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Comments: Comment on Greenwater Access Travel Management Plan

Thank you for the opportunity to submit public comments on the Mount Baker-Snoqualmie National Forest's Greenwater Access Travel Management Plan.

In solidarity with Conservation Northwest, a regional organization representing over 4,000 dues-paying members and over ten thousand activists, supporters and online followers, I support the effort by the Forest Service to identify and move towards a sustainable roads system in the Greenwater area.

However, I feel that neither the Greenwater Access Travel Management Plan's proposed Alternative 2 or the modified Alternative 3 meet the purpose of the planning effort to "restore and protect the watershed's ecology from impacts of the road system" while providing necessary access for recreational, cultural, and management purposes. Instead the action alternatives make incremental first steps towards reducing the impact of roads on the watershed while leaving important natural resource risks unaddressed, an unnecessarily large Level 1 closed system in place that will require restoration investment and enforcement to maintain, and a total road network that exceeds your projected budget levels.

As a Tier 1 watershed designated for its importance, Alternative 3 takes a dramatic step backwards from the original proposed action (Alternative 2) in reducing the impact of the road system on aquatic systems. Alternative 2 reduces 73 percent of the high risk roads to fish species while Alternative 3 proposes to only address 32 percent. Additionally fewer habitats would be opened to access by fish in Alternative 3.

The EA states that "Known departures from natural sediment and temperature conditions in the Lower Greenwater River subwatershed would benefit" from any restorative action in this 303d listed watershed but that "implementation of Alternative 2 would provide greater benefits to all soil and water effects indicators when compared to action Alternative 3."
Alternative 2 would have recovered flow patterns for water on the landscape in the Lower Greenwater River Subwatershed to allow a reduction in designation for the area from the "not functioning" 4.4 mi/mi2 to a "functioning at risk" 1.45 mi/mi2. Alternative 3 does not propose enough restoration to shift this designation and the watershed would remain in a "not functioning" status. In a Tier 1 watershed, the goal should be to move towards a functioning watershed.

The sustainability of the road system requires that the roads themselves are located in sustainable places to provide access over time. 51 miles of roads lie in areas rated "unsustainable" currently with additional risks presented to this system from climate change. Alternative 2 only addresses 12 of 51 miles of "unstable" roads that should be treated, while Alternative 3 addresses only 9.5.

We support the closures of some open roads as ML2-A to provide for greater elk security in habitats created to promote elk forage habitat, and again see that the EA states "Alternative 3's long-term beneficial effects are less than 2 because fewer roads will be closed to motorized access" which has impacts to a variety of wildlife.

Thank you again for this comment opportunity and for your work to steward the important natural, cultural, recreational and ecological resources on the Mount Baker-Snoqualmie National Forest.

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