 



April 11, 2020

Erin Uloth, District Ranger

Mount Baker Ranger District

810 State Route 20

Sedro-Woolley, WA 98284

Mount Baker-Snoqualmie National Forest

Subject:  Deadhorse Road Relocation Project Environmental Assessment

Dear Ranger Uloth:

The Mt Baker Group of the Sierra Club has reviewed the Environmental Assessment (EA) for the subject Deadhorse Road R3700 Relocation and offers the following comments:

The Sierra Club expects the Forest Service to maintain the highest level of forest practices in our national forest lands, especially to maintain or enhance habitats for wildlife and protect water quality, while allowing recreational use where consistent with those objectives.  Activities such as building roads in roadless areas, cutting in late successional forests, and degrading streams are not consistent with those objectives and must be avoided to the maximum extent.

The proposed action would result in a significant impact to old-growth forests and the wildlife species that depend on them, including threatened and endangered species.  Any plan to reroute the road must minimize that impact (by direction), and mitigate for any unavoidable impacts. We believe these impacts could be significantly reduced or eliminated with the development of a new more benign alternative or alternatives. We recognize that FR 37000 leads to one of the more spectacular hikes in the North Cascades, Skyline Divide, as well as Boyd Creek Interpretive Trail and campsites (With the current preferred alternative plan the Interpretative Trail will be closed and camping could also be relocated.) We believe that the Forest Service could possibly put a higher value on restoring roads such as FR 31000 .

See specific comments on the EA below:

* **Relevant Standards and Guidelines**. p 3.  The proposed action for R37000 is inconsistent with the management goals for W&SR that are noted in the EA to “Maintain recommended rivers and streams to protect their highest classification level until congress takes action…….” The preferred alternative is the most destructive of important outstandingly remarkable values that should include critical wildlife habitat for endangered species, late successional forests, and a generally undeveloped character of the river corridor.
* **Project Need statement**:  p 3-4.  The documented need appears to be driven by attempting to maintain access to recreation sites, avoidance of road reconstruction costs, and disruption to fish habitat caused by armoring.  We find this statement to be overly narrow and does not address the more comprehensive ‘costs’ of the project, particularly as it relates the impacts to late successional habitat. Furthermore, there is no quantitative statement of risk for washouts to the existing road, so urgency cannot be quantified.
* **Proposed Action**.  p 7.  To relocate the road requires heavy equipment, ‘significant tree removal’ and blasting.  We find that the *significant* large tree removal and its effects on late succession habitat are only addressed in the most cursory manner.  Such forest impacts require fuller analyses and examination as required by the S&G’s for LSRs.
* **Alternatives**.  p 4.  All studied road relocations are proposed within older forest stands (>160 years old) that are located within an LSR as well as within a W&S River corridor.  Given the sensitivity of the vegetative landscape, it is most disappointing that all alternatives propose constructing roads of maximum width through late successional forest stands.
  + The EA does not fully comply with NEPA guidance in that a range of alternatives was not studied and should be produced to completely address all significant environmental issues produced by the project.  However, the EA considers only the construction of new roads that are of maximum width right-of-ways that pass through ancient forests in an LSR!
  + This EA must evaluate the implementation of lower road standards.  This EA evaluation should have included alternatives with road right-of-way widths (road surface plus clearways), of 20 or 25 feet.  Also, the use of selectively placed turnouts with a narrower road could be utilized in place of 40-foot right-of-ways.  With such short roads lengths (0.41 to 0.68 miles), signage could well be the least expensive, least damaging alternative associated with a short, narrower road segment.
* **Alternative 3**.  p 5-6.  The EA states that the preferred alternative will require 0.68 miles of new road construction (3585 feet in length) and require the destruction of 3.45 acres of late successional forests (3.45 X 42,560 = 146,832 square feet) in an LSR within a recommended W&S river corridor.  Combining these data produces a total road right-of-way of 41.0 feet (road surface plus clearway).  We find such a road standard to be most excessive and unnecessary, particularly when located in an LSR that also traverses older forests (see page C-16 of S&G’s addressing road management in LSRs below).
* **Environmental Effects**.  p 6.  The EA is being blindly selective when it chooses which pieces of management direction with which to comply in the Standards and Guidelines (NWFP, 1994).  The EA discussion on Relevant Standards and Guidelines (p 2) is incomplete since it does not provide a quote for the LSR road management direction as noted on page C-16.    The S&Gs express a strong direction that “new roads” in LSR’s be avoided. Resource mitigation measures and effects have not been “minimized to the greatest extent practicable…” since a maximum sized road right-of-way is proposed in all alternatives as well as the preferred alternative.
  + Page C-16 of the S&Gs on LSRs:  “Road construction and Maintenance: Road Construction in Late Successional Reserves for silvicultural, salvage, and other activities is not recommended unless potential benefits exceed the cost of habitat impairment.”  The EA fails to evaluate potential benefits as cast against costs. And the EA glosses over the costs in a most superficial way.
  + Page C-16 of the S&G’s quoted above further states: “If new roads are necessary to implement a practice that is otherwise in accordance with these guidelines, they will be kept to a minimum, be routed through non-late-successional habitat where possible, and be *designed to minimize adverse impacts* (italics added).”  Our evaluation of this proposed project finds that the EA proposes to build roads of a maximum standard of the greatest length through an old growth forest such that none of this direction has been followed. Please address NW FP direction.
* **Botany**. p 6.  The EAs environmental effects analyses are again both superficial and cursory.  It is a major oversight not to fully address the loss of older forest stands, particularly within an LSR and do complete surveys as part of this EA.
* **Wildlife**. **Direct and Indirect Effects of Action Differing Alternatives**. p 12-14.  This section appears to be based upon the Aquatic Restoration Biological Opinion II (ARBO) while providing only the barest discussion of this document’s contents.  Since the document is not available to the public (and is unavailable on the MBS NF website), we find the withholding of this information disturbing.
  + Page 12. **Table 4:**  **Wildlife Alternatives Table**.  A review of the large numbers of large trees (>30 inches DBH) to be destroyed is alarming.  The EA breezes over these facts by simply disclosing the numbers lost and simply stating that this loss is less than 1% of the mature forest cover in Hedrick Creek.  While the S&Gs require that in such circumstances new roads in such places are to be kept to a minimum and then designed so as to limit adverse effects, this EA does neither.  Instead it proposes to maximize the adverse effects on the critical habitat of threatened and endangered species. An evaluation of the effects of lower standard, shorter road must be added to the EA evaluation.
* **Direct and Indirect Effects of Road Relocation**, ***Habitat***. p 12& 13.  We do not think this analysis is sufficiently detailed to sufficiently address the issues of the loss of late successional forest habitat caused by this project.
  + While the importance of late successional forests is well known as a result of many studies (see the link below to a relevant article in *Science* magazine dated April 2020[[1]](#footnote-0)) to help counteract the detrimental effects of climate change. We find it is inconsistent with our long-term interest to make a conscious decision to destroy such forests even if this capricious action may replicate forest destruction of natural events.
  + The loss of late successional forests from this road relocation is compared to the extent of mature/old growth forests in Hedrick Creek. We find this a most perplexing example since Hedrick Creek is located no less than 4 miles west of the proposed project, outside the national forest boundary and on private land. We find it highly unlikely that any mature and old growth forests still remain in this drainage, let alone as many as 4+ sections of older forests noted in the EA. We conclude that the reference to Hedrick Creek is a ‘typographic error.’
  + P 13. There is potential for blasting to occur during the Marbled Murrelets ( MM ) breeding season. Since there has been no great urgency disclosed to proceed with this project, we recommend that blasting and construction be scheduled outside the nesting and breeding season of the MM.
  + P. 13. The EA states that the area for the proposed actions has not been surveyed for “suitable habitation of a variety of wildlife.”  We find this disclosure most extraordinary!  Before a new road is built through the middle of a late successional forest in an LSR in a recommended W&S River corridor, the appropriate area must be surveyed before a preferred alternative can be logically selected.
* **Action Summary for Spotted Owls and Marbled Murrelets.** p 14.  The analysis basis documented appears limited, cursory, and somewhat unprofessional.
  + P. 14-15.  Table 5: Effects matrix.  This matrix represents what appears to show the results of an evaluation of environmental effects that contained little substance.  The table of effects represents the obvious and is not informative.
  + These road projects would bisect the old growth forest and threaten nesting sites for Marbled Murrelets (MM) and Spotted Owls (SO) which are endangered species under the 1973 Endangered Species Act. In 1992 the MM was listed and 1990 the SO was listed.  The loss of old growth forests is a primary threat to the survival of these two species. These listings were the major reason for the direction contained in the S&Gs that deal with roads within late successional habitat that are within LSR’s.
  + In consideration of the time-line for construction is in the breeding season and we strongly recommend that a mitigation for this would be to delay the construction outside of the breeding and incubation season. The MM season spans approximately from March 24-August 25, while SO eggs are laid in the early spring and hatch a month later. The owlets are able to perch away from the nest but remain nearby for their parents to feed them

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In summary, the EA fails to consider a reasonable range of alternatives and mitigation is not addressed.  Mitigation must be part of this project.  Such mitigation could be acquisition of currently unprotected late successional or old-growth forests in the watershed or protection of additional mature forests that would otherwise be available for cutting. This offset should be in a ratio that acknowledges the lower habitat quality of the mature forest for another 3-5 decades. Additional alternatives should be developed with lower road standards.

Further, the proposed action for R3700 is inconsistent with the management goals for the national forest and this forest plan land use allocation. The W&SR recommendation has not been adequately addressed. The need for this project is not fully addressed as well as its urgency.  The proposed action needs further refinement both as to costs, and the destructive nature of the new road. Full costs to fish, spotted owls, marbled murrelets, other wildlife, and old growth forests must be assessed. Discussion of alternative road designs with reduced right-of-way widths was absent and needs to be examined. No decision should be taken until that analysis and a more complete survey of the project area for wildlife and plants has been completed, and the minimum impact alternative selected.  While improving the condition of the floodplain and avoiding loss of this road is important, it is not imminent.  Thus, the Forest Service has time to do further design and environmental assessment of the proposal.

In light of the COVID-19 pandemic and its disruptive effects, we request that the comment period for this project be extended for 30 days.

Thank you for this opportunity to comment on the Deadhorse Road Relocation project.  Please respond to these comments, provide us with an analysis of a minimum width road alternative, and keep us informed of any actions related to this project.

Sincerely,

Judith Akins

Co-Chairperson MBG Sierra Club

2174 E Birch St.

Bellingham, WA 98229

Email: [jakinsmbgsierracl@gmail.com](mailto:jakinsmbgsierracl@gmail.com)

phone: 360-982-8599

cc: National Forest Supervisor -

Jamie Kingsbury

Email: kingsbury.jamie@usda.gov

Mt Baker/Snoqualmie National Forest

2930 Westmore Ave. Suite 3A

Everett, WA 98201

1. An article from *Science* magazine (titled “Why Old growth Trees Are Crucial to Fighting Change”): <https://www.wired.com/story/trees-plants-nature-best-carbon-capture-technology-ever/?fbclid=IwAR2iTjrSeEzJ4UOapipgjpfpIlK_rSIccpizbiYkfpy9_UhnzQqdalx9Xvg> [↑](#footnote-ref-0)