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Darrington Ranger District  
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RE: EA – Suiattle Access and Travel Management

When the current forest plan was adopted and the timber industry collapsed, the local rural communities were promised economic development via recreation/tourism and watershed restoration. Nearly 20 yrs later, very few local contractors have been able to participate in watershed restoration because these jobs were set aside for HUB zone contractors. Local contractors in Snohomish Co were forbidden to bid because Snohomish Co is not a HUB zone due to being close to urban areas.

Since 1986 the forests and mountains surrounding Darrington has lost 90% of our day hikes to high mountain meadows and lakes due to road closures and flood damage. Several local businesses have failed. The Suiattle EA is narrow focused and should take into account what recreation opportunities such as day hikes under 6 miles round trip are left overall in the Darrington Ranger District since 1980. Also, a trail with a steep elevation gain is not as enjoyable to hike even if the mileage is short. Just because there is not a trail at the end of a road, does not mean that the road is not used for gathering berries, medicinal plants, hiking cross country, enjoying solitude. These are areas of information that the ID team members may not have access to.

Already 70% of the Suiattle area is in wilderness. In reality with roads closed due to flood damage, wind damage etc. It is more realistic to have 80% of the area closed to motorized access. So why do we have to sacrifice the last 20% for the critters? The multiple use act in the 1960's has a human/motorized recreation component. It appears that the majority of comments in the scoping responses concerning motorized access were not addressed in the EA, but skipped over as non important. The proposal is for 23 miles to be put in storage and 51 miles to be obliterated.

It was only this past yr. that I found out that when a road was put in storage, the public did not have to be notified. So, a lot of roads forest wide are no longer drive-able and were put in storage with out consideration of the local community's social and economic impact.

How much money has been spent in the last 20 yrs decommissioning and putting roads in storage vs. maintaining and upgrading roads on the Darrington Dist.? Seems there is plenty of money to eliminate motorized access.

As far as safety concerns (pg 5), how many accidents have occurred over the last 25 yrs? If you had to go to court and make a case, what documentation would you have? Not assumptions, or could have, but actual safety concerns resulting in injury?

As far as sedimentation to the streams, how many actual experiments where the dye has been dumped on the road of concern to see how far it traveled in a high rain event? Or is the assumption computer modeling, not on the ground truthing? Have the scientists actually documented in this particular watershed, salmon eggs or fry actually dying due to siltation?

If we are concerned about salmon, then we also need to put into the equation over fishing in the oceans. National Geographic and the Smithsonian have addressed these concerns this past year. Salmon used to double their weight when arriving in the Puget Sound before returning to the rivers to spawn. After the 1970's when our local waters became open to foreign fisheries to harvest herring and candle fish, the weight of the salmon has decreased almost 75% since the 1960's. Don't you think the overall health of the fish may be also impacting numbers? Washington State does not guarantee escapement to our rivers before opening up the fishing. Alaska does and still appears to have better fishing than here in the Pacific NW. It is not just the habitat, you must look at the big picture and all the impacts on the fishery. (The Sustainable Fisheries Act of 1996, on pg 11 does not address ocean conditions)

The Spotted Owl is first addressed on pg 7. There have been no spotted owl surveys since 1993. How do we know if the forest plan is working if we do not know what current conditions are and if what was implemented in the plan is working?

There is very little written concerning allocations on pg 8 that address the impact on the ecosystem with the lack of fire and clear cuts for young forest plants for forage for wildlife and berries and medicinal plants for gathering. Different plant populations grow at different elevations and slope aspect, and soil composition from valley floor to mountain top. So each drainage, or watershed has different components that support different plants and wildlife. One size does not fit all and unless you are ground truthing, GIS is only partly helpful in looking at the overall aspect. I have been doing plant lists on the various drainages for 25 yrs, and I can attest that there is a great variety and difference from one road to the next.

The only roads that are slated for passenger cars are the 26 road along the river and the Green Mtn. road. With the current gas prices and depressed economy, very few people, especially the tourist kind, do not have 4 wheel drive, high clearance vehicles to drive the other roads.

On pg. 15, social and economic effects are mentioned. This EA does not specifically address the economic and social impact the forest plan has had on the Darrington Community since the 1993 Forest Plan was adopted.

Pg. 19, All level 2 roads should not be dug up, but allowed to close naturally. Level 3,4, 5 should be maintained for motorized access.

The cost of decommissioning a road is \$30,000 plus per mile vs. under \$1000 a mile for maintenance. This cost of \$30,000 is conservative as this summer an engineer estimate to dig up the Circle Peak road was in the ball park between \$500,000 to \$750,000 total. Another example of \$\$ spent is the Falls Creek road which cost \$380,000 for an upgrade to access logging and the road is slated to be dug up. Instead of leaving the road alone to access Falls Creek waterfalls and a way trail to North Lake.

The forest specialists have concluded that it is okay to maintain the 27 Straight Creek rd even though there are slides. Over the years there have been more slides on the 27 road then Circle Peak road 2703. The kicker is that the rock and soil on both roads are basically the same. So why is it okay to leave the 27 road but we have to dig up the 2703 road. (pg 21) The trails being built to Circle Peak is 5.8 mi and 5.6 mi. to Crystal Lake. This is one way and basically makes this off limits for a day hike unless you are in excellent condition. Who wants to hike all day and spend less than an hr at Circle Peak or Crystal Lake? Or the alternative is backpack, and many of us do not have the strength or stamina to back pack any more.

One thing that is not addressed in this EA is access for the elders and the handicap. Part of the social impact.

Already the 25 road to Lime Creek has been closed from Circle Creek. Lime Creek had many recreation, fishing, cultural, and gathering opportunities. This was also access to a way trail to Box Mtn. Lakes and berry fields. In the early 1990's there was a slide near Lime creek, after 24 hrs the water running off the toe of the slide was crystal clear enough to drink. You see a lot of the rock in this drainage is granite, quartz, sand, etc. Not silt bearing soil.

Hydrology and Soils are discussed on pg. 35. The chocolate color of the Suiattle river occurs in the summer when the water flows on the roads is minimal to non existent. In the winter when the rain and rain on snow is significant on the roads the river is a nice green color. Go figure, the siltation is from the Glacier and not the roads. As far as the roads and culverts etc., the vegetation along the roads filters most of the sediment from run off. Further more, sedimentation is a natural process bringing fertile soils and minerals to the valley floor making fields fertile for growing when these lowlands flood. This process has been naturally occurring since the last ice age.

If you cannot maintain a road due to lack of funding, walk away and let the road close naturally. The FS has spent millions over the past 20 yrs digging up overgrown roads with trees 6" to 12" diameter and 20 to 40 ft tall. (pg. 36)

Circle Peak road sediment concern is not founded on good scientific measurement. This road has been stable even thru the 2003 and other flood events since. (pg 41)

If roads are constructed for logging they should be left open and accessible for at least 5 yrs for gathering of plants and berries that occur after harvest. (pg. 42)

On pg. 43, soil compaction is discussed as a detriment to growing trees in paragraph 2. So if this is truth, Why are there so many big trees growing on the old rail road grades all over the forest?

Stream temps are discussed on pg 46. Have there been actual stream temperatures taken over the summer months on a regular basis to ground truth the assumption? (Especially, temps in the fish bearing streams?) On pg. 47 states stream temp. have likely increased from natural conditions. This is an assumption, not scientific fact based on data obtained in the field.

The Circle Peak trail access is discussed on pg. 48. Circle Peak trail is one of the last fairly easy access trails to mtn. meadows, medicinal plants, huckleberries, Indigo Lake, etc, on the entire forest. There are areas along this road to gather pine and chantrell mushrooms. This trail is accessible to families and elders. If you take this trail away, what is left on the entire Darrington District for comparison?

On page 51 Chinook spawning habitat is a concern. It appears that the fisheries folks have only gone back less than 10 yrs for their data. What about historical records over the past 100 yrs.? What about ocean conditions and over fishing as part of the equation? Tribal ancestors were able to identify salmon according to what creek they spawned in. This knowledge comes with living intimately with the land. Fisheries biologist today do not spend the majority of their time in the field becoming knowledgeable with each stream let alone each family of fish. The point being, computer modeling will never take the place of in depth studies out on the ground.

As far as grizzly bears, Mtn. goats, and other species of concern (pg. 54), meadows and open areas with young forbes, grasses, sedges, are fewer today than 20 yrs ago. From valley floor to mtn. tops the lack of fire and clear cut openings is eliminating forage and prey base for many of these species. Did this EA take into consideration Jan Henderson, USFS forest ecologist, reports on the fire history and plant types across the landscape? Since the Forest Plan adoption in 1993 there have been no further in depth spotted owl studies. It has been nearly 20 yrs and the FS has not gone back to look at assumptions made by computer modeling to see if these assumptions were correct or if the plan is actually working. On pg. 55 different stand classes are mentioned. What is missing is the young forest under 5 yrs. This stand also provides a prey base for all sorts of critters including the owl, which have been known to move their nest site to the edge of a clear cut. Also the barred owl issue was not address adequately in the EA.

On pg. 58 the Murrelet is addressed. We worry about nesting sites while it is okay for fisherman between the WA coast and Alaska are allowed so many murrelets incidental take in their fishing nets.

Deer populations are currently at low levels. (pg.61) According to Art Ryals diary in the 1960's he had deer counts up to 600 on Pugh and Spring Mtn. Art stated that the deer population exploded after the North Fork of the Sauk had many clear cuts and fire and provided ample forage. So it is a given that fire or clear cut opening play and important part in the wildlife equation. It is also mentioned that 100 vehicles an hr is the threshold to become a barrier for

grizzly bears. Does the FS actually know how many cars a day travel the Suiattle and for how many days out of the year?

Discussion on pg. 66/67 comments: Acres on a GIS map are inadequate do not show the whole picture. What is needed is ground truthing as far as terrain, north or south slope, soil types, elevation, plant diversity, all should be part of the science for the final answer. When you look at the forest plan as a whole over 90% of the land base is closed with wilderness, roadless areas, roads closed by flood and by the FS. When the entire plan is evaluated less than 3% of the land base is open to motorized recreation and this was in 1993. Many more roads and areas have been closed since then.

A seasonal gate is mentioned on Tenas Creek bridge (pg. 73.) Why is this necessary? Snow will be the limiting factor. Is there scientific documentation of goats in this area? Tenas Creek was not mentioned in Art Ryaly wildlife diary.

Closing of roads to eliminate hunting should not have to be. These roads should be kept open for recreation and hiking. If you do not want the hunters there close the area by signing and regulation of no hunting. (pg. 74/75) Limit hunting by special draw and work cooperatively with tribal councils to regulate tribal hunting in sensitive areas to achieve the goal of healthy wildlife populations before any hunting, tribal or otherwise is allowed. James Joseph, a past tribal elder taught that in the old times before white men, scouts were sent out to check on the deer, elk, mtn. goat herds to see what herds could handle harvest and be sustainable.

On pf. 77 Neotropical Migratory birds are mentioned. I have observed a greater diversity of birds in young growth 1 to 5 yrs after a clear cut or burn. I have observed an abundance of humming birds in the spring above 3500 ft in the young evergreens under 15 yrs of age along the road to Tupso Lake up Grade Creek.

On page 80/81 forest stand treatments are mentioned. However roads such as the 2510 rd and other roads that access mtn. ridges have more value than growing trees. There are the huckleberry fields and medicinal plants that also need to be considered. 20 yrs ago you seen very few tribal vehicles in the huckleberry areas. Now you have several tribes coming by the car load to pick berries. We need more access so there is enough for everyone, not less.

As far a Circle Peak Rd is concerned, this is the only road in the entire area that has yellow cedar to peel. So if you close this road where else close by is there yellow cedar?

On pg. 89, trails are mentioned. FS states trails are more desirable with less elevation gain. Also shorter trails under 6 miles round trip are needed. Due to the fact that folks from urban areas have more than a 1.5 hr drive to get to trail head, a short trail to a high mtn. meadow or lake is much more desirable so they can spend more time enjoying the mtn. meadows and lakes and not spend time hiking a road. It is also stated that more users in a smaller space will create conflict. One of the things needed in today's stressful times is a place for solitude and renewal. This EA with the proposed road closures does not provide this. The mileage mentioned on pg.90

is one way mileage, not round trip. A 4 mile trail is doable for a day hike, an 8 mile trail is not especially if there is significant elevation gain. Last yr. I hiked into the first meadow on White Chuck Ridge. There were 5 small groups that we met that day. I stopped and asked why this ridge? The answer was it was a drive that got you up high in the mountains with views. The hike to the meadows was short, the view great, and the big thing was the time constraint. It was quick to get to and you were immediately in the high country when you left the car.

On pg. 97 Fire history was addressed. It appears that records from 1952 to present were noted. However, there are records available from Jan Henderson of the USFS. When looking at the soil in most of our mountain areas you will find a layer of burned material.

Table 19 on pg. 101 discusses the different roads. The 2510 road needs to be kept open to the end and ridge top for berry picking and medicinal plant gathering. Tenas Creek 2660 should be open at least to the Boulder Lake trailhead. Buck Creek should provide access to elders and the handicap. The 25 road should be open to Lime Creek but at the very least be able to access Lime Creek with ATV's. As should we be able to access all roads by ATV that have been closed, making day hikes into overnight hikes. Meaning, that you can throw your pack on the ATV and access these closed roads trail heads and still enjoy the trail as a day hike. I am not advocating noisy, racing ATV's but a means for elders and handicap to still be able to access these areas that have been closed to cars and trucks. Circle Peak definitely needs to stay open to the current trailhead at the end of the 2703 road. Circle Peak meadows and Indigo Lake are unique and an excellent day hike as well as access to huckleberries and other medicinal plants, chantrell and pine mushrooms, and of course yellow cedar.

On pg. 103 it states a road system needs to be safe. Define safe in legal terms. At some point you need to let the public take the risks. After all over the years there have been more mtn. climbers killed vs. people being killed driving a car on a mtn. road. I know of no snowmobile/car encounter causing injury on the Forest. After all maybe we should close all the climbing routes as they are dangerous and people get killed. Let the roads close naturally if not in use.

On pg. 104 it is mentioned the costs of placing 2703 Circle Peak Rd in storage is \$225,000. However, in a conversation with the FS engineer this past summer the estimate was close to \$750,000.

Pg. 105 mentions roadless areas. Isn't the crux of this whole EA is to eliminate roads to artificially extend roadless areas and the Glacier Peak Wilderness. After all, in 20 yrs from now most folks from the city will not know that an old road existed hence more legislation to extend the wilderness boundary yet again. We only have to look at the Big SKY in the Skykomish drainage to see that roads and bridges can now be included in wilderness. After all, was not this the goal when the FS deliberately burned Native American homes in the Suiattle Drainage because in the future these sites would be overgrown and no one would know a perfectly good houses were across the landscape.

On pg 106 Other Environmental Components are mentioned. This entire EA is contrary to local community social and economic impacts. Tier I and II Watershed and Old Growth Preserves are incompatible with recreation and tourism that bring in \$\$ to the local community. Also, due to the fact the local contractors were promised jobs in watershed restoration when the logging went away, but 90% of the work went to HUB zone contractors over the past 20 yrs. Snohomish Co. contractors living in Darrington who have lost their livelihood cannot bid on these jobs because Snohomish Co is not in a HUB zone because of Boeing and Microsoft and urban areas in the county.

On page 111 public notices are mentioned. I have been begging the local Dist. Ranger Peter Forbes to sponsor a round table discussion with all user groups and environmental being in the same room to try to find some common ground and understand all the issues. This request has not been followed thru. In fact the last public community meeting was in 2007 when we were promised better communication and dialogue. The email list and notification lasted about 1 yr. When Cindy White was moved to a new job, all email notification was stopped.

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