Data Submitted (UTC 11): 10/20/2018 5:34:16 PM First name: Richard Last name: Shugerman Organization: Title: Comments: Keep Roadless Areas Roadles!

Dear Erin Uloth,

I am writing to express concern for the redevelopment of the Excelsior Mine and the new road construction in the Mt. Baker North Inventoried Roadless Area. Our roadless areas are comprised of unlogged ancient forests which are underrepresented on national forest lands due to unsustainable logging practices decades ago. Roads also have measurable and important impacts on the watershed and surrounding environment and the area proposed for new road construction has been and should continue to be managed for unroaded values.

The 2 million acres of roadless forests here in Washington State are a critical part of the quality of life we have come to expect. Roadless forests provide much of our clean water and safe drinking water, besides protecting fish and wildlife. New road building in an Inventoried Roadless Area is unacceptable and threatens these values. In fact, unauthorized road development work has already taken place within the Mt. Baker North Inventoried Roadless Area prior to completion of the environmental analysis and public involvement process. This activity clearly violates both the Roadless Rule and the National Environmental Policy Act. The Forest Service should take immediate corrective action and suspend further review of the proposed Excelsior Mine operating plan pending an investigation.

In addition, there is another alternative that includes repairing the washout on an existing Forest Service Road that provided the original access to the Excelsior mine site without impacting the inventoried roadless area. Repairing this road would restore access without violating the Roadless Rule and potentially at less or comparable expense and impact than constructing a new road through intact old-growth forest to arrive at the same location. The EA should be supplemented to include the analysis of this alternative

I urge you to consider an alternative that does not violate the Roadless Rule and protects clean water, fish and wildlife habitat and world class opportunities for recreationists and the ability for northwest Tribes to exercise their cultural and treaty rights.

Sincerely, Richard Shugerman 6219 21st Ave NE Seattle, WA 98115