Responses 26a and 28).</p> <p>Response 22: Page 32 of the AEA describes proposed use of felled trees as follows: "Felled trees would be decked and used for administrative projects such as improved fish habitat, repairs, or to sell." An NPDES permit will be acquired as needed.</p> <p>Response 23: This comment is similar to a comment made by commenter 312 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-150, Responses 26a and 28). An NPDES permit will be acquired as needed.</p> <p>Response 24: comment noted</p> <p>Response 25: comment noted</p> <p>Response 26: This comment is similar to a comment made by commenter 370 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-216 and E-217, Responses 18a and 18b).</p> <p>Response 27: This comment is similar to a comment made by commenter 369 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-193 Response 1). This comment is similar to the comment #1 raised by commenter #34 above and is addressed with response # 1. The revision of the US Forest Service Suttle ATM is outside the scope of this analysis and decision document.</p> <p>Response 28: There is no logging with the project. Page 32 of the AEA describes proposed use of felled trees as follows: "Felled trees would be decked and used for administrative projects such as improved fish habitat, repairs, or to sell."</p> <p>Response 29: This comment is similar to a comment made by commenter 370 and is addressed in the Amended EA (A-EA), Appendix E – Response to Comments (p. E-210 Responses 5a and 5b).</p> <p>Response 30: Comment noted</p> <p>Response 31: This comment is a repeat of a comment made by commenter 312 and is addressed in the Amended EA</p>	

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	<p>2007 as referenced in my comments. I was able to locate it easily by using the Herald's search engine with only the date and the word "Sunattle." Attached is a copy of the article for inclusion with my comments on the EA and AEA.</p> <p>Please include this article in the final EA.</p> <p><u>Comment 31:</u> Appendix E, Page E-151. WFLHD has taken a position that there are no betterments on this project whatsoever. This is simply incorrect and it is a violation of Federal law to proceed with this project a leisurely, after-the-fact timeline does not show that this work was made a priority over the USFS' and WFLHD's other non-emergency work or that the USFS and WFLHD ever intended to Award this project within ERFO statutory time limits. Staff time sheets, project schedules, etc. must be provided to show that this work was diligently executed as required by Federal law.</p> <p><u>Comment 32:</u> Appendix E, Page E-158. Response 23 does not respond to my comment. Providing information provided to date simply does not show that this project was made a priority over other non-emergency work or that the USFS and WFLHD ever intended to Award this project within the ERFO statutory time limits. Staff time sheets, project schedules, etc. must be provided to show that this work was diligently executed as required by Federal law.</p> <p><u>Comment 33:</u> Appendix E, Page E-158. Response 25 is simply incorrect. There were LSR trees felled in this area which can be documented by photographs of stump and log diameters of the trees that were cut down or simply by inspecting the down logs that are still on the site.</p> <p><u>Comment 34:</u> The Herald Article Dated August 20, 2012. Attached is an article from The Everett Herald dated August 20, 2012, in which an official spokesperson from WFLHD was quoted as indicating that they were taking "votes" to determine the preferred alternative for the project. This is extremely disturbing in that the implication here is that good scientific judgment and data can be supplanted by the number of "votes" submitted to make a decision on the selected alternative. Even though this has been denied in email correspondence to me by WFLHD, the damage has been done by the WFLHD's careless use of the term "vote". If voting were to be done, would it be registered voters in local, state or federal elections? I requested that a retraction be printed to this article and to my knowledge this has not been done. Therefore, to repair the damage that has been done by planning this false impression in the public's mind, the WFLHD should take out a full page advertisement in the A-section of the Sunday edition of The Herald explaining the false information disseminated by WFLHD so that the public is fully informed between the differences between submitting comments and "voting" on a preferred alternative in the NEPA process.</p> <p>In conclusion, I hope that the WFLHD and USFS will take this opportunity to thoughtfully address these comments. I wish to avoid litigation on this issue, and I am willing to work with you to address the water quality, funding, and other issues implicated by the Sunattle Road repairs. However, failure to fully comply with federal law and to address the concerns I have raised may leave me, the public and other stakeholders with little recourse but through the federal courts.</p> <p>Respectfully submitted,</p> <p>LIDER ENGINEERING, PLLC</p> 	(AEA) Appendix E – Response to Comments (p. E-151, Response 8 and Page E-243, Response 7)	Response 32: Additional detail would not change. Response 23 provided in the AEA, Appendix E, Page E-158.
			<p><u>Response 33:</u> Trees were felled within the road alignment, which is within the Skagit Wild and Scenic River corridor, as explained in the AEA in Appendix E – Response to Comments (p. E-154, Response 13).</p> <p><u>Response 34:</u> Information gained from media interviews is presented in articles without agency staff review and represents the interpretation by media staff of the information they have gathered.</p>
47.	09/10/12 email	Please, please repair the sunattle river road. I support Alternate "B"	B
48.	09/09/12 email	This road if repaired will be the only access into the Glacier Peak Wilderness area from the west side of Cascades. Please repair to make this area available to use and to promote wilderness opportunities for generations to come.	B
	Our family vacations in the Pacific Northwest each summer for the last 15 years. The main reason we keep coming back is access to wilderness areas like Glacier Peak Wilderness. Before the heavy rains and slides on Sunattle River Road we would do a week long hiking trip into the Glacier		Thank you, your comment is noted.

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			wilderness each year. Now access is only from Trinity (Lake Wenatchee area) This access point is much too long for our kids. We would love to get access from Suiattle River road again. I support Alternative B, (WAFS ERFO 071-2023 Amended Environmental Assessment) which will repair the road to its end at milepost 23.0 giving our family road access again to the many hike in Glacier Wilderness.		
49.	09/9/12 email	I am a horseback rider who does a lot of trail riding all year round. When the snowpack allows, I head for the high country. Not having full access to the great trails and recreation opportunities from the west side into Glacier Peak wilderness has impacted me and my friends significantly. I agree with the requirement that we should pay user fees in the form of annual use pass, though in return I trust that the public lands will remain accessible to stock users. this includes reasonable road access to enable weekend rides for those of us on the wet side. The current situation requires an additional day or 2 to ride up the road making it unfeasible for a weekend ride. I do volunteer my time and efforts to trail maintenance on public lands, and will continue to do so. Please choose ALTERNATIVE "B" for the Suiattle River Road and restore access for vehicles with stock trailers to negotiate the full length of the road.	B	Thank you, your comment is noted.	
50.	09/9/12 email	My name is Mike Carmichael and I have been hiking Darrington/Marblemount area with my family for 30 years. We have been missing access to Suiattle River Road for several years now. This has really blocked off access to many beauty hikes in the Glacier Peak Wilderness. I have read the very detail report Suiattle River Road Project WAFS ERFO 071-2023 Amended Environmental Assessment with great interest. I support Alternative B, which will repair the road to its end at milepost 23.0 giving critical road access again to recreation use mainly hikers. This is one of the only access points to Glacier Peak Wilderness from the west and it would be a shame to not repair it.	B	Thank you, your comment is noted.	
51.	09/9/12 email	I support the rebuilding and opening of the Suiattle River Road.	B/C	Thank you, your comment is noted.	
52.	09/9/12 email	The Suiattle River Road is very important access for the more average person to get into a wonderful wilderness area so very close to the greater Seattle area. Access to wilderness and back home again all in a day - not certainly a weekend. This access helps create healthy people - by creating healthy bodies, healthy minds... and escape from city life (which we all need from time to time even if we don't all know it). It is also a very important connection to the <i>Suiattle River itself</i> . This is a raftable river, and Local small business that runs river trips down it for a month or so every summer. My business depends on access to this river. It is a very unique river trip that continues to help generate new customers for my business, and helps get the general public more connected to the great outdoors. This short piece of roadway is a very important roadway, please do re-open, re-build, and continue to maintain this access to many wonderful and needed wilderness recreational opportunities, including that of commercial (and recreational) whitewater rafting on the Suiattle River itself.	B/C	Thank you, your comment is noted.	
		Second email: Please re-open the Suiattle River Road.			
53.	09/9/12 email	I understand this is the place to comment on the EA for the proposed repair of the Suiattle River Road. I wish to add my voice in favor of the Suiattle Road's being repaired/reconstructed all the way to the end.	B	Thank you, your comment is noted.	
54.	09/9/12	I support reopening the Suiattle River Road, the alternative B. It would be so great to have access to	B	Thank you, your comment is noted.	

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55. 09/9/12 email	the trails in that area. Please vote for alternative B.	B	Thank you, your comment is noted.
56. 09/9/12 email	I support Alternative B, which will repair the road to its' end at Milepost 23.0.	B	Thank you, your comment is noted.
57. 09/9/12 email	For the record, in my capacity as president of the Darrington Area Business Association, Inc. (non-profit), and its division known as Friends for Public Use, my previous comment still stands in favor of Alternative B.	B	Thank you, your comment is noted.
58. 09/9/12 email	My previous comment in favor Alternative B still stands for the restoration of the Suiattle River Road.	B	Thank you, your comment is noted.
59. 09/9/12 email	I am writing in support of Alternative B. For years, what I believe to be some of the most beautiful country in the entire U.S. has been left largely inaccessible to hordes of hikers coming of age here in the northwest. Since knowledge of wild places is necessary to preserve and protect them, I believe that access to these lands should be resumed.	B	Thank you, your comment is noted.
60. 09/9/12 email	I fully support reopening the Suiattle River Road. We must not lose our ability to enjoy public lands in Washington because of maintenance and groups interfering with maintenance of our infrastructure.	B/C	Thank you, your comment is noted.
61. 09/9/12 email	I fully support the rebuilding of the Suiattle River Road #26.	B/C	Thank you, your comment is noted.
	I have reviewed the revised environmental assessment for the Suiattle River, and am still in favor of Alternative B (repair to the end of the road). My original letter is included below, and I believe my comments therein are still valid.	B	Thank you, your comment is noted.
	I am writing in support of Alternative B for the Suiattle River Road. I believe this road should be repaired to the Suiattle Trailhead.		
	The Suiattle River Access and Travel Management Plan (ATM) ROD states that 74 miles of road will be no longer available to the public for pleasure-driving, dispersed camping, berry picking, picnicking. I recognize the high cost of maintenance does not warrant keeping all of them open, and many are no longer needed.		
	The Suiattle River Road and its access to 7 trailheads and 2 car-camp grounds, however, is critical for hikers, backpackers, climbers, family car camping, kayakers, equestrians, pleasure-drivers, hunters, berry pickers, photographers, mushroom pickers, fishermen and the simple enjoyment of being outdoors. The loss of the Suiattle River Road would also make trail and campground maintenance extremely difficult. Page 3 of the EA identifies the Suiattle River Road as a "high need road" by The 2003 Forest-wide Roads Analysis or recreation and purposes.		
	With the loss of the White Chuck Road and trail in 2003, and the loss of the Suiattle River road beyond its current closure at milepost 12, the North Fork Sauk trail is becoming over-used by equestrians, hunters, climbers and backpackers. The parking lot there is no longer sufficient, and the degradation of backcountry camps are testament to the impact of the closure of the Suiattle River Road. If the Suiattle River Road is not repaired, continued heavy use of the North Fork Sauk trail will degrade the wilderness experience that people hope to enjoy when they enter Glacier Peak Wilderness.		
	While Alternative C provides some access to two trailheads and one car campground, it does not include fixing the Downey Creek crossing. Alternative B does include this repair, which is good for fish (and the tribes like it).		
	On a more personal note, the Suiattle River Road has been closed for much of the time I've been hiking in western Washington. This has prevented me from accessing many spectacular dayhikes		

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62. 09/9/12 email	<p>and backpacking trips in an area I very much look forward to exploring in the future.</p> <p>I am writing in support of the repair of the Suiattle River Road to its endpoint at Milepost 23 (alternative B). I am an avid day hiker and backpacker and appreciated the access the road gave to several trails. Currently the Suiattle River trail is inaccessible to day hikers, and it is one of the longest pristine Northwest river walks available to children and older hikers because of its relative flatness. It is also low-elevation and therefore accessible for much of the year. I have been looking forward to walking on that trail again for several years. Second, because of the decommissioning of the White Chuck River trail, there is limited access to the PCT in the Glacier Peak area. This area of the PCT is one of the most beautiful in the state and it is now nearly impossible to access for those who are physically unable to walk dozens of challenging miles over several days. Allowing access to the Glacier Peak section of the PCT via the Suiattle River Road would allow more moderate backpackers to enjoy this tremendous area.</p> <p>I appreciate that resources are extremely limited and am grateful for your consideration of the perspective of those who would like to access this beautiful area in a relatively non-impacting way.</p>	B	Thank you, your comment is noted.
63. 09/9/12 email	<p>I'm writing to enter a comment on the proposed repair alternatives for the Suiattle River Road, Project Number: WA FS ERF0 071-2023.</p> <p>My own position is unequivocal: FS 26 should be reconstructed for common passenger vehicle access for its full length, to its pre-2000 road-end just beyond Sulpher Creek.</p> <p>I could probably write a small book regarding my experiences backpacking, climbing and following Crowder & Tabor routes through and across regions of the Glacier Peak Wilderness I've accessed from this Forest Service Road. I'm not certain that even then I could begin to convey what those experiences have meant to me throughout my life. Without the benefit of the Suiattle Road access, those trips would have been far fewer, and indeed with both massive road and trail footbridge washouts in the early 2000's, I lost the opportunity to introduce my own children to that region as they became old enough to enjoy the longer backpacking trips necessary to explore and cross the Suiattle headwaters. I have so cherished. As adults, they will still make the opportunity on their own for those experiences, but I'll no longer be able to join them.</p> <p>While the Wilderness Act passed before I finished high school, I became quite active in campaigns to add lands to Wilderness in both Washington and Alaska from the early '70's through 80's. It became clear to me then, and it has held true through the years that when relatively few citizens are aware of what the full environmental and habitat-loss costs of specific resource extraction plans or development are, it is far too easy for large corporate development to get its way. I am not anti-economy at all, but if I think back to what would have been lost if Kennicott Copper had had their way on Miners' Ridge, I feel sick.</p> <p>People need to experience wilderness (of whatever type) firsthand to begin to understand its value. Reducing human interaction with a region as close as possible to zero does not protect the wilderness, habitat or watershed values long-term.</p> <p>Arguments that the Wilderness will be overrun if the road is restored to its full length are absolutely specious and certainly not grounded in direct experience with this area. When I last passed through the Image Lake basin in 1985, the Forest Service mitigation efforts in that area had brought dramatic improvements in restoration to what I first experienced in 1973. The 9 to 16 miles of valley trail plus the additional miles climbing out of the valley will continue to protect those regions. And judging from the number of bear and other wildlife we've encountered on the floor of the Suiattle, the habitat is doing just fine. This is not a road access to</p>	B	Thank you, your comment is noted.

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	timberline!		
	The proposed realignment of the roadbed back from the floodplain and around or bridged across wetlands are appropriate and certainly should be carried out, together with the mitigation work proposed on the intermittent sections to be abandoned. But vehicle access to the trailheads at the previous end of the Road should be maintained.		
64. 09/9/12 email	I write as an avid hiker and lover of the Glacier Peak Wilderness. I spent several summers living and working at Holden Village and I believe that this is the most wild and beautiful part of our state. However, since the decimation of the White Chuck River and Suiattle River roads, it has become even more difficult to access the deepest parts of this vast area. I support the reopening of the Suiattle River Road so that others may experience the truly wild heart of Washington.	B	Thank you, your comment is noted.
65. 09/9/12 email	I just wanted to tell you that I support Alternative B, the repairing of Suiattle River Road to its end at milepost 23. It would be great to be able to hike on the Green Mountain, Huckleberry Mtn, and Image Lake Trails.	B	Thank you, your comment is noted.
66. 09/9/12 email	I am writing to you to ask that the Suiattle River Road be repaired and reopened. This road has historically provided access to a large number of trails and spectacular areas for many people. It would be tragic that it would now be closed to motorized access since those areas would be so difficult to access that only the elite could get to them. There are plenty of other areas in this state for those elite, so let's not exclude us more common people who want to go to this area to hike a trail or two.	B/C	Thank you, your comment is noted.
67. 09/9/12 email	Please pursue alternative B to reopen the Suiattle River Road.	B	Thank you, your comment is noted.
68. 09/9/12 email	Please pursue alternative B to repair the Suiattle river road and reopen access to many Glacier Peak trails.	B	Thank you, your comment is noted.
69. 09/9/12 email	I am a stock user from Skagit County and also belong to the Backcountry Horsemen of Wa, we do a lot of trail clearing on many different trails, including the Pacific Crest Trail. Without being able to get to some of these trailheads because of washed out roads, it's difficult to continue our volunteer work, not to mention search and rescue. Please consider Alternative B.	B	Thank you, your comment is noted.
70. 09/9/12 email	I am in support of rebuilding sutiattie river road # 26	B/C	Thank you, your comment is noted.
71. 09/9/12 email	I am a former Washingtonian who grew up in the town of Marysville, Washington. I now live an located in Chicago, Illinois. This is a comment letter in favor of restoring access to the Northwest section of Glacier Peak Wilderness and the PCT (Alternative B). I visit the Glacier Peak Wilderness every other year since I believe it is one of the most beautiful places in the world. In one recent visit (2008-9), I was able to gain access to the trailhead only via a rigorous trip on road bike with a backpack on my shoulders. I support Alternative B since this makes many of the trails and lakes of the Wilderness available to the public. In the event that this alternative is not adopted, access will be limited to the extremely wealthy who have the time and money to use alternatives such as the Wenatchee trailhead. Suiattle River Alt B will provide day or overnight access to the dozens of miles of wilderness trail, an attractive outcome to far more people who wish to enjoy the Glacier Peak Wilderness. I believe Alternative B likewise is good for Darrington, which obviously has been in decline in recent years. I see Alternative B as a means to have Darrington transform itself into a major	B	Thank you, your comment is noted.

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<p>outfitting hub</p> <p>72. 09/9/12 email</p> <p><i>Note: This commenter has comments below that are referencing FHWA's response to comments in the March 2012 EA. Examples include R-2, R3-5 etc. To differentiate between new (September) comments and responses and those of the past, we have added the month of September.</i></p> <p>Because this Amended EA is nearly identical to the most recent Sunsite River Road Repair EA issued in March 2012, the comments we submitted at that time are still relevant, and are copied below. We also offer the following specific remarks on the FHWA responses to our April letter.</p> <p>September Comment 1: Response 1: There is absolutely no mention on the referenced pages of the effects that resuming and ongoing auto traffic would have on wildlife, air and water quality, noise pollution, endangered fish populations, etc.</p> <p>September Comment 2: R2: This response does not satisfactorily address our comment.</p> <p>September Comment 3: NOTE: If an irrevocable decision has already been made to keep Road 26 open to its end (as seems to be the argument used for repaving the entire road), why was Alternative C even considered? The "logic" is inconsistent here.</p> <p>September Comment 4: R3 - 5: (Error on p. E-209—CE (that we received after the fact by FOIA request only) was dated 4-2-2010, not 2009).</p> <p>September Comment 5: Even a small percentage of habitat loss is indefensible in light of the spotted owl's shaky status. Furthermore, when viewed on a forest-wide scale, the cumulative effects of this habitat loss are indeed significant.</p> <p>September Comment 6: The noise of ongoing traffic is not considered in the EA. The example given of a marbled murrelet nest near US 101 is not an equivalent situation, since this busy highway represents ongoing, relatively constant traffic, which is not the same as intermittent automobile noise.</p>			<p>September Response 1: The AEA, Appendix E, page E-208, Response 1 directs the commenter to the AEA where key issues are identified that were used to provide focus for the environmental analysis. Neither internal or external review, nor scoping identified the resumption of auto traffic as an issue.</p> <p>While the environmental consequences of construction activities and resulting impacts are discussed for all resources in Chapter 3 - Environmental Consequences, specific mention of resumption of ongoing traffic was targeted to species or resources that would be influenced by the resumption of traffic. See the AEA, pages 138 to 139 for grizzly bear effects, pages 140 to 141 for wolf/effect, and Wildlife Forest Plan consistency on pages 142 to 143 (includes cumulative effects) for wildlife effects. Effects on air quality from resuming traffic are described in the AEA on pages 153 to 154, and water quality effects are described in the AEA on page 106. "Fisheries" effects from resuming traffic listed potential poaching scenarios in the AEA on pages 14 to 19.</p> <p>September Response 2: Without specific identification of what is not satisfactorily addressed by Response 2, no additional response can be provided.</p> <p>September Response 3: See AEA, Appendix E, page E-208, Response 2. "The selection or non-selection of Alternative C will no be based on whether or not the Forest Service is willing to consider conserving the remainder of the road to a trail, but rather on the purpose and need for the project and the evaluation of impacts under the various alternatives." A selection of Alternative C would mean that FHWA would fund repairs with ERFO dollars only to MP 19, leaving the rest of the road for the Forest Service.</p> <p>September Response 4: Commented noted. The correct date is 4-2-2010.</p> <p>September Response 5: This comment is a repeat of a comment made by commenter 370 and is addressed in the Amended EA, Appendix E, Response to Comments (p. E-209) Response 3</p> <p>September Response 6: Disturbance effects relative to background levels of disturbance (such as on-going traffic) are a part of the effects assessment in the Forest Programmatic Biological Assessment. The information in this assessment is utilized in project consistency forms and stand-alone, formal Biological Assessments which were part of the Section 7 Consultation for the Shuttle Road 26 project.</p> <p>The Forest Programmatic Biological Assessment (2002, currently under revision) considers: 1. Type of data available concerning disturbance of murrelets; 2. The best available information concerning disturbances to murrelets due to researchers, vehicles, loud noises, aircraft and pedestrians near the nest not due to research; 3. Disturbances of birds in other water-oriented taxonomic orders; 4. Rational behind setting of detectability, alert, disturbance for various activities covered in the Biological Opinion for the Forest; 5. The likelihood of injury due to these activities; and 6. The best available information concerning disturbance of birds other than murrelets. (Pages 62 to 65, 75 to 76 MBS Programmatic BA)</p> <p>The Forest Programmatic BA describes murrelet harassment most likely to occur under three situations: 1. Noise is so loud that it interrupts and/or precludes essential behavior; 2. A noise and/or visual stimulus is in such close proximity to the nest that the activity is perceived as a threat and causes flushing from the nest or missed feedings; and 3. Noise is loud and sudden, has rapid onset, thereby causing startledflush response. Background forest road traffic (typically 50 decibel level (cumulative sound exposure level [SEL] or lower) is considered within background ambient noise levels not leading to murrelet harassment as described above.</p> <p>September Response 7: There is the Final Summary report by the Scientific Science Panel for <i>Marble Murrelet Underwater Noise Injury Threshold</i>, prepared by Science Applications International Corporation, September 7, 2011. There is also a <i>Synthesis of Noise Effects on Wildlife Populations</i>, US Department of Transportation, Federal Highway Administration, September, 2004. Waterowl studies reported as much disturbance from human presence as noise.</p> <p>September Response 8: The AEA provides the cumulative effects assessment of the proposed action with past, present and future actions for old-forest associated species of spotted owl (AEA, p. 133 to 134) and marbled murrelet (AEA, p. 137).</p> <p>September Response 9: The Response 6b as written in the AEA, (page E-211, Response 6b) is correct. The distribution of hikers on Road 26 is described in the Amended EA, Appendix E – Response to Comments (p. E-214, Response 11e.) Response 11e. "The EA on pages 59 to 70 describes recreational consequences of the proposed project or no action. The</p> <p>September Comment 7: R5c: Have any studies been done on effects of noise on marbled murrelets? This response only says "there is no indication in literature of car noise being a deterrent." Is there any indication in the literature that it is <i>not</i> a deterrent? If this issue has not been studied, the lack of evidence for harm is irrelevant.</p> <p>September Comment 8: R6a: The assertion is made that the area involved is too small to matter—but this is precisely the purpose of cumulative effects analysis. Thus "small" habitat disturbance needs to be considered along with all the other habitat loss on the forest.</p>

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	<p>September Comment 9: R6b. Again, the EA is inconsistent. How can there be enough hikers on the closed road with Alternative C to impact grizzly bears, if the trails are, in fact, "inaccessible" as stated in the AEA?</p>	No action alternative results in visitor use in the upper Sunnale drainage starting from MP12.6, concentrating users from one start point. Alternatives B and C provide multiple start points for recreational activity at various trailheads, campgrounds, and dispersed use areas, resulting in a dispersal of users within the drainage.
	<p>September Comment 10: R7-9a: This response does not satisfactorily address our comment.</p>	<p>September Response 10: Without specific identification of what is not satisfactorily addressed by Responses 7-9a, no additional response can be provided.</p>
	<p>September Comment 11: R9b: One cannot help but wonder whether the AEA preparers have walked "Road" 2670 recently. The surface is no longer compacted, as noted in our April letter.</p>	<p>September Response 11: The response in 9b identifies a portion of the landscape which is part of the existing road system with corresponding compaction.</p>
	<p>September Comment 12: R9c: This response does not satisfactorily address our comment.</p>	<p>September Response 12: Without specific identification of what is not satisfactorily addressed by Response 9c, no additional response can be provided.</p>
	<p>September Comment 13: R9d: The contradictory report was not disclosed in the EA, as required.</p>	<p>September Response 13: This comment is a repeat of a comment made by commenter 370 and is addressed in the Amended EA, Appendix E – Response to Comments (p. E-212, Response 9d).</p>
	<p>September Comment 14: R10: How many <i>more</i> new fish redds would have been observed at milepost 20.8 had the 2006 slide not occurred? Yes, poaching is addressed on page 77 of the (March 2012) EA; and our comment pointed out the inconsistency there that the EA did not acknowledge that closing the rd at FS Rd 2680 would reduce poaching. This response does not address our comment.</p>	<p>September Response 14: The question of number of new fish redds that would have been observed if the 2006 slide had not occurred is not a relevant question because the 2006 slide was not a controlling factor for fish spawning at milepost 20.8.</p> <p>The number of fish spawning in Downey Creek, below Downey Creek Bridge (milepost 20.8) is related to the position of the Sunnale River on its floodplain, which affects the length of clear water habitat available to the fish. If the Sunnale River channel is on the near (Downey Creek) side the clear water habitat is reduced in length and few fish spawns in that location. If the Sunnale River channel is on the far side of the floodplain then the clear water habitat is longer and a larger number of fish could use the habitat for spawning.</p> <p>Poaching may occur regardless of the road condition and most often occurs in easily accessed but lightly visited locations. Having higher visitor use discourages poaching as people are less likely to knowingly violate fishing regulations when being observed by other visitors. Poaching is illegal and game laws are enforced by the Washington Department of Fish and Wildlife.</p>
	<p>September Comment 15: R11a: This response does not satisfactorily address our comment. Why does the EA state that the streams in question are non-fish-bearing, when the Herrera report claims that they are capable of supporting fish? If in fact, there are no fish occupying these streams at present, is it because previously installed culverts did not allow fish passage?</p>	<p>September Response 15: The stream reaches where the culverts are located with the proposed road relocation are not fish bearing. The wetland surveys by Herrera included stream reaches on the Sunnale River floodplain adjacent to the Sunnale River in the vicinity of Road 26 where the road would be decommissioned. These stream reaches have a lower gradients and the potential to be fish-bearing. As the streams leave the floodplain the gradient increases to the point where fish migration is obstructed.</p>
	<p>September Comment 16: R11b, c, d: These responses do not satisfactorily address our comments. Less fit individuals will still have access to the point at which the road is closed to cars. They may walk as far as ability and desire allow. This is true no matter where the road ends. Closing the road still increases opportunities for less athletic recreationists to walk (or ride) on a relatively level trail. We have observed numerous families with young children enjoying recreational opportunities on the closed portion of the road, including a family of five "bicycle-camping" at Downey Creek campground. It should be noted that this family did not appear to be of the notorious "urban elitist" ilk, but rather regular folk using plastic buckets as bicycle panniers.</p>	<p>September Response 16: Without specific identification of what is not satisfactorily addressed by Response 11b and 11c, no additional response can be provided. The response in the Amended EA, Appendix E – Response to Comments (p. E-214 Response 11d) explains the goal of expanding recreational access locations.</p>
	<p>September Comment 17: R11e: It is possibly true that users would be concentrated in first few road-to-trail miles—as happens on almost all trails—however, Alternative C would increase <i>de facto</i> trail miles, while still providing motorized access to several trails.</p>	<p>September Response 17: commented noted alternatives, including those considered but eliminated from detailed study and alternatives considered in detail assessed a variety of recreational attributes, including parking.</p>
	<p>September Comment 18: R11f: If parking and other issues are considered to be outside the scope of this EA, they should not be used in arguments against specific alternatives. The FHWA cannot have it both ways.</p>	<p>September Response 18: Wild and Scenic River (WSR) is a congressional designation and therefore takes precedent over Forest Plan allocations and standard and guidelines.</p>
	<p>September Comment 19: R12a: We are glad to hear that mitigation measures would be enforced.</p>	<p>September Response 19: comment noted</p>
	<p>September Comment 20: R12b, 13: It appears from the merged land allocation map on page 18 of the March 2012 EA (p. 19 of the AEA) that all of the proposed new route upstream of milepost 13 is Late Successional Reserve (LSR) overlain by Wild and Scenic River (WSR) designation. As stated on page 5 of the AEA, "where the standards and guidelines of the 1990 Forest Plan are more restrictive or provide greater benefits than those of the 1994 RD, the existing standards and guidelines apply." We interpreted this to mean that the SSG for LSR would apply where they are stricter than WSR.</p>	<p>September Response 20: While Road 2670 is not drivable, a stored road (ML 1) is still a part of the USFS road system. The response in the Amended EA, Appendix E – Response to Comments (p. E-215, Response 14a) is correct in that Alternative B and C would reduce the road footprint with the utilization of Road 2670 as part of the proposed Road 26 reconstruction, and the decommissioning of approximately 1 mile of road.</p>
	<p>September Comment 21: R14a: Road 2670 is not a drivable road. Decommissioning the part of Road 26 bypassed by the new route would not actually reduce total road miles. To the contrary, the new road construction would increase road effects, as it would take sometime for the decommissioned road to return to a natural state. This response does not address our comment regarding ACS Objectives 1 and 2.</p>	<p>September Response 21: : Without specific identification of what is not satisfactorily addressed by Response 15, 15b, 15c, 16a, 18a and 18b, no additional response can be provided.</p>
	<p>September Comment 22: R15, 15b, c; R16a, R18a, b: These responses do not satisfactorily address our comments.</p>	<p>September Response 22: : This comment is a repeat of a comment made by commenter 312 and 370 and is the Amended EA (AEA), Appendix E – Response to Comments (p. E-151, Response 8 and Page E-243, Response 7).</p>
	<p>September Comment 23: R19a: The FHWA and USFS have failed to provide the documentation (e.g. project schedule) that would support their assertion that these repairs were treated as an emergency. Interestingly, the AEA contains <i>no</i> mention under "Public involvement" on page 21 of the illegal CE (issued without public notification) that prompted EA.</p>	<p>September Response 23: : This comment is a repeat of a comment made by commenter 312 and 370 and is the Amended EA (AEA), Appendix E – Response to Comments (p. E-217, Response 12a)</p>
	<p>September Comment 24: R19b: Again, the FHWA cannot have it both ways. The EA and AEA repeatedly assert that relocating the road is an improvement in numerous ways, but not a betterment? And how could the new Downey Creek bridge, which is far different from the bridge it would replace, not represent a betterment? A cost-benefit analysis is required in this case.</p>	<p>September Response 24: : This comment is a repeat of a comment made by commenters 312 and 370 and is the Amended EA (AEA), Appendix E – Response to Comments (p. E-151, Response 8 and Page E-243, Response 7).</p>
	<p>September Comment 25: R21a: We very much appreciate that these modifications to the road footprint are being considered,</p>	<p>September Response 25: : The AEA on page 1 and Appendix A describes the history of repair efforts, including the 2010 CE.</p>

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	however, they should be mandated in the contract, not merely thought of as "potential adjustments" to be made. Furthermore, it is impossible to tell from this cursory description whether the proposed modifications would adequately address our concerns.		The Downey Creek Bridge extension would not be funded by ERFO. September Response 25: - Comment noted. See Amended EA (AEA). Appendix E – Response to Comments (p. E-159, Response 26).
	September Comment 26: R22. This response does not satisfactorily address our comment. The expense of a new footbridge could still be covered by a fisheries grant. A wooden bridge would not have to be made with treated lumber—the cedar timber bridges of yore lasted for many decades! In summary, although very slight improvements may have been made to the project (see R21 above) the amended EA is still riddled with problems. We reiterate our previous comments and requests		September Response 26: Comment noted. Additional information is provided in the Amended EA (AEA). Appendix E – Response to Comments (p. E-19, Response 3), commenter 43.
	After the above comments the Pilchuck Audubon Society attached the comments they submitted in March 2012, which can be reviewed in the AEA.		
73.	09/8/12 email	I support alternative B on the suiatte river road repair project	B Thank you, your comment is noted.
74.	09/8/12 email	I sent an earlier comment on the repair of the Suiattle River road repair in favor of Alternative B repair to the end. My comment still stands I still favor fixing the road all the way to the end.	B Thank you, your comment is noted
75.	09/8/12 email	Concerning the repair & re-opening of the Suiattle River Road in Washington State, I am writing to support Alternative B plan, which will repair the road to its end (Milepost 23). Because of washouts on this road, some of the best hiking trails in the Glacier Peak Wilderness have been off-limits for years. I urge you to repair and re-open the entire road so we can enjoy these public lands again. We have lost many trails and roads over the years to flood damage, it's vitally important to have more trails available for people to enjoy.	B Thank you, your comment is noted
76.	09/8/12 email	I strongly support Alternative B to reopen the Suiattle River Road to its end at milepost 23. Please pursue this project to reopen the road ASAP.	B Thank you, your comment is noted
77.	09/8/12 email	I am asking you to please consider repairing the Suiattle River Road so the public can access the many destinations that are reached via this road. I am a member of the Washington State Hi Lakers fishing club. We use this road to access over a dozen lakes including Boulder, Pear, Tupto, Cub, Bench, Woods, Louise, and Crater Lakes. My family and friends have been fishing these lakes for generations and hope to continue to enjoy this healthy recreational activity. I also use the Suiattle River Road to hike with my friends that do not fish. The Green Mountain Trail, Huckleberry Mountain, and Sulfer Mountain Trail are all accessed by the Suiattle River Road. I am also a grouse hunter and the Suiattle River Road is a prime area to hunt grouse with my son. I have spent many opening days of grouse season hunting the Suiattle River Road and had great success. My family also owns a classic 1986 Toyota Motorhome and the Buck Creek campground is a fantastic place to use our little RV, along with the Downey Creek parking area for day trips and base camp hikes. I believe in preserving wildlife habitat and taking utmost care of our wilderness areas. I also think we should be able to enjoy our forest lands while enjoying the activities I have mentioned in this letter. Please consider opening the Suiattle River Road.	B/C Thank you, your comment is noted.
78.	09/8/12 email	Please repair and reopen the road to the end. I have camped at Buck Creek camp ground since I was about 10 years old (I am now 61) and have missed it very much for the last few years. I also miss the access to hike on the Suiattle trail which access Image lake and the Vista Ridge area of Glacier Peak. This is an historic road and there is no legitimate reason to not be able to use it.	B Thank you, your comment is noted
79.	09/8/12 email	I would love to see the Suiattle River Road near Darrington repaired and reopened. I've missed being able to get to the trailheads since it washed out.	B Thank you, your comment is noted

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80. 09/8/12 email	I have spent the last 6 years of my life enjoying the outdoors. From Ross Lake to the Enchantments, from Rainier to Adams, from Hood Canal to the Columbia, and from Baker to Glacier, I've seen a lot of it. Glacier Peak Wilderness is potentially one of the most beautiful and well hidden gems of Washington, and as much as I would like to hide it away for myself and those other few who are brave enough to trek it, I also want everyone to see its glory. That's why I ask that you please strongly consider repairing the road. It would help a lot of hikers out and it would make the day of many a tag tag mountain climbers (such as me and my friends) much easier.	B	Thank you, your comment is noted.
81. 09/8/12 email	I'd like to voice my support for restoring the Suiattle River road. While it's true that any road is a breach of true wilderness, restoring this primary access road along the river is a far cry from breaching pristine mountain slopes with crisscrossing logging roads, as found in many parts of the national forests.	B	Thank you, your comment is noted.
	I might have time for one backpacking outing per summer, meaning at most one chance to access this particular wilderness. Conversely, I can arrange a number of day hikes. Unfortunately, without this road, I have not been able to hike in the Glacier Peak wilderness for many years. I think many people are like me and in the same situation.		
82. 09/8/12 email	I am sending this email to voice my support for the Alternative B plan to repair the Suiattle River road. As a Boy Scout leader, I led several backpacking trips into the Glacier Peak Wilderness starting along this road before it was closed by the floods of 2003. Protecting the environment is very important to me. Taking young people out into the wilderness to build their appreciation for what we have is also very important to me. I strongly feel that this road should be rebuilt so we are not cutting off this marvelous section of the North Cascades.	B	Thank you, your comment is noted.
83. 09/8/12 email	I have been disheartened by the diminishing access to our national parks and national forests. I believe by not repairing roads that create access to our forests and especially the Sauk Suiattle river road that there will be more harm than preservation in the long run by restricting access to our public lands to only physically and financially able people to access our public lands. This will have an ultimate consequence of not enough people having an interest in our forests and will lead to further problems such as a disconnect of the people from our forests. This will lead to less and less stringent protections over time and will ultimately benefit "industry" which is not a good thing for those of us who treasure our national parks and national forests. I strongly support the opening and repair of the Sauk Suiattle River road to help the citizens whom are disabled, elderly and who do not have the financial or physical means to go on multi week backpacking adventures to enjoy our National Forests and National Parks.	B	Thank you, your comment is noted.
84. 09/8/12 email	I fully support Alternative B, repair the full Suiattle River Road!	B	Thank you, your comment is noted.
85. 09/8/12 email	Please re open the road to access,	B	Thank you, your comment is noted.
86. 09/8/12 email	I would like to submit the following comments in response to the amended Suiattle River Road Project EA. Since my first letter, I have reviewed the changes to the EA and have also used the North Fork Sauk Trailhead. I reviewed the changes to the EA and found them mostly to be minor or insignificant. I still prefer Alternative B. The amended EA shows less impact to the environment overall. On page 30 in regards to Site #3, the impact of the reroute was reduced from 8 acres to 6 acres. On pages 104-105, the impact to wetlands was changed from "approximately 0.66 acres" to "approximately 0.66	B	Thank you, your comment is noted.

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	<p>to 0.8 acres.” In my opinion, this was an insignificant change. An area of 0.8 acres still fits in the category of approximately 0.66 acres. The difference amounting to 0.14 acres is a pretty small patch of wetlands. Overall, I think the amended EA shows less impact on the environment.</p> <p>On September 1, 2012 I began a backpacking trip that left from the North Fork Sauk Trailhead. I can confirm from first hand experience that the North Fork Sauk Trailhead is being very heavily used. Arriving on a Saturday morning at 8 am, the parking lot had three or four undesignated parking spaces available, and there were over a dozen vehicles parked along the trailhead access remaining morning hours. This trailhead is being so heavily used because it is the only west side access for climbers to Glacier Peak. It is essential that Alternative B be adopted to provide another access to Glacier Peak for climbers. In addition to reducing the impact on the North Fork Sauk Trailhead, climbers using the Suiattle Trailhead would be using different routes up Glacier Peak thus reducing the impact on the climbing routes accessed via the North Fork Sauk Trailhead.</p> <p>The text of my original comment letter follows.</p> <p>I would like to submit the following comments on the Suiattle River Road Project EA. In summary, I would like Alternative B (Full Restoration of Road Access) to be selected because it provides the public the best access to several trails that enter the Glacier Peak Wilderness and the environmental impacts of Alternative B are minimal.</p> <p>According to my hiking log, my first hike using the Suiattle River Road for access was a backpack trip up the Downey Creek Trail on July 6, 1974. I was 21 years old at the time and hiked with my father who was 55 years old. We would not have been able to do that hike if the road were closed at MP 12.6 as it is today or even if the road were open to the junction with Road 2680. It would have been too far to hike on a weekend.</p> <p>Now that I’m getting close to 60 years of age, I’m very much concerned about access for senior citizens. Senior citizens need the Suiattle River Road opened to the end so they can access and enjoy the several trails accessed by the road. I can speak from personal experience that the trails starting from the Suiattle River Road provide great hiking experiences. In addition to Downey Creek, I have hiked Sulphur Creek (1974), Image Lake (1976), Mica Lake (1977), Bachelor Meadows (1980), Green Mt. (1983) and Huckleberry Mt (1992). I have been wanting to return to many of these destinations, but with the Suiattle Road closed since 2003, that is not possible. In addition, I have been wanting to hike the Sulphur Mt Trail for years. That is a strenuous hike and adding a road walk makes it not possible for me. I would also like to be able to take my family camping at one of the campgrounds on the Suiattle Road. Finding camping spots on weekends is very difficult. We need more campgrounds and opening the Suiattle Road to the end would reopen two more campgrounds.</p> <p>I think it is important to select Alternative B to help disperse Glacier Peak Wilderness users. Currently with the Suiattle Road closed and the White Chuck River Road closed, the only access left is the North Fork Sauk Trail. The North Fork Sauk Trail is now getting badly overused. Not only would Alternative B let more people enjoy the Glacier Peak Wilderness, but it would help the tourist economy of Darrington which has been hit hard by the road closures.</p> <p>Another reason I support Alternative B, is that the other two alternatives do not provide any parking. Alternative B would open the road to the large parking lot at the road end. Alternatives A and C would have just a gate with no parking and no good turn around, especially for horse trailers.</p>		

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87.	09/8/12 email		I would like to reiterate my support for Alternative B, to repair the Suiattle road at all 8 sites with relocations away from the river.	B	Thank you, your comment is noted.
88.	09/8/12 email		Please repair and reopen this road, and do what you can to keep it open and maintained if there is any future flood damage, etc.	B	Thank you, your comment is noted.
89.	09/8/12 email		Both my wife and I would like to add our comments and approval to the decision to at last reopen the Suiattle River road. As a teacher I see students every week who have not experienced the forests and wildlands here in Washington State. Teaching Pacific Northwest History and describing our unique geography is made much more difficult when the younger people in our region have not experienced the same areas that I have. To deny access to our state heritage is the very last thing that any responsible organization should be engaged in. We will need more support for protecting our precious natural resources in the future and it will only come from new environmentalists, not from short sighted attempts to restrict public access to public lands. As a lifelong member of the Audubon Society I can guarantee you that the Pilchuck branch of that organization does not represent anyone other than a few misguided minds of their own. This area should return to the great learning and exploring laboratory that it was for my wife and I for so long. We heartily endorse reopening the road.	B	Thank you, your comment is noted.
90.	09/8/12 email		As a member, and current president, of the Traildusters Chapter of Back Country Horsemen of Washington, I am supporting Alt B for the repair and reconstruction of the Suiattle River Road. Myself and hundreds of other BCHW members have, too long, been denied access to Glacier Peak. Where the road is gated, the ride is too far from many trailheads and camp sites. Because of busy work schedules the ride to the trailheads does not allow for day and/or weekend riding into the wilderness. Alt B: Repair the road, including the bridges.	B	Thank you, your comment is noted.
91.	09/8/12 email		I support Alternative B, opening the entire Suiattle River Road.	B	Thank you, your comment is noted.
92.	09/8/12 email		As a lifelong horseback rider I am supporting <u>ALT B</u> for the repair of the Suiattle River Road (see prior comment). Where the road is now gated, in order to access many trails/trailheads, the ride is too long and time consuming for a weekend ride into Glacier Peak Wilderness. I would like to, once again, ride the trails my family and I rode years ago before Mother Nature closed the road. Again, I support <u>ALT B</u> : repair the road to its former terminus.	B	Thank you, your comment is noted.
93.	09/8/12 email		RE: this article - http://blogs.seattlepi.com/seattlepolitics/2012/09/07/the-suiattle-road-repair-and-reopen/ My comment is: I own property near the Suiattle river road and have have hiked in that area many times. I support repairing and re-opening the road.	B	Thank you, your comment is noted.
94.	09/8/12 email		Please implement Alternative B and open the road to the end.	B	Thank you, your comment is noted.
95.	09/8/12 email		I am again giving my full support to the rebuilding and opening to the public Suiattle River Road #26	B	Thank you, your comment is noted.
96.	09/07/12		I am a property owner in the vicinity of the sunk-Suiattle river junction and I urge you to reopen	B	Thank you, your comment is noted.

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97. 09/07/12 email	Please repair the road to the end at Sulphur Creek. We are long past the point of further delays, appeals and studies. I am confident the repairs will be done in an environmentally friendly manner while still allowing the public to enjoy this area.	B	Thank you, your comment is noted.
98. 09/07/12 email	I support Alternative B. Hope you make it happen.	B	Thank you, your comment is noted.
99. 09/07/12 email	I have considered the revised EA, and I still state my support for Alternative B, repair the full Suiattle River Road!!	B	Thank you, your comment is noted.
100. 09/07/12 email	I have considered the revised EA, and still state my support for Alternative B, repair the full Suiattle River Road.	B	Thank you, your comment is noted.
	I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.		
	2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.		
	3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.		
	4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.		
	5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.		
101. 09/07/12 email	As a hiker, climber, hunter and pack country skier I enthusiastically support alternative B.	B	Thank you, your comment is noted.
102. 09/07/12 email	I strongly support the repair of the Suiattle Road to its end. Together with the White Chuck River Road, the road was one of two access corridors into to the depths of the Glacier Peak Wilderness from the west side of the Cascades. The White Chuck River Road will not be repaired, which makes repair and reopening of the Suiattle even more essential.	B	Thank you, your comment is noted.
103. 09/07/12 email	I support the Alternative B plan for the Suiattle River Road. It is not practical to ride a bike on the road when doing a the Ptarmigan traverse. Or would it work for a one way hike.	B	Thank you, your comment is noted.
104. 09/07/12 email	I support opening the road to it's end.	B	Thank you, your comment is noted.
105. 09/07/12 email	I'm writing to let you know that I am in support of Alternative B, which will repair the road to its end at milepost 23.0. The Suiattle River Road is important for hikers, other recreation users and the nearby town of Darrington. Please restore access to this beautiful area.	B	Thank you, your comment is noted.
	I am an active member of the Skagit Chapter of Back Country Horsemen of Washington, and I am writing in regard to the Suiattle River Road Environmental Assessment.		
	I am in FAVOR of a full repair of this important access to the Pacific Crest Trail. A lot of outdoor recreational groups have already given overwhelming support - 86% of the comments that were submitted earlier this year - of the Alternative Plan B, a full restoration, of that area. Please do not cause the loss of this treasure by failing to act in a positive way on it's restoration.		

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106. 09/07/12 email	I'm writing to urge you to adopt alternative B for the repair of the Suiattle River Road. This road is necessary for practical access to much of the Glacier Peak Wilderness.	B	Thank you, your comment is noted.
107. 09/07/12 email	Please repair the road - thanks!	B	Thank you, your comment is noted.
108. 09/07/12 email	My preference: re-open the Suiattle River Road all the way to Sulphur Creek, all the way to the end of the road! Doesn't need to be paved - probably shouldn't be paved - but it does need to be open in order to have reasonable access to Downey Creek trail, Suiattle Trail, Milk Creek trail.	B	Thank you, your comment is noted.
109. 09/07/12 email	I support the Western Federal Lands Highway Division of the Federal Highway Administration and the Mount Baker-Snoqualmie National Forest in the proposed repair of the Suiattle River Road. Access to mountain trails is one of the reasons that brought me to Washington and is one of the reasons I choose to remain here. Trails provide the opportunity to learn and experience nature in ways that most people don't have access to. They promote healthy lifestyles and provide established corridors for people and allow preservation of the wilderness around them. I strongly support the repair of the Suiattle River Road to the end of the road so that long inaccessible trails to the Glacier area from the West may be enjoyed once again.	B	Thank you, your comment is noted.
110. 09/07/12 email	The Suiattle River Road has allowed access to the Glacier Peak wilderness, an area of such outstanding natural beauty that it would be a National Park if it were located in some other state. Along with providing for hunting, fishing, camping and hiking, the road has carried generations of citizens who have become passionate defenders of wilderness after falling in love with this place. Whatever negligible damage occurs during repair of this road will be more than offset by the innumerable recreation opportunities created, the economic benefits for Darrington, Arlington and Granite Falls, and the next generation of conservationists inspired by what they find there. As Edward Abbey said, "The idea of wilderness needs no defense, it just needs more defenders."	B	Thank you, your comment is noted.
111. 09/07/12 email	I strongly support Alternative B, which will repair the road to its end at milepost 23.0! Restoring access to one of the most beautiful sections of WA mountains is extremely important to the outdoor culture in WA state. Thanks.	B	Thank you, your comment is noted
112. 09/07/12 email	I am a member of the Backcountry Horsemen of Washington, both my husband and myself are horse owners that ride the backcountry. We are both support Alternate B.	B	Thank you, your comment is noted.
113. 09/07/12 email	I understand that with the update of the EIS people are asked to resubmit comments about their support of the Suiattle River road opening. I am totally in support of the reopening of the road. I along with 8 of my friends totally support this opening as we are regular users of the road. I will be so happy when this road is reopened again. You see my father is partially handicapped now and looks forward to being able to drive up there so he can do small hikes once again. Thank you very much for working on this and look forward to it's reopening.	B	Thank you, your comment is noted.
114. 09/07/12 email	Not much else to say, but to pitch in that repair of this road would help keep northwest wilderness accessible for locals and tourists. I hope many others look at this as I do and support alternative B.	B	Thank you, your comment is noted.
115. 09/07/12 email	As a member of Back Country Horsemen, who has also put in over 100 hours of volunteer time so far in 2012, I'm expressing my support for: Alternative B and a full repair on Suiattle River Road. As a stock user we need full restored access (Alternative B) While using the trail systems in WA for personal trail riding & enjoyment, as a Back	B	Thank you, your comment is noted.

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116. 09/07/12 email	<p>Country Horsemen volunteer we also need access to help maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trail heads along with having suitable parking areas for trailer towing vehicles.</p> <p>I am writing you today to comment on the Suiattle River Road Environmental Assessment in favor of a full repair of this washed out (since 2003) primary access to the Pacific Crest Trail from the west north of Stevens Pass. I support for Alternative B, repair the full Suiattle River Road.</p> <p>I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>It is not sufficient to restore for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>I am in agreement with Back Country Horsemen of Washington endorsing Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>	B	Thank you, your comment is noted.
117. 09/07/12 email	<p>I have reviewed WA FS ERFO 071-2023 Environmental Assessment and support Alternative B. This alternative is the best alternative to restore wilderness access, for the tens of thousands of hikers, equestrians, fishermen, and hunters. The Suiattle road at MP 23 is a critical gateway to four seasons/year around access to National Forest Wilderness Area. Alt B will restore recreation access for thousands of hours of visits to the growing Western Washington populace. Due to the current road damage, the upper Suiattle River, Sulphur Mtn, Downey Creek, Miners Ridge, and Milk Creek trails are beyond the reach of the typical physical abilities of day hikers due to the much greater distances. Alt B will provide 20 to 50 times more recreation opportunities due to the better National Forest access. The Glacier Peak Wilderness is a national treasure and needs access to be shared via the more extensive trail access Alt B provides. I have backpacked much of the Glacier Peak Wilderness and I have observed much less visitation, including fewer family groups, in the years following the 2003/2006 road damage to the Suiattle and White Chuck roads. I fear lost of wilderness access will lead to the long term loss of public support of wildernesses.</p>	B	Thank you, your comment is noted.
118. 09/07/12 email	<p>I'd like to comment once again on the repair to the Suiattle River Road. As far as I can tell, not much has changed, and my comments to the March 2012 EA are still valid. My original comments are below:</p> <p>"I am an avid backpacker and camper and am writing to express my support of the restoration of the Suiattle River Road (Forest Road 26) to its end, beyond Sulphur Creek Bridge at Mile 22.9. I support Alternative B, as well as the repair of the eight damaged sites along the road. This will allow access to campgrounds, seven trailheads and parking for hikers, bikers and river enthusiasts, and allow for dispersed recreation. Since the flood events of the last decade, I have been unable to introduce my children to this area, which contains some of the best hiking, lakes and peaks of the western Glacier Peak Wilderness."</p>	B	Thank you, your comment is noted.

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119. 09/07/12 email	I urge you to save the Suiattle Road and truly believe that Alternative B is our best chance to provide access to this beautiful, wild area."		
120. 09/07/12 email	<p>Below is my original comment letter for the Suiattle River Road EA. I supported and still support Alternative B, repairing the road to the end. Per the new EA, all my points remain the same.</p> <p>I understand that out of the over 400 submitted comments received in the initial Suiattle River Road repair question by the USFS/FHWA, 86% wanted a full restoration (Alternative B), 29% wanted the road closed, and the rest wanted something in-between or were uncertain.</p> <p>As a member of the Back County Horsemen of Washington, I agree that we members, on the other hand remain quite certain - we'd like action: please repair the Suiattle River Road in 2013 without further delay. [It does seem incredible that 2% of the public addressing this matter can hold hostage the road reconstruction.]</p> <p>I am a stock user with the Back Country Horsemen of Washington. Our membership contributes tens of thousands of hours annually to maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>The members of the Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>	B	Thank you, your comment is noted.
121. 09/07/12 email	My husband and I support Alternative B, which will repair the road to its end at milepost 23.0. We are day hikers, and our access depends on driving further so we can reach the trailheads and take hikes without backpacking.	B	Thank you, your comment is noted.
122. 09/07/12 email	I support the fight to reopen suiatte river road! please open and maintain this road.	B	Thank you, your comment is noted.
123. 09/07/12 email	I am a stock user with BCH of WA and I request Alternative B for full restoration of the Suiattle River Road. This is vital for stock trailers to reach the trailhead so that supplies can be packed in for trail repair and search and rescue. It is time for the road to be completely restored.	B	Thank you, your comment is noted.
124. 09/07/12 email	My favored outcome hasn't changed. I still would like to see the road repaired to end.	B	Thank you, your comment is noted.
125. 09/06/12 email	I want the road opened to the Sulphur Creek Trailhead	B	Thank you, your comment is noted.
126. 09/06/12 email	<p>Thank you for the opportunity to comment on the Suiattle River Road project. The following is my position:</p> <p>The reopening of the Suiattle River Road would allow hundreds of hikers to visit some of the most beautiful and remote sections of the Glacier Peak Wilderness. I just returned from a visit to the lovely Image Lake located on Miner's Ridge. It was a rare opportunity now, because the access</p>	B	Thank you, your comment is noted.

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	involved a 18 mile trek from the Phelps River Trail. If the Suiattle River Road were to be reopened to MP 23, there would be far better access from western Washington visitors to the Miner's Ridge area.		
127. 09/06/12 email	I can't seem to find my comments from last time on my hard drive and wading through 400+ comments to find mine proved to be onerous. In any case, I still support Alt B (road open to end) as I have all along. I can tell you that the process of having people resubmit over and over again is getting to be tedious, and I feel as though there will be way fewer responses this time.	B	Thank you, your comment is noted.
128. 09/06/12 email	I am writing to support alternative B for the repair of the Suiattle River Road to the End. This will allow access to existing campgrounds, parking areas and many trails. I think it is important to keep this area open to families, older people and well, everyone to enjoy. I understand that money is short but if there is one road that needs to be repaired I feel that this is the one. Additional email sent 09/06/12 I still support opening the Suiattle Road to the end as I stated in the previous comment period. The new EA has not changed my opinion.	B	Thank you, your comment is noted.
129. 09/06/12 email	My family and I have traveled this road to the Sulpher Creek camp ground a couple times a year for the past 35 years. I now have a son of my own and want to share with him the place that I have such fond memories of camping when I was his age. This is such a beautiful part of our state and I believe the road can be repaired with minimal damage to our forest. We have been so disappointed that the Suiattle River Road has been closed for so long and hope that it can be fully restored to the Sulpher Creek camp ground please.	B	Thank you, your comment is noted.
130. 09/06/12 email	This road goes past so many spectacular hiking trails that it's a shame it's not been fixed. I went up in there about 15 years ago and I'd love to get back up in there again. This road accesses some of the grandest areas of our state ! The road opening would surely help tourism in the Darrington area as well. Please open the road back up to its end.	B	Thank you, your comment is noted.
131. 09/06/12 email	Once more, we urge support of Alternative B to repair the Suiattle Road to its end. Please help us and future generations to access OUR Wilderness.	B	Thank you, your comment is noted.
132. 09/06/12 email	This email is sent to comment on my support of Alternate B. I am a horse participant (I do not own my own stock) who rides the back country. I am also a member of the Backcountry Horseman of Washington. I support the FULL repair of the washed out primary access to the Pacific Crest Trail from the west, north of Stevens Pass. The FWA needs to repair the Suiattle River Road in 2013 without further delay!! This road is not only crucial to the delivery of supplies and materials to crews maintaining trails in the Glacier Peak Wilderness, it is also a recreational access route and is used for Search and Rescue operations when needed. It is imperative that we keep the back country accessible for our future generations!!	B	Thank you, your comment is noted.
133. 09/06/12 email	My most memorable hikes in Washington have been in the wonderful Glacier Peak area, especially the crest trail and Milk Creek and Circle peak. These areas as you know have been inaccessible since the road washed out. Please repair this road for me and all of the other backpackers and future generations to enjoy. This is a one of a kind area, among the finest in the world. The road should be open to Sulphur Creek campground, a very special place. I agree there would be an impact on the environment, but why have the wilderness if no one can access it!	B	Thank you, your comment is noted.
134. 09/06/12	We are writing again to add our names to the large group of stock users to ask for restoration of the	B	Thank you, your comment is noted.

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email	road (alternative B). We have been denied access to this area since the road was washed out in 2003!		Thank you, your comment is noted.
135. 09/06/12 email	Thank you for the opportunity to comment on the Amended Environmental Assessment for the repair of the Suiattle River Road. I have read the Amended EA and there is nothing in it that changes my comments submitted in April 2012, which I have attached below, for your convenience. I am in favor of Alternative B, repairing the Suiattle Road to the end. Thanks for all your hard work and patience on this project. For every one comment for the full repair of this road, there are hundreds of others wishing it, but not participating in this process.	B	Thank you, your comment is noted.
136. 09/06/12 email	I just read the new EA and am sending this email share my thoughts. I am in full favor of Alternative B, which involves complete repairs for the Suiattle to the traditional end of the road. This road is just too important to lose. I really want the opportunity to take my kids camping where I camped as a kid. To hike to Green Mt, and to stroll the Suiattle should be something every person is able to do. Alternative B will allow this 75 year old family tradition to continue. Thanks for your attention.	B	Thank you, your comment is noted.
137. 09/05/12 email	Please complete the proposed road improvements all the way to the Sulphur Creek trailhead and restore the recreational access to this area. This has gone way too long and is an terrible example of allowing a few loud and non-representative squeaky wheels to set the agenda. The government knows what is right and correct for the total public benefit and should not entertain the "recreational politics" of a few extreme people. A credibility check on the demographics of the people on this issue would result in a much faster response time. The courts should be better informed on these demographics. Few people support the extreme environmentalists that pose as representative of many. Lets return to common sense. go ahead and do it.	B	Thank you, your comment is noted.
138. 09/05/12 email	Please do what you can to reopen the Suiattle River Road so those of us with limited mobility can enjoy the splendor of this great area. We remember the area as kids and want to do what I can so others can have the same opportunity. Don't allow this area to be put in a "closet" that is locked except to those that are capable hikers who profess to be the saviors of the environment. A road is nothing more than a 20 wide trail, please keep that in mind. But, we can access a road better than a goat trail.	B	Thank you, your comment is noted.
139. 09/05/12 email	Keep the Suiattle River Road open for all to enjoy. Don't fence me out. Regarding the proposed alternatives to the Suiattle river road project, I'd like to voice my strong preference for option A - No Action. My friends, family and I use this area regularly for recreation. In western Washington, there are dozens if not hundreds of campsites available for cars. The same is true for walk-in camping only. This area is singular in that the area can be accessed easily by for or by bicycle. As a bicycle camper, I am typically stuck with camping in campgrounds also available to cars. With the road in its present condition, camping is available without all of the noise of stereos, RV generators, cars, trucks and motorcycles that are endemic to car camping grounds. Additionally, people that get into a campground under their own power are less likely to be noisy and belligerent - as it is a lot harder to bring in lots of alcohol without a car! As this area stands today, it is a singular recreational opportunity for camping access by bicycle - let's keep it that way. Additionally, there are certainly revenue opportunities for the Forest Service if the campsites are minimally maintained and opened for hikers/bicyclists only. I would gladly pay a slightly higher nightly rate for a campsite where I can bike in and to not have to deal with cars in the campground.	A	Thank you, your comment is noted.

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140. 09/05/12 email	I still feel that the complete restoration plan B is the only acceptable plan, the search and rescue, fire protection, recreational, and thinning of fire load are the utmost reasons to reinstate the 26 road to its original state.	B	Thank you, your comment is noted.
141. 09/05/12 email	I am in support of option A, leaving the area unrepairs beyond the mile marker 12 washout. The area is still very accessible by low impact hikers, bikers and horses. People have adapted since the washouts and there are many people back there greatly enjoying themselves without the dusty, loud vehicles. The argument for opening the road all the way back to Sulphur Creek is moot because I've seen dozens of hiker/skiers coming back from the PCT hiking or riding a bike out. This is a chance to 1) Save tax money, by not repairing the washouts 2) Save tax money by not repairing the inevitable future washouts 3) Creating a quiet, peaceful place for people to enjoy non-motorized activities.	A	Thank you, your comment is noted.
142. 09/05/12 email	I concur completely with the comments in the Everett Herald Editorial dated Sept 5 2012. Repair the Suiattle river road completely.	B	Thank you, your comment is noted.
143. 09/05/12 email	Please, please reopen access from the Western slopes to Glacier Peak wilderness via repairs of Forest Road 26 This is just ridiculous that it is taking so long.	B	Thank you, your comment is noted.
144. 09/05/12 email	I can't remember when the last time I had a chance to hike into the area due to the road closure. My family & I have been waiting many years for the Suiattle River Road to reopen. We would like to see it opened all the way. We would also like to see the Sulphur Creek campground reopened, along with Buck Creek campground. Growing up my parents took us to camp at Sulphur creek for many years. We would do day hikes up Sulphur trail and Downey Creek trail. I have very fond memories of the area and had continued going as an adult, until the wash outs. I really hope we will be able to go again some day in the near future. I would love to have a few more trips with my 70+ year old dad, my nephews and many friends I have promised to take someday. It would mean a great deal to our family. Thank you for your consideration.	B	Thank you, your comment is noted.
145. 09/05/12 email	I am writing to reaffirm the preference for the Town of Darrington regarding the level of repair work on the Suiattle River Road project. We continue to support Option B as referenced in our previous communications.	B	Thank you, your comment is noted.
146. 09/04/12 email	As long time land owners in the Suiattle river watershed we are in favor of the proposed option to restore the road its entire length. This road has historically provided good access to trailheads, camp grounds and the river, many people use this area for cultural and family outings. A restored road would also be an economic boost to the town of Darrington, most people going to the Suiattle river pass thru Darrington and would purchase fuel and supplies for their visit. We also feel a fully restored road would provide safer driving for those accessing the watershed.	B	Thank you, your comment is noted.
147. 09/04/12 email	Please repair the road all the way to the end. I have wanted to climb glacier peak for hour years but can't take the time to hike to base camp and back. The road will make this possible.	B	Thank you, your comment is noted.
148. 09/04/12 email	I am a stock user with the Back Country Horsemen of Washington- Island County Chapter. As a group we maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. It is my understanding that stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provide the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to recreational access this route was used for Search and Rescue operations. It is not sufficient to	B	Thank you, your comment is noted.

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	<p>Restore use for truck/trailer combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for current and future generations of users. The Back Country Horsemen of Washington endorse Alternative B as the only viable option amongst the proposed Alternatives. We join with other user groups including the WTA in endorsing Alternative B.</p>		
149. 09/04/12 email	<p>I am writing again in regards to the Suiattle River Road EA, this time in regards to the amended assessment. The EA changes do not change my preference in alternative, and I will re-submit my earlier comments asking that you <u>proceed with Alternative B</u> which would repair and restore full access along Forest Road 26 to the Suiattle Trail (784) trailhead in the MBS National Forest. I enjoy riding my mules in the mountains and have used this trail in the past. As a mule rider I would be pulling a horse trailer on USFS 26 and the only viable parking or turn around area is the Historic Trailhead near Sulphur Creek. The only way to restore access to stock riders of this primary access trail (784) would be Alternative B and full restoration of FS 26. Annual trail maintenance costs could also be reduced by providing full access with Alternative B, as this trail is a primary arterial into the Glacier Peak Wilderness. With FS 26 restored a shorter access to the entire trail system north of Glacier Peak would be provided to the Forest Service, its maintenance contractors and volunteer workparty groups that show up for only one day of trailwork.</p> <p>I am opposed to Alt. "A" which would effectively lock users out of this portion of Our National Forest and Wilderness area unless the user possessed the time and means for an extended trip via other routes. Certainly a small and select user group.</p> <p>I am opposed to Alt. "C" which unjustly provides access to a single user group, foot traffic.</p> <p>Alternative C would not restore the road or trail to a condition that would allow stock access. Federal projects are to provide equal access for all. In fact the Suiattle trail used to be one of the only trails to provide a handicapped access into the wilderness experience, as the lower section of the trail was handicapped accessible from the trailhead for a ways. In fact I was part of a volunteer workparty that rerouted the trail around a historically large tree which fell across the trail along the handicapped accessible portion. This trail work was right before the original storm damage in 2003. Please restore full access to this trail by approving Alternative B.</p>	B	Thank you, your comment is noted.
150. 09/03/12 email	<p>As a horseback rider and member of Back Country Horsemen of Washington, I support the talking points listed below and presented to you by our organization. The work that we do supporting trail maintenance on all Washington trails keeps these trails open not just for pack and saddle stock users, but for all recreational users of our lands. Please immediately approve Alternative B listed below and do not wait for additional public comments. Thank you for your consideration and action on this important trail corridor.</p> <ol style="list-style-type: none"> 1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. 2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations. 	B	Thank you, your comment is noted.

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	<p>3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>		
151. 09/03/12 email	I am a horse/mule owner that rides in the back country.		Thank you, your comment is noted.
152. 09/03/12 email	As members of back country horsemen, my wife and I support the option B as we need access to the area to help maintain and enjoy the trail system with our horses.	B	Thank you, your comment is noted.
153. 09/02/12 email	<p>It seems to me that the proposed new roadway is inherently doomed at MP 13. The EA notes that at this location, the river channel is migrating northward at a rate of 11 feet per year. The new roadway is 20 feet above river level on the erosion-prone terrace, and 150 feet from the present channel. This means that at the present rate, the river will swallow up the roadway in a little over a decade--- or it could happen all at once in the next big storm, perhaps this winter. When this happens, relocating the road further from the river will be difficult at best because the slope steepens considerably; even if it is physically possible, rebuilding on the steep slope would be environmentally destructive and prohibitively expensive. The EA states that the new roadway at this point faces a 'moderate to high risk of future flood damage,' but I believe this is an understatement. In fact, the new roadway faces a very high risk (if not certainty) of total annihilation, as we have witnessed in the recent past with the Whitechuck and upper Stehekin roads. Building the new roadway will involve significant cutting of old-growth forest and a risk to riparian ecosystems; this is far too great a cost for a road which is unlikely to last more than a few years after it's completed.</p> <p>People have a strong emotional attachment to this road, which is understandable--- it provides access to one of the most magnificent places on the planet. But we should not let this blind us to reality--- the road is unsustainable, no matter how much we want it there. Instead of crying about it every few years when the road gets washed out, we should learn to regard this wild and volatile river with the fascination and wonder and respect that it deserves. The road should be decommissioned beyond MP 12, and the old roadway should become the basis for a trail system and interpretive facilities that could enable people to learn and study and regard with amazement this exceptionally-wild, exceptionally-tempestuous, exceptionally-magnificent river. Climate change and the increasing frequency of catastrophic storms in this region means that river volatility will increasingly be a part of our lives. Sometimes this is inconvenient, but it is also inspiring wonder and curiosity. The floods are a symptom of a living planet, of the raw forces that will continually reshape this place we call home--- and people are really interested in that (this is why we flock to Mt. St. Helens). It would be a tragic blunder to think of the Suiattle River as something to be driven past on the way to the high country, or as some sort of annoying impediment to wilderness access. This river is in fact one of the great wild forces of the Pacific Northwest, a destination in itself. And ultimately, the river will decide the fate of this road.</p> <p>Instead of fighting it, we should learn to regard its decision with respect and appreciation.</p>	B	Thank you, your comment is noted.
154. 09/02/12	As a stock user and a member of Backcountry Horsemen of Washington I am in favor of	B	Thank you, your comment is noted.

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email	Alternative B for the Suiattle River Road FR 26 repairs Our organization maintains trails throughout the state of Washington. Suiattle River Road FR26 provides the only way to bring supplies and materials to crews working in the Glacier Peak Wilderness. It is also the only way for search and rescue to be effect in the area. We need fully restored access (Alternative B) which includes fixing the bridges. Anything less is not sufficient to maintain the kind of work that our organization does. As a Backcountry Horseman of Washington let me state again the importance of Alternative B as the only acceptable alternative for pack and saddle stock users.		
155. 09/02/12 email	Please endorse Alternative B for those of us who are Back Country Horsemen members--it's the only workable plan for full access.	B	Thank you, your comment is noted.
156. 09/02/12 email	We need roads like this to support the users and enjoy the beautiful land we all own. The four of us in our family request/support (Alt B)	B	Thank you, your comment is noted.
157. 09/02/12 email	Thank you for your support and concentration. The following points reiterate those made on the first calling for public comment and at the public meeting held in Everett. Granted these are a cut and paste list of reasons Alt. 2 makes the most sense for our use of back country trails, but is the easiest way to communicate the importance and clear statements of the reasons. 1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. 2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations. 3. It is not sufficient to restore use for truck/trailer combinations simply to the Green Mountain access trail (Alternative C). We need fully restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. 4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users. I fully endorse Alternative B, as the only acceptable proposed Alternative for pack and saddle stock.	B	Thank you, your comment is noted.
158. 09/02/12 email	I have been asked to comment for the Traildusters Chapter of the Back Country Horsemen of Washington. As many comments have been made for reasons the Suiattle Road should be repaired, I will only reiterate that our chapter fully supports the reasons forwarded by Back Country Horsemen of Washington and its members, Traildusters endorses Alternative 2 as the only reasonable solution to the repair.	B	Thank you, your comment is noted.
159. 09/02/12 email	I am a member of Back Country Horsemen of Washington. I ride my horse on backcountry trails& do maintenance when necessary & permitted. I support Alternative B for the Suiattle River Road.	B	Thank you, your comment is noted.
160. 09/02/12 email	Gentlemen, We need this road fixed for the following reasons. This is the second time I have commented. 1. We need this road fixed to maintain trails in this area.	B	Thank you, your comment is noted.

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	<p>2. We need full access restored Alternative B to ensure use of the back country for all users(horsemen,hikers & bike riders)</p> <p>3. Alternative B will ensure fixing the Downey Creek and Sulfur Creek bridges and approaches.</p> <p>4. By doing the above volunteer work crews,search and rescue can continue to get the job done.</p>		
161. 09/01/12 email	<p>1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p> <p>Please stop asking for comments, over 400 were received-just please fix the road so we can continue to help with trail maintenance, enjoy our great land and ride.</p>	B	Thank you, your comment is noted.
162. 09/01/12 email	<p>1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>5. As a senior who enjoys the backcountry on horseback, I support The Back Country Horsemen of Washington's stand in endorsing Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p> <p>Horses need access and with that comes a wider recreational base. Don't exclude all but the young and fit from our wild lands! Thank you for your consideration.</p>	B	Thank you, your comment is noted.
163. 08/31/12 email	<p>I just wanted to write to inform you that I strongly support the project to re-open the Suiattle River Road. As the Puget Sound area continues to grow, I think it is important that we maintain access to as many of our wilderness trailheads as possible so that future generations can actually enjoy the huge and wonderful wilderness areas that we have. Most people in Seattle don't even know that</p>	B	Thank you, your comment is noted.

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164. 08/31/12 email	<p>Please consider the following.</p> <p>1. I am both a hiker and stock user and am an active member of the Back Country Horsemen of Washington (BCHW). BCHW works to maintain trails throughout the state with pack and saddle stock support and in cooperation with many non-equestrian organizations. BCHW wouldn't (won't) be able to sustain this effort without road access to critical trailheads or without having suitable parking areas for trailer towing vehicles.</p> <p>2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only access for bringing supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route is also critical for Search and Rescue operations in adjoining wilderness areas.</p> <p>3. It is not sufficient to simply restore use for truck/trailer combinations to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and their respective approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of trail systems must be given a top priority to support continuing opportunities in the back country for current and future generations of users.</p> <p>5. I, as a member of Back Country Horsemen of Washington, an avid hiker, and taxpaying citizen of Washington State, support and endorse Alternative B as the only acceptable alternative proposed for this project.</p>	B	Thank you, your comment is noted.
165. 08/31/12 email	<p>I am writing in support of full reconstruction of this road access. I am a Washington backcountry horseman who rides these trails and we also work together to maintain trails throughout the state. We cannot sustain this effort without road access to the trailheads and without suitable parking areas for trailer towing vehicles.</p> <p>It is imperative that we have full restored access (ALTERNATIVE B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. Restoration of access for agency and volunteer maintenance of the trail systems must be given top priority if we are to continue providing opportunities in the back country for the current and future generations of users. As a member of the Back Country Horsemen of Washington I endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>	B	Thank you, your comment is noted.
166. 08/31/12 email	<p>Suiattle River Road Amended EA comment</p> <p>My comments regarding the 'amended' EA remain the same as for the original EA, I SUPPORT ALTERNATIVE B.</p> <p>As a recreational saddle and pack stock user, access to our public lands and the associated backcountry is vital. For too long now Glacier Peak, the PCT and connecting trailheads have been virtually inaccessible via the Suiattle River Road.</p> <p>The draft Environmental Assessment realistically has only one viable alternative, Alternative B. Repair and realignment of Forest Service Road #26 to its terminus at Sulphur Creek Campground makes sense for a number of reasons.</p> <p>Economically the 'Mountain Loop' communities of Darrington and Granite Falls are dependent on eco-tourism dollars. Reduction in logging on National Forest lands has caused great hardships on these communities and the surrounding area. Alternative B would restore recreational access so</p>	B	Thank you, your comment is noted.

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	<p>Long denied, to the public, who otherwise would be unable to enjoy Glacier Peak and the Suiattle River. These families and others would bring dollars to Loop Communities.</p> <p>Safety is always paramount, especially in the backcountry. Alternative B would allow quick and easier access for fire, law enforcement, search and rescue, and other medical providers. Rebuilt and repaired bridges at Downey Creek and Sulphur Creek would allow full access to the Suiattle Trail and the PCT.</p> <p>Funding is available for the repair/realignment of the entire road. Tribes and Fisheries, in cooperation, have agreed and support Alt. B. Through grant money, Downey Creek Bridge reconstruction is funded.</p> <p>Alternative B with reconstruction/repair to Sulphur Creek campground allows for parking areas large enough to accommodate tow vehicles with horse trailers. The other alternatives provide NO parking for these vehicles.</p> <p>Saddle and pack stock users volunteer tens-of-thousands of hours to construct, repair and maintain backcountry trails. Without full access to the terminus of Road #26, this volunteer activity has been curtailed. Alternative B would, again, provide access to campgrounds with sufficient parking and relative closeness to trails in need of repair.</p>		
167. 08/31/12 email	Please kindly repair the road to Suiattle River in 2013 without delay. This the only way to bring supplies to crews maintaining Glacier Peak Wilderness and recreational purposes.	B	Thank you, your comment is noted.
168. 08/31/12 email	Just to note to state that we (Jessica and David) support Alternative B. We own (2) horses and ride in the back country of our state. We both also belong to Backcountry Horsemen of WA (BCHW) Tahoma Chapter	B	Thank you, your comment is noted.
169. 08/31/12	<p>1. I am also a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p> <p>I agree with all statements but what is going on here? Many of us sent in email in the spring 86% responders want full restoration. Now what in the h... is this EA about?</p>	B	Thank you, your comment is noted.
170. 08/31/12 email	<p>My husband and I are Backcountry Horsemen.</p> <p>We enjoy the wilderness trails with our children and grandchildren.</p> <p>Please repair completely the Suiattle Road so we can access the trails with our stock.</p>	B	Thank you, your comment is noted.
171. 08/31/12 email	<p>1. I am a chief crew leader for Washington Trails Association and the Pacific Crest Trail Association, representing northwest hikers and trail maintenance volunteers. Hikers and trail</p>	B	Thank you, your comment is noted.

Date of Comment	Comment	Comment Summary and/or Alternative Preferred ABC	Action Item and/or Response
	<p>maintenance volunteers need access to the trails that the Suiattle river road serves.</p> <p>It should not take our government ten years to repair and restore access that we had before 2003.</p> <p>2. I am also a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>3. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>4. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>5. Restoration of agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>6. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>		
172. 08/30/12 Email	<p>Attached is our official letter of submission with regards to the Suiattle River Road Revised EA. Our position hasn't changed as a result of the modifications in the revision. We still want the full road restored, Alternative B.</p> <p>BACK COUNTRY HORSEMAN OF WASHINGTON 110 w. 6th Ave. PMB 393 Ellensburg, WA 98926 DATE: August 29, 2012</p> <p>Please consider our remarks below from the April comment period on the EA released earlier this year as still applicable to the revised Environmental Assessment. We adamantly support that the full road should be repaired as in Alternative B, and we are disappointed this has not happened already as clearly is endorsed by the broad public support during the prior public input period.</p> <p>After a decade of considerations and reconsiderations, please complete the repairs of the damaged sections of the road.</p> <p>- Robert Gish, President, Back Country Horsemen of Washington</p> <p>The Back Country Horsemen of Washington (BCHW) represents the interests of saddle and pack stock users throughout Washington State. Our volunteers provide pack and ground support to the different land agencies in our state including those that service the Pacific Crest Trail (PCT). The iconic PCT is the backbone horse and hiker trail system in the west from Mexico to Canada, and its prominence in Washington State makes it an outstanding available resource to our membership. Maintaining the PCT and its access trails, such as the Suiattle River Trail and the Milk Creek Trail, is no small feat when the weather is cooperative. However due to a decade of difficult weather including the storms of 2003 and 2006/2007, trails are failing, bridges are collapsing, and infrastructure is being washed away. Much of this is occurring within designated wilderness where access itself is a problem and for the most part, motorized tool and mechanized transport are not allowed. At a time when trail maintenance funding is most needed, the economic stressors on our nation have not resulted in relief to public lands agencies' trail and road maintenance budgets. Volunteerism can help, but it can only do so much in addressing backlog maintenance. This is particularly true since volunteer project work still needs agency approval, and this approval is often held up in layers of process or lack of funding.</p>	B	Thank you, your comment is noted.

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	<p>Add to this the failure of the road system. Clearly, maintenance and use of our public land trails system requires that staff, volunteers, and users must be able to get to the trails. With the loss of the White Chuck Road, access to the PCT west of the North Cascades depends upon the Suiattle River Road and the connecting trails in the Suiattle River corridor. This critical road has itself been closed as a result of damage from the abovementioned storms. As with any washed out section of road, this road should have been repaired many years ago. And yet now it is 2012, and we are back to evaluating whether the road should be repaired and what kind of repair should be done.</p> <p>Our public lands trail system serves all Americans, not just those that are young, affluent, non-disabled, and willing to spend days walking just to get to the campgrounds and trailheads that existed before the roads were damaged. Furthermore, these individuals are typically users who just expect that the trails and trail infrastructure will be there and functioning as if by some sort of miracle. Volunteers as well as the agency work force know that to keep trails operational, it is necessary to get to them with supplies, materials, labor, and tools. This work requires access as well as suitable parking for stock towing vehicles. With the Suiattle River Road, this can only occur by restoring the road to its former full length, including returning traffic over Downey Creek and Sulphur Creek. We cannot perform any "miracles" if we can't find a place to park!!</p> <p>Back Country Horsemen of Washington strongly supports Alternative B as the only suitable alternative offered in the Environmental Assessment for the Suiattle Road repair. All eight failed sections need to be repaired including the relocation segments. We encourage that this work occurs as soon as possible without additional unnecessary delays, since failed action and lack of maintenance can lead to additional erosion based damage to the road exacerbating the current situation.</p>		
173.	<p>08/30/12 Email</p> <p>I am a stock user and a member of Back Country Horsemen of Washington. Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness.</p> <p>We need this road repaired to the extent that it can handle the truck traffic for stock use and to accommodate trail maintenance crews. We need full restored access (alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>This must be given a top priority if we are to continue providing opportunities in the back country.</p> <p>The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>	B	<p>Thank you, your comment is noted</p>
174.	<p>08/30/12 email</p> <p>I cannot believe we are still only discussing this issue and no plans have been solidified to move forward. We need to fully restore the Suiattle River Road in 2013 without further delay. This is our primary access to the Pacific Crest Trail from the West, North of Stevens Pass. I understand that 86% of comments from your last survey indicated a desire for full restoration. We are wasting time and money. Below are the reasons I believe full restoration is important.</p> <p>I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access</p>	B	<p>Thank you, your comment is noted</p>

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	<p>trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p>		
175. 08/30/12 email	<p>Attached you will find The Wilderness Society's comments on the Amended Environmental Assessment for the Suiattle River Road Project. I have also attached our comments submitted in April on the 2012 March EA as a reference.</p> <p>The Wilderness Society is pleased to submit these comments regarding the Suiattle River Road Project. Our organization works to protect wilderness and inspire Americans to care for wild places. To this end, we work in partnership with local communities, businesses, agencies, conservation organizations, recreationists, and local citizens to find solutions for the preservation and stewardship of national public lands. We deeply value access to our public lands, and wilderness areas in particular. The Wilderness Society views the full restoration and repair of Suiattle Road beyond the Sulphur Creek Bridge as imperative; for this reason, we strongly support Alternative B.</p> <p>In 2008, The Wilderness Society launched the North Cascades Initiative to protect and enhance the wildlands and waters of the region. The focus of the North Cascades Initiative is twofold: (1) protect wildlands through public land designations as well as private land acquisition; and (2) expand opportunities for responsible, reasonable recreation on our public lands. Over the next ten years, The Wilderness Society will work with myriad partners to achieve our ambitious protection and recreation goals.</p> <p>The Mt. Baker-Snoqualmie National Forest—and the Darrington District—are integral partners as we move forward with our work in the North Cascades.</p> <p>The Suiattle Road (Forest Road 26) is one of the few access roads and western portals to the majestic Glacier Peak Wilderness, one of the most wild and least accessible wilderness areas in the state due to its rugged terrain. With the loss of the upper portion of the White Chuck River Road (FR23), the Suiattle is a crucial access point to the wilderness. Seven trailheads, two campgrounds, 27 miles of the wild and scenic Suiattle River, and tens of thousands of acres of forest provide countless recreational opportunities for all ages and interests along this route. More than 120 miles of trail is accessible via the seven trailheads along the road, 113 miles (93 percent) of these trails are within the Glacier Peak Wilderness area.</p> <p>The Wilderness Society strongly supports Alternative B, reopening the Suiattle River Road to Sulphur Bridge (milepost 22.9), because of the following:</p> <p><input type="checkbox"/> It will reopen important recreational resources that provide opportunities for all ages, interests, and ability levels to explore the wildlands and waters of the Suiattle, Glacier Peak Wilderness, and beyond. Many of these resources have been underutilized since 2003, and most have seen very little use since 2006. Green Mountain trail use has decreased 98 percent (from 1,414 to 19 reported users) since 2006 and although trails such as the Suiattle, Pacific Crest Trail, and Upper Suiattle</p>	B	Thank you, your comment is noted

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<p>River have all been restored since 2006, few have been able to enjoy the new trails.</p> <p><input type="checkbox"/> It will reopen important cultural resources for elders and tribal members to traditional and cultural areas along the Suiattle River. Without repairs, the last 10.6 miles of the Suiattle Road as well as seven miles of other roads are inaccessible by motorized vehicles. These closures extremely limit access to traditional and cultural areas and opportunities to gather traditional forest products such as cedar, mushrooms, and berries.</p> <p><input type="checkbox"/> There is broad public support for reopening the road. Scoping comments gathered in 2011 showed that 90 percent of responders want the Suiattle Road reopened as soon as possible (Environmental Assessment, page 21). At the public meeting held in Everett on March 29, 2012, anecdotal evidence showed strong support for restoration of the road for all.</p> <p><input type="checkbox"/> The various site repairs and road enhancement activities have been well studied through various plans, assessments, and reviews over the years. The Environmental Assessment presents a strong case for implementing Alternative B, and it is the only alternative most consistent with the Forest Plan, the Forest Roads Analysis, and the Access and Travel Management Plan.</p> <p><input type="checkbox"/> The Federal Highway Administration has the money in hand to complete the repairs and open the road by 2013. Funding for any public infrastructure project is limited in the present economic situation and federal funding for road repair has declined significantly over the years. Through the political leadership of congressional representative Rick Larsen, the \$4 million in funds from the Emergency Relief for Federally Owned Roads program is available until September 2013. Through an innovative partnership with the Sauk-Suiattle Tribe, additional funding for the Downey Creek Bridge repair has been secured through the state Salmon Recovery Funding Board program. Any delay in this project will jeopardize these hard-to-come-by funds for the repair and restoration of the road.</p> <p><input type="checkbox"/> Reopening the road would allow the Forest Service to properly manage and maintain facilities along the road and in the wilderness. While recreational use of the Suiattle Road has decreased significantly since 2003 and more so since 2006, the Forest Service has continued administrative management and maintenance of facilities along the road. Motorized access along the entire road is critical to providing adequate public safety, regulatory compliance, and maintenance of National Forest recreational sites and facilities.</p> <p><input type="checkbox"/> Proposed repairs will enhance the outstandingly remarkable values of the Suiattle's Wild and Scenic River designation. Alternative B will enhance the wildlife, fish, and scenic values that led to the Suiattle's designation by rerouting the road in several locations, reconnecting the river with its wetlands, and facilitating channel migration. The Downey Creek bridge extension and embankment removal will significantly improve fish passage and restore the floodplain of the creek.</p> <p><input type="checkbox"/> Reopening the road would increase visitors to the area, thereby increasing economic activity in the greater Darrington area. The cumulative effects of 2003, 2006, and 2007 flood events have resulted in a reduced number of tourists and visitors to Darrington businesses as well as the Darrington Ranger Station (Environmental Assessment, page 147). While reopening the road may</p>			

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	<p>have a small positive economic impact on the town of Darrington, any increase in activity is good for the local economy.</p> <p>The Wilderness Society strongly supports Alternative B and hopes to see the Suiattle Road restored in its entirety as early as 2013. The road has been closed for nearly a decade, extremely limiting the ability of the public to enjoy the multitude of recreational opportunities along the corridor. The Wilderness Society firmly believes to create future stewards of our public resources we must provide the opportunity for people to experience the rivers, trails, lakes, forests, and peaks that will inspire them to care.</p> <p>Thank you for the opportunity to comment on the Environmental Assessment. The Wilderness Society is confident that Alternative B presents the best opportunity to protect the environmental integrity of the area and provide critical access to valued recreational resources. Feel free to contact Kitty Craig, Regional Conservation Representative, at (206) 624-6430 or kraig@tws.org with any questions or further comments regarding this comment letter or our work in the North Cascades.</p>		
176.	<p>Sincerely, Peter Dykstra Pacific Northwest Regional Director The Wilderness Society</p> <p>The Wilderness Society is pleased to submit these comments regarding the Suiattle River Road Project. Our organization works to protect wilderness and inspire Americans to care for wild places. To this end, we work in partnership with local communities, businesses, agencies, conservation organizations, recreationists, and local citizens to find solutions for the preservation and stewardship of national public lands. We deeply value access to our public lands, and wilderness areas in particular. Notwithstanding the changes made to the March 2012 Environmental Assessment and documented in the August 2012 Amended Environmental Assessment, The Wilderness Society stands by the position detailed in our April 17 comment letter. The Wilderness Society views the full restoration and repair of Suiattle Road beyond the Sulphur Creek Bridge as imperative; for this reason, we strongly support Alternative B. Please incorporate the attached comment letter, dated April 17, 2012, into the current comment period. As demonstrated by the public comments in Appendix E of the Amended Environmental Assessment, there is strong public support for Alternative B, the full restoration and repair of the road. Out of the 406 comments received, nearly 350 (86 percent) support Alternative B, 13 support Alternatives B and C, 22 support Alternative C, or some modified version, and only 7 support the no action alternative, Alternative A.</p> <p>The Wilderness Society appreciates the efforts of the Federal Highway Administration and the Forest Service to conduct a thorough Environmental Assessment for the Suiattle River Road Project and provide an additional level of detail in the Amended Environmental Assessment, namely:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Clarification on the timing and appeals process of the Suiattle Access and Travel Management Plan and how it specifically relates to the Environmental Assessment; <input type="checkbox"/> More detailed descriptions of some of the project sites such as road classifications, acreage 	B	<p>Thank you, your comment is noted.</p>

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	<p>Impacts, etc.,</p> <p><input type="checkbox"/> More detail on the general consistency of the Environmental Assessment with the Forest Plan as well as cumulative effects on heritage and treaty resources;</p> <p><input type="checkbox"/> Clarification on Forest Service coordination with the Fish and Wildlife Service regarding the revision and finalization of spotted owl critical habitat designation; and</p> <p><input type="checkbox"/> Addition of Appendix F which details consistency and responses with previous appeals and challenges.</p>		
	<p>As expressed in our April 17 comment letter, The Wilderness Society supports the full restoration and repair of the Suiattle Road for several reasons. Most importantly, the Suiattle Road is one of the few access roads and western portals to the majestic Glacier Peak Wilderness, one of the most wild and least accessible wilderness areas in the state due to its rugged terrain. It accesses numerous recreational resources valued by the public, such as 7 trailheads, 2 campgrounds, 27 miles of the wild and scenic Suiattle River, and more than 120 miles of trail (113 miles of trail within the Glacier Peak Wilderness area).</p> <p>The Wilderness Society strongly supports Alternative B and hopes to see the Suiattle Road restored in its entirety as soon as possible. The road has been closed for nearly a decade, extremely limiting the ability of the public to enjoy this special place. The Wilderness Society firmly believes to create future stewards of our public resources we must provide the opportunity for people to experience the rivers, trails, lakes, forests, and peaks that will inspire them to care.</p> <p>Thank you for the opportunity to comment on the Amended Environmental Assessment. The Wilderness Society is confident that Alternative B presents the best opportunity to protect the environmental integrity of the area and provide critical access to valued recreational resources.</p>		
177.	<p>08/30/12 email</p> <p>Regarding Suiattle River Road Environmental Assessment:</p> <p>I support alternate B. I am a horse owner who rides the back country so this road will be beneficial to me and my friends.</p>	B	<p>Thank you, your comment is noted.</p>
178.	<p>08/30/12</p> <p>I am a member of Backcountry Horsemen of Washington.</p> <p>I have lived in Snohomish & Skagit counties all my life. I am now retired. I spent many days and night's hiking in Suiattle watershed, fishing & enjoying myself. Now I cannot go up Suiattle road & some people do not want road repaired (#26) road should be repaired to end</p>	B	<p>Thank you, your comment is noted.</p>
179.	<p>08/30/12 email</p> <p>I am writing to encourage you proceed with Alternative B for repair by relocations and rehabilitation of Road 26 in the MBS National Forest.</p> <p>The evolution of reasons for the existence of our national forests has resulted in public recreation becoming one of the most important. Road 26 is vital for public access to our national forest recreational areas in this region.</p> <p>The most important reason for full rehabilitation of road 26 is public safety. Use of the road as a hiking trail is unsafe in its present condition. This is especially true at the Downey Creek</p>	B	<p>Thank you, your comment is noted.</p>

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180. 08/30/12	<p>crossing. There is presently no funding available for improvement of the route as a trail. Not only will it remain unsafe for at least several years, but the road, in its present location, being used as a trail will continue to deteriorate with future flood events. The Pacific Crest Trail crosses the trails originating from the end of road 26. Use of the PCT has increased greatly in the past several years. Search and Rescue organizations use road 26 to access hikers and riders in difficulty in this region of the PCT. During periods when helicopters are grounded due to bad weather (a common occurrence) the present condition of road 26 increases the time required to access the PCT by 24 hours or more. This time delay could be a life or death difference.</p> <p>Access to public recreation in our national forests for middle and low income tax payers is primarily a weekend occurrence. The present condition of road 26 makes access to the interesting wilderness areas of the MBS National Forest in the region of the Suiattle River drainage a very difficult to impossible weekend event. Thus the area has become the exclusive domain of an elite group with more free time available.</p> <p>Car camper use of Sulphur Creek Campground is non existent without repair of road 26. This was a popular campground in the Darrington area. With population growth, more, not fewer campgrounds are needed. If the road to Sulphur Creek is not repaired there will be considerable expense to MBS National Forest to decommission this facility. I am told the toilet facilities will need to be demolished and hauled out.</p> <p>Pack stock use of the trail system in the Suiattle River drainage has been an important aspect of recreational use of this area. Failure to implement Alternative B will effectively eliminate use of pack stock in this area. Neither Alternatives A or C would provide suitable parking for trucks or trailers bringing in pack stock to access these trails. In addition to pack stock being used for recreation, BCHW has participated in trail maintenance activities both with direct work and by using pack stock to carry tools and supplies for other user groups such as WTA for trail work events. Clearly USFS expense for maintaining trails in this area will increase or trail quality will decrease if Alternative B is not accomplished.</p> <p>With the loss of the White Chuck Road and trail in 2003, and the loss of the Suiattle River road beyond its current closure at milepost 12, the North Fork Sauk trail is becoming overused by equestrians, hunters, climbers, backpackers. The parking lot there is no longer sufficient, and the degradation of backcountry camps are testament to the impact of the closure of the Suiattle Road. If the Suiattle Road is not repaired, continued heavy use of the North Fork Sauk trail will degrade the wilderness experience that people hope to enjoy when they enter Glacier Peak Wilderness. User groups, including Washington Trails Association and Back Country Horsemen of Washington, are becoming a very significant part of trail maintenance. The long distances needed to travel to work sites without Alternative B being accomplished will severely curtail volunteer trail work parties in the Suiattle River drainage.</p> <p>Current use of the crossing at Downey Creek by hikers and pack stock users is damaging fish habitat. It is also potentially damaging to hikers and pack stock users as it is unsafe to use without rebuilding the bridge. This would be solved by instituting Alternative B.</p> <p>Traildusters Chapter of the Back Country Horsemen of Washington unanimously and enthusiastically supports the implementation of Alternative B of the Suiattle River Road Project. As tax payers we feel we are being severely restricted from using this beautiful portion of our National Forest.</p>	B	Thank you, your comment is noted

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email	washed out we can not access Suiattle River Road FR 26. We are therefore unable to get supplies to crews maintaining trails. 86% of the people who commented on your survey want the road repaired vs 2% who do not. How is it that 2% can hold up the repairs? This road was washed out in 2003, 9 years ago!!!!!!		
181. 08/30/12 email	I AM AN ACTIVE MEMBER OF THE TAHOMA B.C.H.W. AND THROUGHLY ENJOY MY TIME SPENT OUT IN THE WILDERNESS ON THE WONDERFUL TRAILS OUR STATE AND FEDERAL GOV. HAVE PROVIDED FOR OUR USE. TO LET A WASHED OUT TRAIL/ROAD GO FOR YEARS WITHOUT REPAIR IS SUCH A SAD STATE OF AFFAIRS FOR OUR COUNTRY. COULD YOU PLEASE NOTE THAT I AM IN FULL AGREEMENT WITH TOTAL REPAIR OF THAT ROAD SO IT IS USABLE BY ALL WHO ENJOY THE OUTDOORS AS MUCH AS I DO. THANK YOU FOR TAKING THE TIME TO READ MY COMMENT AND NOTE MY "VOTE" ON YOUR DECISION.	B	Thank you, your comment is noted.
182. 08/29/12 email	I am a horse owner and ride in the back country. I am also a member of Backcountry Horsemen of Washington. We maintain trails throughout Washington State. We cannot continue to do this without road access to the trailheads with suitable parking areas for trailer towing vehicles. Stock use on the Pacific Crest Trail and on connecting trails accessed for the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trail in the Glacier Peak Wilderness. This route is also used for Search and Rescue operations. It is not enough to restore use for truck/trail combinations to the Green Mountain access trail (Alternative C). We must have full restored access (Alternative B) which includes fixing the Downey Creek and Sulpher Creek bridges and approaches. As a Back Country Horsemen of Washington member, I endorse Alternative B as the only acceptable proposed alternative for pack and saddle stock users.	B	Thank you, your comment is noted.
183. 08/29/12 email	I am a member of Backcountry Horseman and ride my horses in the backcountry! Plan B is the only plan that really works!	B	Thank you, your comment is noted.
184. 08/29/12 email	I am an avid outdoorsman, horse owner and active member of Back Country Horseman of Washington. The chapter of the BCHW that I am a member of is extremely active in keeping trails open on public lands so that they are usable by hikers, bikers and horseman alike. Reasonable access to get to the trail systems we help maintain is critical in us continuing our efforts to keep these trails open. I fully support Alternative B for the full restoration of the Suiattle River Rd. and repair of the associated bridges that give us access to the PCT.	B	Thank you, your comment is noted.
185. 08/29/12 email	I am a horse owner who rides the back country and am a member of the Tahoma Chapter of the Back Country Horsemen of Washington. I support Alternative B, which includes fixing the Downey Creek and Sulphur Creek bridges and approaches, in order to fully restore road access for volunteer groups who help maintain and repair the trail systems. Please choose Alternative B!	B	Thank you, your comment is noted.
186. 08/29/12 email	I support Alternative B. I am a member of the Tahoma Chapter of the Back Country Horseman of Wa. I own one horse and spend as much time every summer as I can riding in the back country.	B	Thank you, your comment is noted.
187. 08/29/12 email	I wish to submit comments to the subject EA in favor of "Alternative B". I would like see every effort be made put out for bid in October and award contract in December 2012, with construction to start in the Spring of 2013.	B	Thank you, your comment is noted.

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	<p>The following are my key comments submitted for the EA dated March 16, 2012:</p> <p>I would like the sites worked in sequence. As they are safe for travel, they be opened for public use. The idea to keep the whole road closed until all work is completed is not serving the public. I have seen roads stay closed for months until a contractor touches up things that pose no public safety issue and very limited affect on the contractor to deal with the public in the area.</p> <p>I think the extension to the Downey creek bridge is complete overkill. The fisheries folks are not reasonable. They are getting there way 100% of the time and loving it. It's time that common sense be applied. The current soft fill material has lasted since the Oct 2003 flood event. With armorong and large culverts would be good solution. But to insists that one grain of silt in the river is too much is not reasonable especially in the Suiattle River. I suggest a temporary ramp be built that bridges the current approach to the Downey Cr bridge (the one at the bridge today is almost car ready). Then a final reasonable solution be developed. Or the user groups that insists on a new 210 foot Downey Cr bridge pay all the added cost without delay.</p> <p>Please repair the Suiattle River road and get it open ASAP!</p>		
188. 08/29/12 email	I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.	B	Thank you, your comment is noted.
189. 08/29/12 email	This road repair has been desired for a long time. It is now time that you folks got off of you binees and repair this road for access to the PCT. We do not need another study on this issue. On behalf of Back Country Horseman	B	Thank you, your comment is noted.
190. 08/29/12 email	I am an avid equestrian, member of Backcountry Horsemen of Washington and utilize the trails of our state's back country. I support Alternate B.	B	Thank you, your comment is noted.
191. 08/29/12 email	I'm writing in response to the subject assessment. My husband and I are avid horseback riders and enjoy and appreciate the wonderful trail system we have here in the Pacific Northwest. We are members of the Backcountry Horsemen of Washington. I would like to pass along my support for Alternate B, as the only acceptable solution.	B	Thank you, your comment is noted.
192. 08/29/12 email	Perinent to the Trail head on Stevens' pass and the Pacific Crest Trail. 1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trail heads along with having suitable parking areas for trailer towing vehicles. 2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations. 3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. 4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users. 5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.	B	Thank you, your comment is noted.
193. 08/29/12	The DOT has learned that 86% of the 400 comments submitted on restoring the Suiattle River	B	Thank you, your comment is noted.

	Date of Comment	Comment	Comment Summary and/or Alternative Preferred ABC	Action Item and/or Response
	email	Road support full restoration, 2% want it closed. This is a primary access to the Pacific Crest Trail, people! Why do are you listening to the 2% that don't use it and not to the 86% that recognize its vital importance? What are your grounds for dallying yet another year by sending out yet <i>another</i> expensive survey? What does the DOT expect to gain? Different answers that more suit its needs? More time to build bridges to nowhere? More money to re-surface roads that the DOT thinks will break down sometime in the next 10 years? This need is now, today! The next major Washington State forest fire may be just around the corner, accessed only by the "once was" Suiattle River Road. What is the public going to think about the DOT <i>then</i> , especially when they will surely know (many will make certain) that it could be fixed <i>now</i> ?		
194.	08/29/12 email	My husband and I are horse owners and like to ride in the back country. We are members of the Back Country Horsemen of Washington (Tahoma Chapter) and do volunteer work on local and back country trails. Regarding the repairs on the Suiattle River Road, we think that <u>Alternative B</u> would be the best plan of action.	B	Thank you, your comment is noted.
195.	08/28/12 email	I am in support of Alternative B for fixing the Suiattle River Road. I am an avid horseback rider and hiker and would like to have this access to the back country restored.	B	Thank you, your comment is noted.
196.	08/28/12 email	As a member of the Back Country Horsemen of Washington, a great deal of our time is spent on trail maintenance and helping to supply groups that are doing major work projects on trails such as the Pacific Crest Trail. In order to carry out these missions, we need access to trail heads. Once again, we are faced with the delay of the Suiattle River Road reconstruction. The results of the public opinion surveys was an overwhelming support for Alternative B. This is a clear indication of the mindset of the people who want and need this road repaired, the longer the delay, the more work to be done. Please understand that trail repair crews count on us for re-supply and our assistance with trail maintenance. These trails are vital to all back country user groups and their enjoyment of the outdoor experience. They are also vital to those agencies whose assistance is needed in emergencies when someone injured needs to be brought out in the most expedient manner or when people become lost in the area and search and rescue personnel need access.	B	Thank you, your comment is noted.
197.	08/28/12 email	Please move forward with this project and get access to the trailheads and trails open as quickly as is possible.	B	Thank you, your comment is noted.
198.	08/28/12 email	I support Alternative B I'm a member of Backcountry Horsemen of Washington	B	Thank you, your comment is noted.
199.	08/28/12 email	I want to submit my support for Alternative B for the Suiattle River Road. I own both a horse and mule and I use them for backcountry riding and camping. I am the President of the Tahoma Chapter of Backcountry Horsemen of Washington and the ~275 individuals who are members of the Tahoma Chapter enjoy riding the backcountry. We would like to see the Suiattle River Road fixed so we can access the backcountry and the Pacific Crest Trail from that trailhead. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. 2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.	B	Thank you, your comment is noted.

Date of Comment	Comment	Comment Summary and/or Preferred Alternative ABC	Action Item and/or Response
	<p>3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p> <p>please fix this vital road for the above reasons. get out and ride like you have never ridden before. no excuses, life comes at you fast and then it is done. </p>		
200.	<p>I am a member with the Back Country Horsemen of Washington. We help maintain trails throughout the state with pack and saddle stock. We cannot make this happen without road access to the trailheads along with suitable parking areas for trucks and trailers.</p> <p>Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>(Alternative C) is not enough. We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users.</p> <p>The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.</p> <p>It's time to "Git er Done"!!!!</p>	B	Thank you, your comment is noted.
201.	Hello, I am writing to you once again to urge that the Suiattle River Road be repaired with all due haste in 2013. Certainly sufficient comments have already been received in support of this repair.	B/C	Thank you, your comment is noted.
202.	<p>Why is there any talk of not fixing this road. It seems like you ask what the people would like they told you but you didn't like what they said? Here are the reasons that many people are saying fix the road!</p> <p>1. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles.</p> <p>2. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations.</p> <p>3. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches.</p> <p>4. Restoration of access for agency and volunteer maintenance of the trail systems must be given a</p>	B	Thank you, your comment is noted.

Date of Comment	Comment	Comment Summary and/or Alternative Preferred ABC	Action Item and/or Response
	top priority if we are to continue providing opportunities in the back country for the current and future generations of users. 5. The Back Country Horsemen of Washington endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users.		
203. 08/28/12 email	Please restore this road to it previous condition and skip all the red tape.	B	Thank you, your comment is noted.
204. 08/28/12 email	I support alternate B. I am a horse owner who rides in the back country of Washington.	B	Thank you, your comment is noted.
205. 08/28/12 email	I am a Back Country Horsemen member. The road in question needs to be open all the way to the end for stock access to the Glacier Peak Wilderness and the Pacific Crest Trail. We cannot adequately assist with trail maintenance if we can't get to the trailhead. We can't get to the trails to recreate if we can't get to the trailhead. The Road needs to be fixed NOW. It is time for the work to be done and to no longer allow a 2% group of people to thwart the needs and wishes of the vast majority of users for this area.	B	Thank you, your comment is noted.
206. 08/28/12 email	Please start immediately to implement alternate B. Fix the road and the bridges now. I am a stock user with the Back Country Horsemen of Washington. We maintain trails throughout the state with pack and saddle stock support. We cannot sustain this effort without road access to the trailheads along with having suitable parking areas for trailer towing vehicles. Stock use on the Pacific Crest Trail and on connecting trails accessed from the Suiattle River Road FR 26 provides the only way to bring in supplies and materials to crews maintaining trails in the Glacier Peak Wilderness. In addition to working and recreational access, this route was used for Search and Rescue operations. It is not sufficient to restore use for truck/trail combinations simply to the Green Mountain access trail (Alternative C). We need full restored access (Alternative B) which includes fixing the Downey Creek and Sulphur Creek bridges and approaches. Restoration of access for agency and volunteer maintenance of the trail systems must be given a top priority if we are to continue providing opportunities in the back country for the current and future generations of users. We endorse Alternative B as the only acceptable proposed Alternative for pack and saddle stock users. 08/22/12 email Please consider my support of ALT B to rebuild the Suiattle River Road to its terminus. Thank you for your consideration, Kent	B	Thank you, your comment is noted.
207. 08/26/12 email	Please reopen the entire road to allow access to the Suiattle River Trail. We are in support of restoring access to the Suiattle River Trail at the end of the Suiattle River Road. This is one of the most scenic trails in the Darrington area and one of the few horse trails available to the local community. My wife and I have ridden this trail every year before the road was closed due to the floods. The trail is a good access point for the Pacific Crest Trail as well as other areas of the Glacier Peak Wilderness. Reestablishing the road for trail access is vitally important for hikers as well as equestrians. Please give us a phone call if you have any questions.	B	Thank you, your comment is noted.
208. 08/26/12	Regarding the amended EA to proposed repairs to the Suiattle River Road, I would like to go on	B	Thank you, your comment is noted.

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	Record as supporting Alternative B. I understand that this option includes repair of all eight damage sites and restores vehicle access to the terminus of the Suiattle Road allowing full Tribal, private, and public access to the sites and areas previously served by the road as envisioned by the planned and intended use of the Suiattle Roads according to the Forest Plan.		
	As more and more primary and spur Forest Service roads are closed, there are fewer opportunities to enjoy the forest whether driving (for those that are unable to hike or bike tens of miles) or hiking (for us day hikers who are unable to hike miles and miles up a closed road before even reaching the trailhead). I fully support re-opening the Suiattle River Road, as outlined in Alternative B, to re-open access to the west side of Glacier Peak watershed and all the trails that are accessed from Road 26.		
209. 08/24/12 email	Thank you for the amended Suiattle River Road EA. It appears the amendments adequately respond to comments on the first version. I support Alternative B because the proposal is a good blend of maintaining access and minimizing environmental impacts. Better stream flow is accommodated in the proposed bridge improvements, existing fill is removed from some sites, and the road relocations are sound proposals.	B	Thank you, your comment is noted.
210. 08/24/12 email	For over 55 years we have been enjoying the Suiattle River area Suiattle trail, 1 lane road, and wooden bridges all the way to the old Sulphur Creek Work Camp & Trailhead. Long before the Glacier Peak Wilderness was established. This road has a long history. It is the only reliable access to the Wilderness from the west side. The public must be allowed to experience this extremely beautiful area. It is the only way to ensure continued wilderness protection. Almost nine years of debate is enough! Therefore we support the alternative that reopens the road all the way to the Sulphur Creek Trailhead. People of all abilities will then be able to participate in this incredible area.	B	Thank you, your comment is noted.
211. 08/23/12 email	I am writing to comment on the closure and/or the re-routing of the Suiattle River Road. Deep in my heart I am an environmentalist I am also an outdoors person. A person who likes to get out and enjoy what our great state of Washington has to offer. And, at the same time to preserve the sensitive environment we have here in the Pacific Northwest. With that said, and what I know, I felt that I needed to comment on the Suiattle River Road closure In August completed the Pramigan Traverse, which exits out of the Suiattle River Road. With the closure it added an approximate additional 10 miles of hiking to get to our car. No big deal, that's what I was expecting. But, my understanding on why the road hasn't been re-opened is because of environmentalist wanting to move the road away from the river. In my opinion the existing road does not affect the flow of the river. Moving it away from the river would affect other areas away from the river and the time required to complete this project would be more, of a detriment by restricting the public from accessing this beautiful area that was once accessible to all. Repairing the existing road would accelerate the opportunity for the public to enjoy this beautiful area. I would support repairing the existing road to make the Downey Creek trailhead available as soon as possible to everyone. Doing this would also save a huge amount of money which as we all know is in short supply. Thanks for the opportunity to make a comment to sensitive issue.	B	Thank you, your comment is noted.
212. 08/23/12	I am in favor of repairing the Suiattle River Road, (Forest Road 26) to the end at Sulphur Creek.	B	Thank you, your comment is noted.

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email	Including making a new road bed where necessary and repairs to bridges and their approaches. This road was probably developed for commercial purposes, but since it is in place gives recreational users easier access to trails and camp grounds. Most people find it hard to find the time to hike the extra miles on the road to the trail heads and stay in the back country for a week end. Unless the road is repaired the elderly will find it impossible to enjoy the camp grounds.		
213. 08/23/12 email	Fix the road-Forest Road 26 and all other necessary repairs to access the area	B	Thank you, your comment is noted.
214. 08/22/12 email	I have looked over the amended FS26 EA. I did not have a chance to comment on the March 2012 EA. I strongly support alternative B, reroute and repair of the road to its end, because with negligible environmental costs it allows the growing Puget Sound recreational community to regain reasonable access to some of the finest trails and camping in the state. I enjoyed this area before the washouts. I have been waiting and waiting for the long-planned repairs to take my family on the Pramigian Traverse and other ventures in the region. Every year I am saddened that this is still held hostage to endless process despite broad public support and available funding for getting the full length of the road reopened.	B	Thank you, your comment is noted.
215. 08/22/12 email	Thank you for the opportunity to comment on the re-construction of FR-26 / Suiattle river road. Having used this road to access Buck Creek campground and other back country recreational areas for over 20 years, I was hoping it would be repaired quickly. Apparently there are some organizations who have worked to kill this project in an effort to keep the public out. I believe one of these groups tried to close highway 20 about 45 years ago for the same reason. I have to ask the question why such small groups that represent a vast minority of back country users are allowed to dictate the outcome of such projects? For over 7 years I have watched an environmental engineer from Lynwood along with the (Audubon society) prevent public access to these areas. To be clear, I do not think it serves any purpose to hike 40 miles round trip to camp at Buck creek which is what these groups are proposing. It is quite apparent that the real goal for such minority groups is to simply close public access to public lands by making them inaccessible. I sincerely hope the state and federal governments can stand up to these groups that represent a very small segment of the population and take action to open this road for the overwhelming majority of the public to once again enjoy.	B	Thank you, your comment is noted.

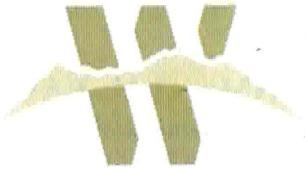
		Date of Comment	Comment	Action Item and/or Response
				Comment Summary and/or Alternative Preferred ABC
216.	08/21/12 email	08/21/12 email	Thank you for your clarification on, "the voting". Will WFLHD and the USFS request the Herald to print a retraction of this story, or at least a correction so that the general public does not think that submitting a comment on the EA was the same thing as submitting a vote? Also, I see reviewing my March 2012 comments that I had commented that the dates for all photographs be dated. Apparently this was not corrected in the AEA.	<p>08/15/12 email from Denise Steele Mr. Lider, The answer to your photo question is in the A-EA as follows: From response number 3 page E-148</p> <p>Response 3: – Cover photo and Figure 2 photos – March 14, 2010 Figure 6 -November 2003 – photo from 2006 EA Figure 7- summer 2007 Figure 8- October 2003 – photo from 2006 EA Figure 9- October 2003 – photo from 2006 EA</p> <p>Regarding the newspaper article: We understand that NEPA decisions are not determined by vote and nothing in the article states otherwise. The use of the word "vote" is used only in the sense of identifying those who indicated a preference for one or the other of the alternatives. It is not used in the sense of what the final decision will be on the project. While FHWA considers all comments and takes into consideration the support or the opposition to a project alternative, such support or opposition is not determinative for the ultimate decision. Decisions on alternatives are not made by "voters" or by "vote." FHWA will make the decision based on a review of all of the comments, the scientific evidence, the continuing need for the project, and other relevant factors</p>
217.	08/21/12 email	08/21/12 email	Fix the damn road already!	B Thank you, your comment is noted.
218.	08/21/12 email	08/21/12 email	Thank you for starting to fix this important road that a few wacko eco freaks chose to protest, they probable haven't been to that beautiful place. I have and want to go back	B Thank you, your comment is noted.
219.	08/20/12 email	My wife and I have previously enjoyed access via the Suiattle River and we prefer that the road be reopened for its entire length.		B Thank you, your comment is noted.
220.	08/20/12 email	It is imperative that the Suiattle River Road be opened for general public use. Having the road closed has created access issues for various groups of people interested in the great outdoors.		B/C Thank you, your comment is noted.
221.	08/20/12 email	It is sad that the majority of people have to suffer for the small mind sets of a few people. The ability of these few people to stop progress for so long on the river road, or any road for that matter, is seriously flawed. There should be a short time period for concerns and a final decision with no further discussion. If the decision was flawed then make corrections next time. I am now 63 years old and have been waiting for this road to be opened for years. Our family was planning a hiking trip over Suiattle Pass when the road was damaged. No problem, they'll get it fixed soon. I am now not in the physical health to make the trip and the family has lost interest due to the lack of action on the Forest Service's part. Everyone can point fingers but the FS has too many employees that side with the obstructionists and not enough people committed to serve "all" the people that they are hired to serve. It is a sad day in America when so many government employees, costing so much in salaries to employ, spend so much time accomplishing nothing. Just think of how many tax dollars have been wasted over these years with nothing to show for it. The saddest part is the fix, if it ever is accomplished, will be a low budget fix and will wash out at the next high water. And people wonder why voters are a little upset. My vote is to open the road for God's sake, open		B/C Thank you, your comment is noted.

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222.	I am interested in seeing the road opened completely from beginning to end. I haven't been up there since I hiked to Kennedy Hot Springs while in Boy Scouts in the Mid 1980's. I'd like for my children to experience the beauty of that area. As I'm getting older, it is more difficult for me to hike into these back country areas. The more of these forest roads close, the less access I have to enjoy areas that I once did as a youth. Please consider this my vote on completely repairing the road. Thanks for the time you are taking to get this right.	B	Thank you, your comment is noted.
223.	Please open the Suiattle River Road using plan B.	B	Thank you, your comment is noted.
224.	Please Please Please open Suiattle River Road.	B/C	Thank you, your comment is noted.
225.	I just want to thank you for getting through this, and working to repair the road at last. I understand the environmental concerns, but this is a major access route to the back country, and there are many of us who sorely miss being able to hike near Glacier Peak. We really appreciate the fact that you are repairing the road!	B	Thank you, your comment is noted.
226.	The only things that belong in the middle of the road are dotted yellow lines and dead armadillos.		Thank you, your comment is noted.
227.	The proposed project to rebuild the Suiattle River Road should be allowed to go forward and this road should be reopened. The road is on flat, forested terrain and not on any fragile alpine environment. It serves as an important access to trails into a wilderness area. For most people, the road closure means that it is impossible for them to travel into this wilderness area. For those less adventurous souls the road allows them to go for a drive and take short hikes along the Suiattle River. The small amount of environmental damage caused by allowing this road to be reopened is far outweighed by the benefits of doing so.	B	Thank you, your comment is noted.
228.	i still support alternative B. please open the road up to its former entirity, if n3c pushes another lawsuit or requests another alternative EA. i suggest a counter lawsuit. this is ridiculous and wasting tax payers dollars. they are going to keep this up indefinitely until there are financial repercussions against their baseless actions. and each time, instead of having funding to maintain roads, the FS will have to waste its (our) money to fight it. redo an EA, etc. wilderness is reclaiming itself readily enough in the glacier peak area. please keep this road open to help us enjoy it for generations more.	B	Thank you, your comment is noted.
229.	08/15/12 email from Denise This is not a redo where the past input is not considered. The decision maker will consider all the information gathered. This is a process to continue to keep the public informed and involved. 08/15/12 email	B	Thank you, your comment is noted.
	Thank for sending the amended Suiattle EA. My question: Is this a redo where folks choices on what option to do from previous EA are not considered. Or will the choices on what folks wanted in the previous EA be considered. With 90% of the folks wanting Alternative B before, I don't want those not to count. As we know many want all roads up long river valley removed, like they did on the Whitechuck.		
230.	PLFASE repair the Suiattle River Road so it can be open for public use once again! I have read the proposal and feel the environmental impacts will be minimal in fixing this road. I hope this	B	Thank you, your comment is noted.

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231.	08/14/12 email Proposal is approved quickly, so work can be started ASAP. We miss hiking up Green Mtn and into the Glacier Peak area! THANKS!	B	Thank you, your comment is noted.
232.	08/13/12 email It is vital to our area that the repairs be made to this road. My husband and I are both fourth-generation Snohomish County residents, and our children and grandchildren live here also. This road will be used and enjoyed by all of us who live here and will help to support the residents by encouraging tourists. Not all of our people are physically able to hike, yet have a right to enjoy the forests and rivers of our area.	B	Thank you, your comment is noted.
233.	08/10/12 email Please be assured I am in complete support of re-establishing road 26 to the extent it provides access to the upper trail system and campgrounds, for the vast recreational users who wish to partake in that area. If it means constructing it away from the flood plane, so be it.	B	Thank you, your comment is noted.
234.	08/10/12 email I'm all for doing the repair work, thanks.	B	Thank you, your comment is noted.
235.	08/9/12 email I support the opening of Suiattle Road 26 and look forward to the ability to access that area again.	B	Thank you, your comment is noted.
236.	08/9/12 email I support Alternative B (Repair Road 26 at all 8 sites, with relocations away from the river, and rehabilitation of abandoned sections of Road 26). I have used Road 26 in the past to access the Suiattle River Trail and plan to do so again as soon as this road is reopened.	B	Thank you, your comment is noted.
237.	08/9/12 email I would like to voice my full support for Alternative B in the Suiattle River Road Amended Environmental Assessment. We have been without access to the trailheads of the upper Suiattle for far too long! I have two young boys that I would love to take up to these fantastic hiking areas, and it will be much too far for them to walk if Alternative A or C are chosen. Please fix the full length of the road and restore access to the Suiattle.	B	Thank you, your comment is noted.
238.	08/9/12 email I have, with many others, camped at Sulphur Creek about eight times. I am very familiar with the road prior to washout. On one occasion I caught an 18 inch Dolly in Sulphur Creek. Some of my friends are now deceased but my memories of them are closely tied to our experiences at Sulphur Creek. I am 81 years old and would dearly like to make at least one more trip with those who survive. For two years in the early 60's I was a trail foreman for the USFS at Skykomish. For the next two summers I was powder monkey and foreman in the absence of the contactor in a reroute of the Crest Trail around Surprise Mountain. Later, In the 70's I worked for Robert Norton as an assistant to his role as the Trail Engineer for the Baker/Snoqualmie National Forest. I have lived the forest and I've worked the forest. Please give us back Sulphur Creek.	B	Turn to trail Thank you, your comment is noted.
	08/9/12 second email One other note. This is how many times the Suiattle road has had to be repaired. 1974 - 2003 Major flood damage on Road 26: Fourteen floods qualify as Emergency Relief for Federally Owned Roads (EFRO) in 1974, 1977, 1979, 1980, 1982, 1984, 1989, 1990, 1991, 1994, 1995, 1996, 1999 and 2003. Total of 39 damaged sites in seven of these floods. 08/9/12 email The Suiattle river road should be turned into trail usage. This is a waste of money and an unnecessary environmental impact to the Suiattle valley. We've repaired this road before and will have to do it again. Along with maintenance cost and vehicle pollution the elimination of this road and converting into trail is a beautiful way to protect the Glacier Peak ecosystem. By closing this road you save money and expand endangered and threatened species habitat.		86

		Date of Comment	Comment	Comment Summary and/or Alternative Preferred ABC	Action Item and/or Response
239.	08/9/12 email		Do not repair road. Do convert into trail usage. Spend money to create a portal area and interpretive center.. I am for anything that gets that road up the Suiattle open again! My 67 year old body would like to hike the trails of my youth, so get that road drivable again I'm not going to see that country again unless you open that road. I'm guessing that some people are going to argue to keep people like me out of the area. As a third generation Washingtonian let me say that I am for KEEPING this area accessible.	B	Thank you, your comment is noted

**APPENDIX C LETTER FROM WESTERN ENVIRONMENTAL LAW
CENTER WITH RESPONSES**



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Southwest
Taos, New Mexico

Northern Rockies
Helena, Montana

Southern Rockies
Durango, Colorado

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Western Environmental Law Center

September 20, 2012

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Western Federal Lands Highway Division
Federal Highway Administration
610 East Fifth Street
Vancouver, WA. 98661-3801

Ms. Jennifer Eberlien, Forest Supervisor
Mt. Baker-Snoqualmie National Forest
United States Forest Service
2930 Wetmore Ave., Suite 3A
Everett, WA. 98201

Mr. Ken Berg, State Supervisor
Washington Fish and Wildlife Office
United States Fish and Wildlife Service
510 Desmond Drive SE, Suite 102
Lacey, WA. 98503-1263

RE: Significant New Information Regarding Northern Spotted Owls and the Suiattle River Road Project (WA FS ERFO 071-2023)

Dear Acting Director Coe, Forest Supervisor Eberlien, and State Supervisor Berg:

I am contacting you on behalf of Pilchuck Audubon Society and Mr. William Lider. I wish to bring to your attention significant new information regarding the acute and long-term effects of vehicle exposure on the physiology and reproductive success of the northern spotted owl.

A recent study has come to our attention that may affect the conclusions reached in Federal Highway Administration's (FHWA) environmental assessment documenting proposed repairs to the Suiattle River Road on the Mt. Baker-Snoqualmie National Forest in Washington, as well as United States Fish and Wildlife's (FWS) consultation on the same project.

In June 2011, the Ecological Society of America published the attached peer-reviewed study, Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl. According to the abstract for the article,

Stress physiologists posit that multiple simultaneous demands faced by an organism may have non-additive effects on the magnitude of their response to disturbance. The

environmental assessment literature emphasizes a similar phenomenon at the population level, arguing that populations can compensate for perturbations up to a threshold, beyond which disturbance impacts may be greatly magnified—and even cause system collapse. We integrated these two approaches to examine the roles of environment, life history stage, prior disturbance experience, and their interactions on vulnerability to disturbance in a free-living species. Specifically, we examined the effects of off-highway vehicle use on the federally threatened northern spotted owl (NSO), *Strix occidentalis caurina*, by measuring fecal glucocorticoid metabolites (fGCs), which reflect disturbance; fecal thyroid hormone metabolites (fT3), which reflect nutrition; and the number of offspring fledged within a season. We experimentally applied one hour of motorcycle exposure to NSOs during periods of incubation (May) and fledging (July), comparing fGC levels of treated NSO with those of non-exposed controls. Acute vehicle exposure generally increased fGCs in the short term. Males showed the highest glucocorticoid response to vehicle disturbance in May when they were typically solely responsible for feeding themselves, their mates and their nestlings. By contrast, response to motorcycle exposure among females depended on their level of fT3 and their number of young. Levels of fGCs were highest post treatment among females that lacked young and had high fT3 (good nutrition); fGC levels were lower in treated females compared to controls among females with two young and low fT3 (compromised nutrition), possibly reflecting allostatic overload. The correlational approach showed that NSO close to roads had higher levels of fT3, suggesting better nutrition. Surprisingly, fGC levels were unrelated to proximity of roads, irrespective of noise. Presumably, the tendency for traffic exposure to increase fGCs over the long-term was offset by nutritional gains (i.e., reduced fGCs and high fT3) associated with proximity to roads. Sound level meters enabled us to quantify road noise on a subset of NSO territories. NSO close to noisy roads fledged significantly fewer young than NSO near quiet roads, indicating that routine traffic exposure may decrease NSO reproductive success over time.

The Suiattle River Road Project on the Mt. Baker-Snoqualmie National Forest proposes to reconstruct several sections of the road that washed out in storms in 2003 and 2006/2007. FHWA prepared an amended environmental assessment (AEA) for the project in August 2012; FWS completed consultation on the project via programmatic biological opinions in 2002, 2006, 2007, 2009, and 2011 (USFWS Ref. Nos. 13410-2006-F-0015 and 1-3-02-F-1583).

Neither the amended environmental assessment nor the consultation documents for the Suiattle River Road Project address this study or the core of the findings, i.e., that the proximity of roads to northern spotted owls is directly related to the feeding and reproductive success of the species. For example, the Suiattle AEA states that “noise disturbance on roads for decommissioning or storage is similar to road maintenance, and is of short-term duration.” Suiattle AEA, 133. In contrast, the study explains that “proximity to road noise significantly affected reproductive success. NSO within 100 m of quiet roads fledged more young than NSO further from roads (within a range of 800 m). In contrast, NSO within 100 m of loud roads fledged fewer young. For owls within 100 m of a road the association of high noise and reduced reproductive success is strong.” Hayward et al., 11.

As you are aware, “the purpose of NEPA is to foster better decision making and informed public participation for actions and affect the environment.” *Or. Natural Res. Council Action v. U.S. Forest Service*, 293 F.Supp.2d 1200, 1204 (D. Or. 2003) (“ONRC”) (citing 42 U.S.C. § 4321; 40 C.F.R. § 1501.1(c)). “It ensures that the agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impacts; it also guarantees that the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision.” *Friends of the Clearwater v. Dombeck*, 222 F.3d 552, 557 (9th Cir. 2000) (quoting *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349, 109 S.Ct. 1835 (1989)).

“Stated differently, NEPA’s purpose is to ensure that ‘the agency will not act on incomplete information, only to regret its decision after it is too late to correct.’” *Id.*

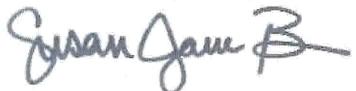
“In view of this purpose, an agency that has prepared an EIS cannot simply rest on the original document. The agency must be alert to new information that may alter the results of its original environmental analysis, and continue to take a ‘hard look at the environmental effects of its planned action, even after a proposal has received initial approval.’” *Friends of the Clearwater*, 222 F.3d at 557 (quoting *Marsh* 490 U.S. at 374); *Blue Mountains Biodiversity Project v. U.S. Forest Service*, 229 F.Supp.2d 1140, 1148 (D. Or. 2002). Indeed, when a “major federal action” remains to occur and the initial NEPA document does not adequately discuss “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts,” then the action agency is required to supplement the existing environmental analysis. 40 C.F.R. § 1502.9(c)(1)(ii); *Marsh v. Or. Natural Res. Council*, 490 U.S. 360, 374 (1989); *Marsh v. Or. Natural Res. Council*, 490 U.S. 360, 371, 374 (1989); *Or. Natural Res. Council Action v. United States Forest Serv.*, 2004 U.S. Dist. Lexis 59034, 24 (D. Or., Aug. 9, 2006).

Given the importance of ensuring the recovery of the threatened northern spotted owl, we wished to bring this significant new information regarding the effects of motorized vehicle use on the owl to your attention. We believe this information is directly relevant to the environmental consequences of the Suiattle River Road Project, and may change the effects determinations reached by FHWA, Forest Service, and FWS. To that end, we request that the action and consulting agencies conduct supplemental environmental analysis regarding the effects of the Suiattle River Road Project on northern spotted owls from reconstruction, operation, and maintenance of the Suiattle River Road. *Seattle Audubon Soc. v. Espy*, 998 F.2d 699, 704 (9th Cir. 1993) (an agency must re-examine its decision when the EIS “rests on stale scientific evidence... and false assumptions”).

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/// /// ///

If you have any questions about this letter, please do not hesitate to contact me.

Sincerely,



Susan Jane M. Brown, Staff Attorney
Western Environmental Law Center
Phone: 503-914-1323
Cell: 503-680-5513
brown@westernlaw.org
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United States
Department of
Agriculture

Forest
Service

Mt. Baker-Snoqualmie
National Forest
Supervisor's Office

2930 Wetmore Avenue, Suite 3A
Everett, WA 98201
(425) 783-6000

File Code: 1950/2670
Date: October 30, 2012

Ms. Susan Jane M. Brown
Staff Attorney
Western Environmental Law Center
1216 Lincoln Street
Eugene, OR 97401

Dear Ms. Brown:

This responds to your correspondence of September 20, 2012, regarding spotted owl information and the Suiattle River Road Project (WA FSERFO 071-2023). You contacted the Forest Service, the Western Federal Lands Highway Division, and the U.S Fish and Wildlife Service (FWS) with a request that based on new information (2011 noise study), the action and consulting agencies conduct supplemental environmental analysis regarding the effects of the repair, operation, and maintenance of the Suiattle River Road on the northern spotted owls.

The MBS has reviewed your correspondence, along with the information in the 2011 *Hayward et al.* study, the Suiattle Road 26 Amended Environmental Assessment (AEA), and the Section 7 consultation record for the Suiattle River Road Project. The AEA and the consultation record support the spotted owl effects determination for the repair, operation, and maintenance of Road 26. At this time, an additional supplemental environmental analysis would be unlikely to provide a different effects determination. Therefore, a supplemental analysis of the Suiattle River Road Project for effects to spotted owl is not warranted.

The attachment addresses your request in detail.

Sincerely,

JENNIFER EBERLIEN
Forest Supervisor

Enclosure

cc: Brent Coe, Acting Director of Project Delivery, Western Federal Lands Highway Division
Ken Berg, State Supervisor, U.S. Fish & Wildlife Service



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Response to Western Environmental Law Center Correspondence
Mt. Baker-Snoqualmie National Forest - 10/30/12

This response addresses correspondence of September 20, 2012 from the Western Environmental Law Center, regarding spotted owl information and the Suiattle River Road Project (WA FSERFO 071-2023). The letter to the Forest Service, the Western Federal Lands Highway Division, and the U.S Fish and Wildlife Service (USFWS) requested that based on new information (2011 noise study), the action and consulting agencies should conduct supplemental environmental analysis regarding the effects of the repair, operation, and maintenance of the Suiattle River Road on the northern spotted owls.

U.S. Forest Service staff continues to update the information database used in making effects determination for federally listed species in Section 7 Endangered Species consultation. In determining spotted owl effects, new information such as the 2011 noise study (*Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl* [L. Hayward, et al. 2011]) is being considered along with previous papers. The 2011 study is a continuation of studies (Wasser et al., 1997)¹ that examine effects on species' fecal thyroid hormone metabolites and glucocorticoids as a measure of stress from disturbance activities.

The 2011 study by Hayward et al. suggests that disturbance from traffic can have a substantial impact on fitness of the northern spotted owl (NSO). While the study did find an increased level in the fecal thyroid hormone metabolites and (fecal glucocorticoids, or fGCs) of owls closer to roads and subject to acute noise levels, there was not a clear link of noise levels to NSO population dynamics of fitness or reproductive success. Reproduction of wildlife species is influenced by a variety of multiple interacting factors. The decrease in NSO reproduction reported in the study in association with roads was not necessarily normalized for other variables such as changes in habitat quality, prey base, weather conditions, predators, and competitors such as the barred owl, all of which may interact and also influence NSO reproduction success. The 2011 study findings were specific to the conditions of the individual study, and therefore, the study conclusions may not be directly comparable to the project-specific situation of the Suiattle Road.

The 2011 experiment used street-legal motorcycles equipped for long-distance cross-country competition ("Enduro" races) to examine effects of off-highway vehicle use on the NSO. Motorcycles (with up to 96 decibels [dB]²) simulated acute noise exposure by being ridden back and forth for one hour along an approximate half mile stretch of road close to the owls' roost or nest sites. Motorcycles are frequently listed as having a noise level at 90 to 92 decibels (dB) while passenger vehicle traffic on a rural road is listed in the range of 45 to 50 dB³. A highway department noise level chart explaining the difference in decibel detection levels classifies a change of 3 dB or less as not noticeable to the human ear, while a change of 5 dB is noticeable, and a change in 10 dB would be twice as noticeable (perceived as "twice as loud"). So there is a considerable difference between an hour of motorcycle noise (90 dB), and background road noise (45 to 50 dB) expected on a rural forest road. Given the high dB level of motorcycles, it is not surprising that the study found an acute raised level of fecal glucocorticoids (fGCs, the

¹ Wasser, S.K., K.R. Bevis, G. King, and E. Hanson. 1997. Noninvasive physiological measures of disturbance in the northern spotted owl. *Conservation Biology* 11(4):1019-1022.

² See http://www.trailandenduro.com.au/useful_stuff/noise.html

³ See WSDOT document at <http://www.wsdot.wa.gov/Environment/Biology/BA/default.htm#Noise>

hormones most often measured in disturbance studies) in “Enduro” treated birds. But there is not a clear association demonstrated of elevated fGC levels with routine forest road traffic. In fact, Hayward and others (2011) concluded that the road proximity to nest sites and the noise level of roads was not correlated with the baseline fGC levels of owls on those nests.

Another question with the 2011 study is the lack of description of routine road traffic noise levels. Both control and treatment sites in the 2011 study were located in areas described as ranging from high to low routine off-highway vehicle use, but there is not a description of routine road traffic in forest settings. The 2011 study reported that overall, spotted owls have an increased fCG response to acute traffic exposure, and state that this finding is consistent with the Wasser et al. (1997) study of elevated hormone levels found in male NSO with territories close to roads in Washington. The traffic in the Wasser 1997 study entailed major logging roads, with the study examining differences in fGCs from spotted owls within and beyond 0.41 km (0.25 mile) of major logging roads. The 1997 study report did not include a description of level of activity or noise level on the logging roads. Without additional description of the decibel levels of the logging road scenario of the Wasser et.al 1997 study and the control roads in the 2011 study, it is difficult to ascertain how the acute noise attributed to those roads compares with the forest road situation of Road 26.

The distinction between loud and quiet roads was thought to be influential in determining potential impacts on spotted owl reproduction success and fitness. The 2011 study reported that NSO within 100 meters of quiet roads fledged more young than NSO further from roads⁴, while NSO within 100 meters of loud roads fledged fewer young. The study recorded very few actual failed nesting attempts, and appears to include single owls and non-reproducing owl pairs with failed nest attempts. Additional review of the raw data and how single and non-reproducing owls were accounted for in the study may show no significant difference in failed nesting attempts adjacent to noisy roads. The 2011 study also noted that the measure of the relationship between fGCs and fitness is not always significant or consistent, and that effects on survival and reproductive success are rarely quantified. An example was given of a study by Creel et al. (2002), which reported an association between exposures to snowmobiles and elevated fecal glucocorticoid metabolites in wolves and elk, but the study found no evidence of an effect of traffic on population dynamics.

In the case of the 2011 study, Mount-Baker Snoqualmie (MBS) National Forest staff have taken a hard look at the information and at the environmental effects of the planned action. The new information would not alter the spotted owl effects determination previously consulted on with the USWS for the Road 26 repairs. The repairs were assessed as having a “may effect, likely to adversely affect spotted owls,” due to the noise disturbance from the proposed road repair activities.⁵ This effect determination is consistent with studies of acute noise disturbance described in the 2002 Forest Programmatic Biological Assessment and Biological Opinion.⁶

⁴ The 2011 study in Northern California suggested that owls near roads have access to more prey (such as wood rats) near roads.

⁵ See the Suiattle River Road Project, AEA (2012), Chapter 3 pages 130 to 134 for spotted owl effects determination; and Chapter 4 of the AEA for the consultation history of the Suiattle Road 26 Project.

⁶ Staff members of the MBS are currently engaged in updating the Mt. Baker-Snoqualmie (MBS) Nation Forest's Programmatic Biological Assessments (BA) for forest management activities with the effects determination of those activities on federally listed species. The updated programmatic BA is not yet finalized, but new information in the

Noise disturbance on Road 26 following repairs would include road maintenance, which is covered in the cumulative effects determinations found in Chapter 3 of the August 2012 Suiattle River Road Project, Amended Environmental Assessment (AEA). The referenced road maintenance in the AEA is under Section 7 consultation in separate consultations with the Forest Programmatic Biological Assessment / Biological Opinion. Noise disturbance from the resumption of traffic on Road 26 is a concern previously raised by Pilchuck Audubon Society (PAS) in comment letters under NEPA. The letters raised the concern that neither the amended environmental assessment nor the consultation documents for the Suiattle Road Project addressed the operation, maintenance, and resumption of traffic on Road 26.

These comments are provided along with agency response below.

PAS Comment: *There is absolutely no mention on the referenced pages of the effects that resuming and ongoing auto traffic would have on wildlife, air and water quality, noise pollution, endangered fish populations, etc.*

Agency Response: While the environmental consequences of construction activities and resulting impacts are discussed for all resources in Chapter 3 - Environmental Consequences, specific description of resumption of ongoing traffic was targeted to species or resources that would be influenced by the resumption of traffic. See the AEA, pages 138 to 139, for grizzly bear effects, pages 140 to 141 for wolverine effects, and Wildlife Forest Plan consistency on pages 142 to 143 (includes cumulative effects) for wildlife effects. Effects on air quality from resuming traffic are described in the AEA on pages 153 to 154, and water quality effects are described in the AEA on page 106. Fisheries effects from resuming traffic listed potential poaching scenarios in the AEA on pages 74 to 79. The USFS consultation used both stand-alone formal and programmatic Biological Assessments with corresponding Biological Opinions.

PAS Comment: *The noise of ongoing traffic is not considered in the EA. The example given of a marbled murrelet nest near US 101 is not an equivalent situation, since this busy highway represents ongoing, relatively constant traffic, which is not the same as intermittent automobile noise.*

Agency Response: Disturbance effects relative to background levels of disturbance (such as on-going traffic) are a part of the effects assessment in the Forest Programmatic Biological Assessment. The information in this assessment is utilized in project consistency forms and stand-alone, formal Biological Assessments which were part of the Section 7 Consultation for the Suiattle Road 26 project.

The Forest Programmatic Biological Assessment (2002) considers: (1) The type of data available concerning disturbance of murrelets, (2) the best available information concerning disturbances to murrelets due to researchers, vehicles, loud noises, aircraft and pedestrians near the nest not due to research, (3) disturbances of birds in other water-oriented taxonomic orders, (4) rationale behind setting of detectability, alert, disturbance for various activities covered in the Biological Opinion for the Forest, (5) the likelihood of injury due to these activities, and (6) the best-

updates is utilized in current project assessments and excerpts on noise disturbance to marbled murrelets and spotted owl. New information is provided in the Addendum, attached to this paper

available information concerning disturbance of birds other than murrelets (MBS Programmatic BA, 2002; pp. 62-63; 75-76).

The Forest Programmatic BA describes murrelet (and spotted owl) harassment most likely to occur under three situations: (1) noise is so loud that it interrupts and/or precludes essential behavior, (2) a noise and/or visual stimulus is in such close proximity to the nest that the activity is perceived as a threat and causes flushing from the nest or missed feedings, and (3) noise is loud and sudden, has rapid onset, thereby causing startled – flush response. Background forest road traffic (typically levels around 45 to 50 dB (cumulative sound exposure level [SEL] or lower) is considered within background ambient noise levels for Forest Service Level 3-5 roads and does not lead to murrelet or owl harassment as described above.

The USFS has reviewed the information in the 2011 Hayward et al. study, the Suiattle Road 26 AEA, and the Section 7 consultation record for the Suiattle River Road Project. The AEA and consultation record support the spotted owl effects determination for the repair, operation and maintenance of Road 26. At this time, it is unlikely that additional supplemental environmental analysis would produce a determination of different effects. Therefore, a supplemental analysis of the Suiattle River Road Project for effects to spotted owl is not warranted.

Addendum 10/30/12:
Excerpts from Updates (In Progress) to MBS Programmatic BA on Noise Effects (2009)

As related to murrelets, the attempt to quantify adverse effects by estimating various injury thresholds as some number of dBA above ambient and background levels would necessitate estimating both the ambient/background levels and the project-specific sound levels at every location for every project. This would be cost-prohibitive and is not warranted at this time. The USFWS estimates these sound-only levels to be: 40 dBA for ambient; 44 dBA for the detection threshold (sight or sound is detectable to a murrelet but there is no apparent response); 57 dBA for the alert threshold (interest is shown in the sight or sound); 70 dBA for the disturbance threshold (avoidance of sight or sound, no injury); 82 dBA for the non-aircraft injury threshold (injury (harassment) by the sight or sound); and 92 dBA for the aircraft injury threshold. Information from surveys and research on marbled murrelets and their reaction to typical occurrences and activities that are both seen and heard, is used as an initial attempt to make injury-distance thresholds for murrelets.

It may be possible that owls may not react visibly to a disturbance, but are producing increased levels of corticosterone in reaction to the disturbance. Corticosterone is released by the hypothalmo-pituitary-adrenal gland to help animals respond to environmental stress. It is hypothesized that chronic high levels may have negative consequences on reproduction or physical condition (Marra and Holberton 1998). Waser et al. (1997) measured corticosterone levels in feces of northern spotted owls within and beyond 0.41 km (0.25 mile) of heavily used logging roads and/or forest management activities, and between areas of clearcut and selective harvests. The study found statistically significant elevated corticosterone levels in owls within 0.41 km of forest management activity, and in proximity to clearcuts for male owls only; no differences were noted for females. Sample sizes were admittedly small. Hayward et. al. (2011) examined effects of off-highway vehicle use (motorcycles fitted for Enduro cross country competition) on northern spotted owls, and reported acute vehicle exposure (<96 decibels) generally increased fecal glucocorticoid metabolites (fGCs) in the short term. Whether such elevated levels of corticosterone actually result in adverse effects to owls is undetermined.

The MBS has chosen to be conservative in past consultations, in that it has applied the assumption that these typical Forest activities could cause harassment. There is no data to indicate that activities described in the Project Descriptions section have actually caused harassment of spotted owls or marbled murrelets. Further, hundreds of scientific observers engaged in protocol survey can attest to the owls' apparent, and typical, lack of apprehension during close encounters with humans and their vehicles. However, due to a lack of statistically sound observations of these phenomena and an assumption that spotted owls may suffer from increased, detrimental increases in corticosterone levels without flushing from the nest or perches, it is assumed that some harassment by these activities can occur. If murrelet physiology and behavior is similar to gulls, spotted owls, and mockingbirds, then it is possible that adult murrelets and late-stage nestlings could produce elevated levels of corticosterone in response to disturbances. However, whether such elevated levels of corticosterone would result in adverse effects on murrelets is unknown.

Wasser, S. K., K. Bevis, G. King and E. Hanson. 1997. *Noninvasive physiological measures of disturbance in the Northern Spotted Owl*. Conservation Biology 11:1019-2022.

Marra P. P. and R. L. Holberton. 1998. *Corticosterone levels as indicators of habitat quality: effects of habitat segregation in a migratory bird during the non-breeding season*. Oecologia 116:284 ± 292.

Hayward, L. S., A. Bowles, J. C. Ha, and S. K. Wasser. 2011. *Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl*. Ecosphere 2(6):art65. doi:10.1890/ES10-00199.1



U.S. Department
of Transportation

**Federal Highway
Administration**

Western Federal Lands Highway Division
610 E. Fifth Street
Vancouver, WA 98661
Phone 360-619-7700
Fax 360-619-7846

October 30, 2012

In Reply Refer To: HFL-17

Susan Jane M. Brown
Staff Attorney
Western Environmental Law Center
1216 Lincoln Street
Eugene, OR 97401

Re: Suiattle River Road Effect of Road Noise

Dear Ms. Brown:

Thank you for your September 20, 2012 letter bringing the study (*Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl* [L. Hayward, et al. 2011]) to our attention. We have reviewed the information, together with the Mount Baker-Snoqualmie Forest Service (USFS), and find the article adds to the base of knowledge about the effect of road noise on wildlife.

The USFS completed Section 7 consultation with the U.S. Fish and Wildlife Service (FWS) for noise disturbance effects as per the discussion in Chapter 3 and Chapter 4 of the Federal Highway Administration 2012 Suiattle River Road Amended Environmental Assessment (A-EA). Chapter 4 the A-EA describes the consultation efforts with the FWS using both formal consultation under a Biological Assessment and Biological Opinion in 2009, and the Five-Year Programmatic Biological Assessment for Forest Management. The FWS found the actions proposed with mitigation measures as written within the A-EA are consistent with the Biological Opinion dated February 10, 2010 and the February 12, 2010 concurrence letter associated with the August 10, 2009 U.S. Forest Service Biological Assessment. It is our understanding that the USFS has coordinated with the FWS via Level 1 consultation processes since the receipt of your letter.

We have considered the detailed response by the USFS and concur with their findings.

Sincerely yours,

Brent Coe
Acting Director of Project Delivery
Western Federal Lands Highway Division

DES/mcb

cc: Jennifer Eberlien, Forest Supervisor, Mount Baker-Snoqualmie Forest, WA
Ken Berg, State Supervisor, US Fish & Wildlife Service, WA



United States Department of the Interior

FISH AND WILDLIFE SERVICE



Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

NOV - 7 2012

Susan Jane M. Brown
Western Environmental Law Center
Northwest – Headquarters
1216 Lincoln Street
Eugene, Oregon 97401

Dear Ms. Brown:

Subject: U.S. Forest Service, Mt. Baker-Snoqualmie National Forest, Suiattle River Road Project

We received your September 20, 2012, letter concerning the Suiattle River Road Project (WA FS ERFO 071-2023) on September 24, 2012, with carbon copies to Brent Coe of the Federal Highway Administration (Western Federal Lands Highway Division), and Jennifer Eberlien of the Mt. Baker-Snoqualmie National Forest. Your letter referenced a paper by Hayward et al. (2011) concerning a study conducted on northern spotted owls (*Strix occidentalis caurina*) (spotted owl) in northern California and stated that the information within the paper is directly relevant to the environmental consequences of the Suiattle River Road Project and may change the effects determinations reached by the Federal Highway Administration, the U.S. Forest Service, and the U.S. Fish and Wildlife Service (Service). The Western Environmental Law Center requested that the action agency and consulting agencies conduct supplemental environmental analysis regarding the effects of the Suiattle River Road reconstruction, operation, and maintenance. After careful consideration of the project, the status of the spotted owl, and the referenced articles, we have concluded that additional analysis on the part of the Service is not warranted. Our rationale for this decision is listed below.

Hayward et al. (2012) found that spotted owls exposed to one-hour of continuous motorcycle noise in close proximity (5 to 800 m) to their nests or roosting locations had elevated levels of fecal glucocorticoids (fGCs) which reflect a potential stress response in spotted owls. The authors also found that spotted owls nesting in close proximity (within 100 m) to “loud” roads have decreased reproductive success compared to spotted owls that nested within 100 m of

“quiet” roads concluding that routine traffic exposure may decrease spotted owl reproductive success over time. The correlation of proximity to “loud” roads and apparent reduced nesting success in spotted owls noted by the authors raises questions concerning the potential effect that road noise has on spotted owl productivity. However, the author’s conclusion that there is a “strong association” of decreased reproductive success near loud roads requires further analysis to support this conclusion.

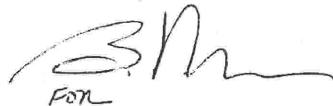
Spotted owl reproduction is a complex interaction between age, prey abundance, weather, individual variation, and territory quality (Forsman et al 2011, p. 59). Numerous studies have demonstrated that the amount and configuration of habitat within a territory influence spotted owl reproduction (Franklin et al. 2000, Olson et al. 2004, Dugger et al. 2005). Reproductive rates are also influenced by parent age, previous breeding experience, amount of precipitation during the nesting season, and the presence of barred owls (*Strix varia*) (Olson et al. 2004, Dugger et al. 2005, Glenn et al. 2011). All of these various factors have been demonstrated to influence spotted owl productivity.

The correlation that spotted owls appear to have reduced nesting success adjacent to “loud” roads noted by Hayward et al. (2012) is interesting, but the authors provide no further context or analysis to explain why spotted owls adjacent to roads may be less successful. To truly demonstrate that proximity to roads is a significant factor influencing spotted owl productivity, the study design would need account for the other factors that affect spotted owl reproduction. If the Hayward experiment had been able to demonstrate that with all else being equal, spotted owls nesting near roads have lower nest productivity than spotted owls nesting further from loud roads, the findings in the paper would be compelling. Without this further analysis, there is relatively little that can be concluded from this research other than the fact that spotted owls exposed to motorcycle noise have elevated levels of fGCs which reflect a potential disturbance or stress response. Whether this response is indicative of a significant physiological effect is unknown, as the authors did not find that spotted owls with elevated fGCs had reduced nesting success, did not find that spotted owls near roads had higher baseline fGCs, and noted (p. 12) that “elevated baseline GCs can be positively, negatively, or not associated with survival and/or reproduction...”

In conclusion, it is our opinion that the referenced paper does not provide new information that would justify supplemental environmental analysis regarding the effects of the Suiattle River Road reconstruction, operation, and maintenance on the part of the Service. Also, we have reviewed an early draft of the U.S. Forest Service’s response to the same request from the Western Environmental Law Center. We support their analysis of the study and their conclusion that additional analysis for the referenced project is not warranted.

We appreciate your concern for endangered species and the habitats on which they depend. If you have any further questions regarding the referenced project or the role of the U.S. Fish and Wildlife Service, please contact Carolyn Scafidi (360) 754-4068 of the office.

Sincerely,



Ken Berg, Manager
Washington Fish and Wildlife Office

cc:

USFS, Darrington, WA (P. Reed)
USFS, Everett, WA (J. Eberlein)
FHWA, Vancouver, WA (B. Coe)

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APPENDIX D LOG JAM PHOTOS

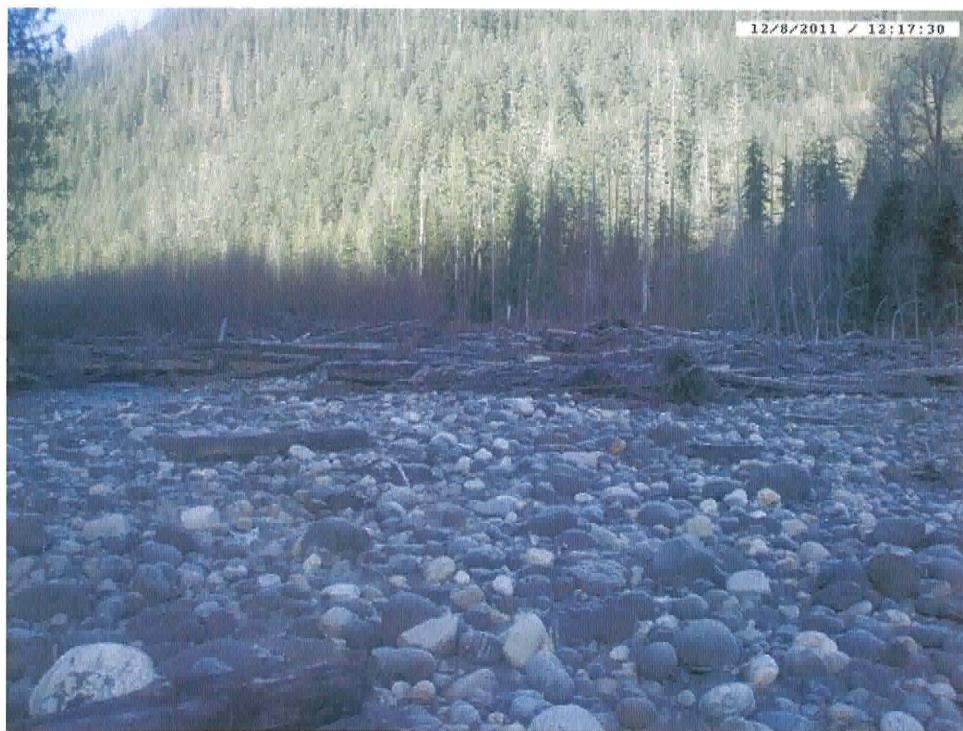
Field Map 12/08/2011



Number 002 as seen on field map above



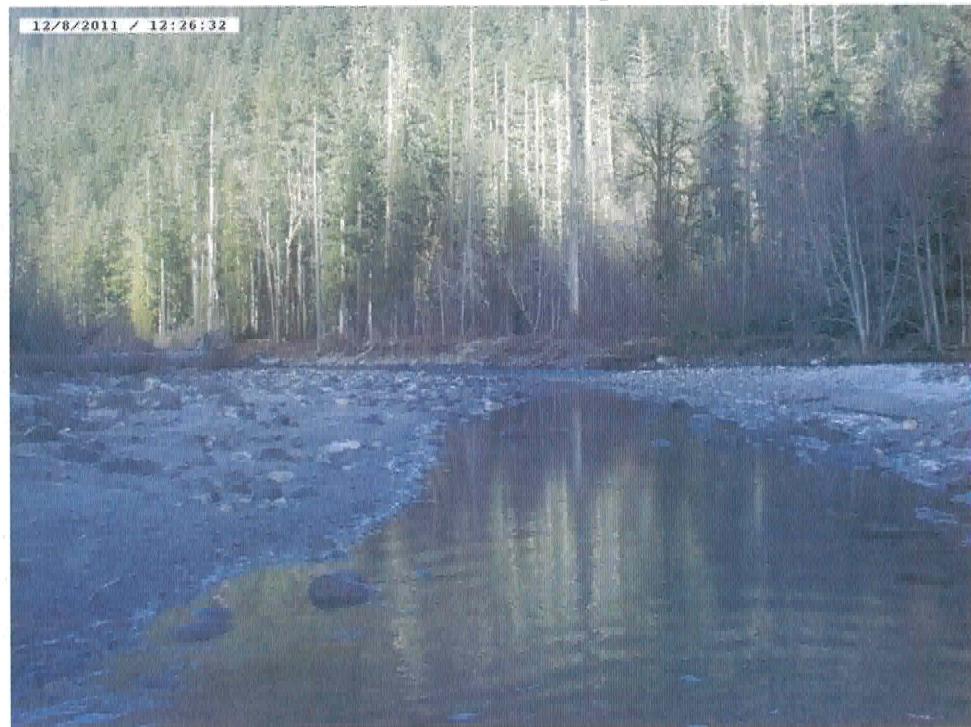
Number 003 as seen on field map above



Number 004 as seen on field map above



Number 005 as seen on field map above



Number 005 as seen on field map above



