

Appendix B

Response to Comments

Fifty six comments were received during the review period of the Illabot Road Project EA. Many of the comments were received addressed similar topics. To make the best use of the comments in arriving at a decision, comments having similar themes have been condensed below. The number(s) in parentheses following the condensed comment reflect the number assigned to the comments as they were received.

The response to each comment is provided below it in italic type. In most cases, the comment is addressed in the EA and a page number is supplied to where the information can be located in the EA.

Comment Synthesis

Recreation

The Illabot Road provides relatively easy access to a number of quality lakes via informal paths and cross-country travel. There are few roads in the MSBNF system provide access to such wild places with relative ease. Without this road, the area would be essentially lost for recreation. Off-trail enthusiasts highly value this area because of the easy access to places with rugged terrain, high lakes, and light visitation. (1,5, 10, 12, 13, 17, 25, 26, 27, 46, 51,53, 56).

Response: *These aspects of the recreational opportunities in the Illabot Creek watershed are noted on pages 22 -31 of the EA. The EA (pages 46-48) describes how each alternative would eliminate or reduce the ease of access and recreational use. If the proposed action is implemented (EA pages 46-48) much of this use is expected to be displaced to other areas that have some similarities, but not identical characteristics (EA pages 48-50).*

The Slide Lake Trail provides easy access for older people and those who don't have the opportunity of devoting several days to access wilderness areas (2) or who are not physically able (young, old or disabled) to arrive at locations requiring more arduous hikes (2, 7, 13, 29, 51, 56).

Response: *This aspect of the Slide Lake trail is recognized on pages 23 and 24 of the EA. Implementation of the proposed action and Alternative R would eliminate these types of uses in the Illabot Creek watershed (EA page 46), but similar opportunities would remain at other locations (EA page 49).*

These lakes are of vital importance in reconnecting urban people, rural people, children and seniors with nature. (7)

Response: *This aspect of access to the lakes is recognized on pages 23-31 of the EA. There are many locations that would continue to have easy access where people of all sorts can reconnect with nature (EA 49 – 50) on the Mount Baker Ranger District. Additional opportunities exist in the area on the Darrington Ranger District, the North Cascades National Park, lands owned by the State of Washington, and at other locations.*

Closing this road will cause increased hunting pressure in remaining public hunting access which may lead to unnecessary tension between hunters and hikers, private property owners and increased need for enforcement activities. (7)

Response: *Because the people who would be displaced to other areas by implementing the proposed action come from many different locations (EA page 32) they are likely to use different areas if the proposed action is implemented and the increased use at these other locations is not expected to be noticeable.*

The analysis underestimates the recreation use originating from the road because many people using the Slide Lake Trail do not sign it at the trail register and many people use areas other than those accessed by the trail where there is no register. (7) Road counts would be more accurate (46)

Response: *Correction factors are used to account for those users of the Slide Lake Trail who do not use trailhead registers (EA page 24), but there is no available data to estimate the amount of recreation use that does not originate from the Slide Lake Trailhead, which has the only trail register (EA page 24). No road traffic counter data exists for Road 16. Road traffic counts would be an accurate way to track vehicles, but would not record the number of people or be able to determine if they were there to recreate. The EA uses the best available information to assess the impacts of the five alternatives on recreation use.*

Would horse and mule riders have access using the non maintained road 16? (8)

Response: *The proposed action would result in very difficult conditions for stock use (EA pages 47-48). Alternative R would allow bicycle use on the five miles of decommissioned road to the Slide Lake Trailhead, but it would not be constructed to accommodate stock.*

Could there be an alternative route to the area from the Marblemount (private forest land) area? (8)

Response: *The original project proposal included providing trail access from this area; however road access was not granted by the private land owner and as a result this option is not a viable option at this time (EA page 19).*

Alternative P will create additional salmon fishing recreation opportunities. (14)

Response: *Implementing the proposed action is expected to increase the habitat's ability to support salmon (EA page 55). This may or may not result in increased fishing opportunities.*

Road closures, including the Illabot Creek Road adversely impact remaining areas with road access by increasing usage to unacceptable levels. (20, 26, 29)

Response: *The loss of road access at several locations is expected to increase use at some other recreation destinations and some adverse impacts are expected at these sites (EA pages 49-50).*

In combination with other road closures, the proposed action will result in

- Degradation of the wilderness experience
- Localized destruction of the alpine and sub-alpine environment in which users access; and
- Increased car vandalism at trailhead parking lots, which will also need to be increased in size to handle the people now forced to use but a few locations (26)

Response: *Implementation of the proposed action is expected to reduce encounters with other people and enhance the wilderness experience for those who use wilderness for solitude (EA page 48). Because the people who would be displaced to other areas by implementing the proposed action come from many different locations (EA page 32) they are likely to use different areas if the proposed action is implemented and the increased use at these other locations is not expected to be noticeable with respect to the wilderness experience or how use at these sites impacts high elevation vegetation. Similarly, since displaced use is expected to occur at multiple locations, it is not expected that existing trailhead parking will need to be enlarged. Increased car vandalism at parking lots is not expected to occur as a result of having fewer trailheads.*

The standard for vegetation loss in wilderness areas is too strict and should not be a factor used to decide on decommissioning the road (54).

Response: *The standard is part of a system to establish limits on the change that can occur within wilderness areas before management access is needed to reverse the trend (EA page 28). The major decision factors as described in the Decision Notice on pages 3-6. Vegetation loss in wilderness area recreation sites was a consideration, but not a primary factor in arriving at that decision.*

Road System

I reject the notion that this road system cannot be maintained at a reasonable cost. If you spend the money needed to decommission the road system on the upgrades in option 2 [Alternative U], you will solve the environmental problems and reduce your maintenance costs dramatically. (2)

Response: *The \$880,074 needed to implement the proposed action is far less than the \$3,330,850 to implement Alternative U. It would cost four times more than decommissioning to reduce the environmental risk and there would still be a reasonable likelihood that a failure would occur at locations of unstable soil and/or stream crossings and as a result negative impacts to aquatic habitats and water quality. For example a failure at Mile Post 15.35 would be problematic (EA page 22) and vehicle access may not be possible to the Slide Lake trailhead if a failure occurs that cannot be repaired.*

Most of the road that would be decommissioned is flat and easy to maintain as evidenced by it remaining in place with little recent maintenance. (2, 26, 45)

Response: *Although this road did not suffer major damage in the floods of the early 2000's, it has had numerous failures that have prevented vehicle traffic at times. Approximately \$90,000 was needed in 2010 to reopen the road (EA page 21). The road is currently susceptible to major failures at several locations that would require much more costly repairs than was required in 2010 (EA pages 21-22).*

I suggest that you pursue a long-term, phased upgrade and maintenance plan to focus initially on the areas that have the greatest risk of failure so that the plan can be worked into your budget. (10, 18) What maintenance and road upgrade items would be required in the near future and what items could be deferred long term? (18, 44)

Response: *For the past 6 years, the average road maintenance budget for the 455 miles of drivable roads on the Mount Baker Ranger District has been just under \$152,000 (EA page 50). Many of the repairs needed exceed the annual road maintenance budget (EA pages 52-53). If such an approach were undertaken, there would be no maintenance on the remaining 400 plus miles of district roads, which would have far greater impacts to forest users than could be gained by keeping the Illabot road open.*

In addition, there are other roads that are currently blocked and competing for scarce maintenance funding. One of these is Road 31 in Canyon Creek that accesses a high use trail head, many dispersed hiking and camping spots, as well as being one of the most important snowmobile use areas. Since this road would likely receive funding before the Illabot road, a phased approach is not likely to ever complete the repairs and upgrades needed to avoid a major road failure and the adverse impacts to fish habitat and water quality.

I have examined the road with an experienced road engineer and the EA overstates its condition as poor. It needs culverts, ditch work and other maintenance, but it is not falling off the hillside as portrayed. (18)

Response: *A complete inventory of the road was conducted in 2010. The condition of Road 16 is described on pages 21-22 and the cost to repair the road is described on page 53. In addition to the loss of road width from sloughing off of the hillside, these pages describe several locations where the road is at a high risk of major failure unless repairs are made.*

A road does not have to be up to “standards” to be perfectly fine and useful for the average recreationist. What specific FS road standards on a level 3 road could be changed or delayed to lower cost? (18) To reduce maintenance costs, consider designating it a 4WD only. (20, 44)

Response: *Although many recreationists could negotiate a Maintenance Level (ML) 2 road (suitable for high clearance vehicles) if the ML is reduced from a 3 to a 2, the road would not receive the funding attention it needs. ML 3 roads are maintained before ML 2 are. Since there is currently not enough road funding to maintain all of the ML 3 roads, as an ML 2, the Illabot Road would receive no road maintenance based on current and expected funding levels and vehicle access would not be possible within a few years. In addition the road would continue to have a high risk of adverse impacts to fish habitat and water quality. A good example of this is the portion of the Illabot road from MP 20.5 to MP 25. It is a ML 2 and has numerous safety and road failures that need addressing because it has not received any maintenance in recent years. Because it has not received any maintenance it was closed for safety reasons.*

There is no urgency to decommission this road, which is currently in excellent shape. The condition and maintenance issues of this road are grossly overstated (19, 20, 21, 25, 26, 27, 42, 43)

Response: Although not obvious to casual users, the poor condition of Road 16 is described on pages 21-22 and the cost to repair the road is described on page 53. The road condition was determined by complete road inventory.

Opinion (no response needed)

Removing this road system contributes to the long standing thought that the only people the FS is interested in using the Wilderness are young white males and females in their 20's with no financial worries to deal with. (2)

Spending \$90,000 for major work on road 16 in 2010 and \$880,000 to close a road that serves a public need is a waste of government money. (5, 53)

I support the proposed action (6, 14, 52)

Please keep the road open (9, 11, 21-24,28, 31, 33, 36-41)

We need to maintain outdoor recreation to support the Darrington area (11).

I am not a biologist but find the assertions made in the Environmental Assessment that the fish will be harmed (both short and long term) by any alternative but Alternative P (Proposed Action) to lack credibility. (19)

Punish yourselves, punish loggers, do not punish hikers. (35)

Effects to Communities

Is the economic health of local communities taken into account when environmental assessments are made? (3)

Response: Yes. The EA estimates the impact to local economies on pages 32 and 65.

The many lakes accessible from Illabot Creek Road are a vital part of the future economy of the Upper Skagit Valley. Additionally, the revenue lost in the valley through hunters and hikers not visiting these trails is significant. (7)

Response: The EA estimates that up to \$6,000 less spending in local communities might result from implementing the proposed action and this potential reduced spending is not expected to affect local economies(EA page 65)

Assuming each visitor spends \$20 on gas is not a realistic analysis of potential economic impact from decommissioning the Illabot Road. It does not include the indirect benefits of purchasing recreation gear (18)

Response: The economic analysis assumes that recreation use will be displaced to other locations. It is unrealistic to assume that the only place that visitors who recreate is in this one location. As a result, there is no expectation that there would be a reduction in the sale of recreation gear. Because gear sales

occur largely in the I-5 corridor where the economies are diverse or using the internet, any possible reduction is unlikely to have an impact on upriver communities.

The EA evaluated the impact to smaller, upriver communities whose economies are more dependent on tourism and recreation. It assumed that some gas and food would be purchased in local communities(EA page 32), but that gear is largely purchased at other locations.

Economics

The \$8500 annual maintenance expense is insignificant compared to the cost of the decommissioning project that could pay for hundreds of years of road maintenance. (15, 20, 25, 26, 29, 30, 32, 35, 44, 46, 53)

Response: The cost to implement the proposed action could pay for years of road maintenance. However the \$8,500 that has been spent on average over the last several years is not what is needed to properly maintain the road. Between \$18,000 and \$21,000 is needed annually to properly maintain the road (EA page 51). This amount does not include all of the deferred maintenance on culverts and other road infrastructure that are needed to reduce the risk of road failure, which would cost more than \$3,000,000 for these alternatives (EA page 53). Considering the deferred maintenance that is needed to keep the road functioning and avoiding degrading a high-quality salmon stream, the proposed action is much less costly to implement.

It is also important to note that funding for implementing the proposed action is typically obtained as grants from sources outside the Forest Service. Similar grants are not available for routine road maintenance.

Explore the possibility of daily road use permits charging users a flat fee per day for use to supplement the existing road maintenance budget. (16).

Response: This option was explored (EA page 19-20) and was found to be not viable as a solution.

Alternative P is extremely costly - significantly costlier than the cost of keeping the road open as proposed in Alternative N. (17, 18)

Response: Alternative P costs more to implement than Alternative N. However, the funding for implementation of Alternative P is expected to largely come from non-Forest Service funds and would reduce the total road maintenance needs for the Forest Service. Alternative N would not reduce the total need for road maintenance and does not address the need to have a road system that can be maintained with the current and expected funding and does not address the potential adverse impact of the road to aquatic resources.

If the Mt Baker District produced some timber sales, there would be more money available for road maintenance. (18, 47, 54)

Response: Timber sales only pay for roads that are used for that sale. There is only a small amount of area where timber can be sold beyond Mile Post 9.5 because of its designation as a late successional

reserve and this particular reserve is lowest priority for treatment (EA page 20). As a result there would not be sufficient funds generated to pay for the upgrades needed to implement the needed improvements in road infrastructure. In addition, there would be no funds generated for annual maintenance by timber sales.

Aquatic Impacts

The EA essentially ignores the fact that fast-moving Illabot Creek is constantly eroding the banks and bed along its whole length. Illabot Creek has naturally occurring glacial silt input. Turbidity from glacial silt extends at least to the county bridge over Illabot Creek. Nothing in the proposed action will change this. That is the source of the vast majority of all siltation and scouring, and the contribution of the Illabot Creek Road, actual or potential, is negligible. The end result for water quality & fish habitat will be the same after proper road upgrades and maintenance as for destruction by decommissioning. The potential effects to salmon and aquatic habitats are overstated. (15, 18, 44, 54)

Response: *The current condition of Illabot Creek is recognition of the processes that shape and change the aquatic habitat in the creek. Most reaches of Illabot creek are high energy transport reaches and are capable of moving high sediment loads, however even high energy streams can be overwhelmed by catastrophic inputs of sediment from road failures in addition to already naturally high background levels. Road failures on steep unstable slopes are likely to occur, but can be prevented or reduced with proper road treatment. While upgrading roads with proper drainage and maintenance can reduce the risk of large scale failures, road use can produce up to 130 times as much as a decommissioned road (Reed and Dunne 1984). Given the high risk of a road failure due to steep, unstable soils, the poor condition of road infrastructure, and the inadequate road maintenance funding described in the EA, the source of most siltation is expected to change at some point from naturally occurring inputs to unnatural inputs from road failure(s). The EA evaluates risk to these unnatural sediment inputs and finds substantial differences between the alternatives.*

Local steelhead and Chinook salmon stocks are listed as threatened under the endangered species act and as depressed by the Washington Department of Fish and Wildlife. Elevated sediment levels in spawning and rearing areas are one factor that has contributed to population declines and can be controlled through proper road management.

Fish habitat restoration can occur over a period of time, incrementally, as funds allow, and as maintenance and major repair issues allow with Alternative N. (17).

Response: *True, however habitat in Illabot Creek would still be at high risk of negative impact from road failure as long as the road is in place on unstable soils. Current funding would not likely retain much of this road in its current condition resulting in a high risk of degrading fish habitat with Alternative N.*

There are also benefits to fish habitat from periodic inputs of coarse sediment and wood to streams from slumps, dam bursts and inner-gorge failures. Those benefits and the long term natural rate of input need to be documented in the EA. (18)

Response: *Slope failures such as slumps, landslides and inner gorge failures play an important role in delivering large wood and sediment to develop and promote diverse, high quality fish habitat. Large wood promotes habitat diversity and provides cover for fish, coarse sediment provides the substrate necessary for a healthy benthic community as well as providing necessary spawning gravels. Channel form is a result of stream and watershed interactions over time. These inputs are recognized in the Northwest Forest Plan as a primary purpose of Riparian Reserves and shape the way that Riparian Reserves are delineated. One objective of management of the watershed is to restore the natural rate of coarse sediment and wood delivered to the stream channel. Rates of natural input vary widely and are most often dependant on extreme weather events, occurring at multidecadal to century long scales. Road failures would increase inputs well above the naturally occurring rate.*

Past incidents, *directly related to road conditions*, of roadbed material reaching and impacting stream and fish conditions need to be documented by road mile and identified as part of the proposed road decommission segments or retained segments. Lumped as they currently are, they make accurate analysis impossible. (18)

Response: *The analysis does not rely on past incidents to evaluate the current and expected future risk of sediment delivery resulting from a road failure. The current condition includes a substantially degraded road infrastructure that is more susceptible to large failures than have occurred in the past. Many other factors also increase future risk of road failures and the potential for sediment to enter streams and affect fish habitat, including: the location of the road on the hillside and its relation to other road segments on the hillside, topography, unstable soils (and whether they extend down the hillside to or in proximity to the stream), and the occurrence of a road failure in or near surface flows that can readily transport sediment to the receiving waters (EA pages 56-65). It is impossible to predict specific locations of future road/slope failures, but the locations where conditions likely to produce road failures is identified in the analysis.*

Wouldn't decreasing the fishing quota on salmon result in a better improvement in salmon populations? (26).

Response: *While fishing quotas are outside the scope of this document, harvest management is an important part of any restoration program. We need viable populations of adults returning to high quality freshwater habitats for successful recovery of our anadromous fishes.*

Any road failure generated sediment would be mitigated and marginalized by the sheer distance required to travel between the road and the creek. (26)

Response: *Landslides are more likely to be associated with streams and other conveyances which are much more efficient pathways for sediment to be transported to Illabot Creek (EA page 35). In addition, unstable soils that extend all the way from the road to the creek are more likely to "unravel" as a result of upslope failures. The distance between a road failure and a creek is just one factor that determines the likelihood that landslide materials will travel to the stream. Other factors include the slope of the hillside, the type of landslide (e.g. debris flow, rotational or translational landslide) and the amount of woody material present in the slide. The steep slopes, dense drainage network including major streams,*

road system layout, and spatial distribution of unstable soils in the Illabot Watershed are all factors that increase the likelihood of sediment reaching Illabot Creek. (For more information, an excellent recent publication on landslides is: Highland, L.M., and Bobrowsky, Peter, 2008, The landslide handbook—A guide to understanding landslides: Reston, Virginia, U.S. Geological Survey Circular 1325, 129 p.)

The science supporting Alternative P, decommissioning this road, is weak. Past studies showed little impact of sediment, and the EA states "but these are old studies," as if to diminish their findings (Page 35 of the EA, citing Beamer) - yet the EA itself cites old studies to support the closure. Much of the science discussion is about the watershed and region in general, and even introduces a soils category that is not suitable for forest roads (S-8 soils), yet does not discuss whether or not that particular soil is within the project area (Pg 34). (45)

Response: *Pages 35 and 36 of the EA do not dismiss the findings of previous studies, but note that the studies did not evaluate the risk of sediment delivery from a road system that has a high risk of a major failure as a result of the current road condition. The EA focuses on the risk of future failures and less on the past impacts of roads. Previous studies did not evaluate the risk of road failure or include the information on the reduction in Forest Service maintenance funding or the continued degradation of culverts and other road infrastructure. The remainder of this section of the EA (through page 39) identifies specific areas where there is a high risk of sediment delivery to Illabot Creek. Pages 56 – 64 of the EA provide the basis for the risk of sediment delivery from road failure with each alternative.*

Pages 33 – 34 identify several unstable soil types including S-8 soils. On page 39 the EA describes that unstable soils, which includes all unstable soil types, "... generally underlie or are in close proximity to the first half of the FSR 16 road, from MP 8 to MP 16.". Page 57 indicates that in total 6.4 miles of the Illabot Road are located on unstable soils and table 4 on page 60 shows the length of road that would remain on unstable soils, including S-8 soils, with each alternative.

WDFW may no longer stock the lakes with trout (46).

Response: *WDFW uses a variety of methods to stock lakes with trout. Lakes near the project area may easily be stocked by air if WDFW chooses to continue stocking.*

Purpose and Need

In the Purpose and Need for Action, missing in the "need" portion is any mention of working for additional revenues. The "purpose" is the proposed action rather than why it is necessary. A more accurate purpose and need statement would also cite the potential to increase Forest Service receipts and that more money from receipts can be used for road and trail maintenance. What funding sources have been approached about road maintenance/upgrade funding? Options of increasing revenue or re-allocating budget are not considered as alternatives and should be. (18)

Response: *All options of securing adequate funding to maintain the road system were explored prior to developing the proposed action. Several of these are described in the EA (pages 18 -20). The proposed action was developed because there are no other viable options to secure road maintenance funding.*

The EA's statements about road maintenance funding as inadequate for the current road system leads to the question which roads are next? An EA should be prepared for this whole question rather than only the Illabot Road. This proposed action is connected rather than independent. (18)

Response: *It is likely that additional road closures will occur in the future given the existing and expected funding scenario. Currently there are no other specific road closures being considered that could be considered reasonably foreseeable to be included in this analysis.*

With a budget that has grown from 5.1 billion dollars in 2002 to 6.1 billion in 2011, explain why roads & trails cannot be maintained (18).

Response: *Explaining the trend in Forest Service funding at the national level for various activities conducted by the agency is beyond the scope of this analysis. Much of the increase is lost to inflation over that 10-year period. The EA accurately represents the recent historic and projected road maintenance budget for the Mount Baker Ranger District and that the budget is inadequate to maintain the existing road network. Inadequate funding for road maintenance has been ongoing and has contributed to the backlog of maintenance needs that put roads at high risk of failing.*

How are we to decide this road is of higher priority to decommission vs. other roads in the FS inventory which may be far more harmful to the fish? There are far many more USFS roads in worse shape causing worse stream damage - why were they not targeted for closure instead? (19, 20, 26, 50).

Response: *The Mount Baker-Snoqualmie National Forest evaluates its entire road system and weighs the risks and benefits of each road. Illabot Creek is one of the most productive fishery habitats and provides critical habitat for threatened fish listed under the Endangered Species Act and essential fish habitat for species listed under the Magnuson-Stevens Fishery Conservation Act. The Aquatic Conservation Strategy prioritizes protecting the most valuable fisheries resources.*

The proposal to decommission indicates milepost 10-18 as susceptible to failure, but yet includes an alternative to keep the first 4.1 miles of the road (milepost 9.5 -13.6) and decommission the road from milepost 13.6 thereon. This is highly contradictory and suggests fault in the logic and analysis of the overall decommissioning proposal. (26, 29)

Response: *Because the area has high value for both fish and recreation, Alternative R was developed to determine if a sufficient level of recreation could be provided for while at the same time reducing road maintenance costs and reducing risk to high value fish habitat to a lesser degree than achieved by the proposed action.*

People that will gladly volunteer their time and effort to perform basic maintenance to roads (26)

Response: *This option was considered as an alternative to the proposed action, but due to several factors discussed on page 18 of the EA, it was considered not feasible.*

Alternatives

We ask you to develop and implement a three---year monitoring plan to monitor:

- Regenerative growth of planted native and volunteer vegetation,
- Presence of noxious weeds and recommendations for their removal,
- Signs of rilling, gullyng, or erosional movement of soils that could potentially deliver sediment to streams;
- Signs of motorized vehicle use and need for increased enforcement.

We believe that post--project monitoring continues to be a necessary and important piece of this proposal. Data obtained from monitoring will provide valuable information as to whether the resource protection objectives are indeed being met. (49)

Response: *Since the effectiveness of mitigation measures and project activities are well understood, there is no expectation at this point that required monitoring will be a component of the decision. Monitoring of these items is expected to occur provided that budgets are sufficient.*

Laws and Policy Pertaining to Management of National Forests

The preferred alternative, P, is not congruent with the current “America’s Great Outdoors” Presidential initiative. (18)

Response: *Although where vehicle access occurs determine how the Forest Service implements its mission, it does not prevent recreation program emphasis where funding allows. The Forest Service mission also includes proper maintenance of roads and contributing to high water quality and fish production.*

Alternative P, as the preferred alternative, is single-minded pursuit of a vision that is directly at odds with founding and operative laws of the Forest Service including the Organic Administration Act of 1897 and The Multiple-Use, Sustained-Yield Act, 1960. How does alternative P reconcile with the intent of the Multiple-Use, Sustained-Yield Act, which states “It is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.” “Multiple use means the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people”. How does alternative P reconcile with the intent of the Multiple-Use, Sustained-Yield Act? (18)

Response: *The Decision Notice identifies why the selected alternative is believed to best provide for uses and resources of National Forest System lands.*

Miscellaneous

How much FS employee time has been expended in presenting proposals that seek funds for road decommissioning and what sources have been approach to obtain these funds? (18)

Response: *Employee time in seeking funding for road decommissioning, closures, and upgrades is not tracked in a way that would provide an exact amount of time. Sources that have been used to implement road closures and upgrades have included Legacy Roads, Secure Rural Schools and Community Self*

Determination Act of 2000, *Salmon Recovery Funding, Rocky Mountain Elk Foundation, and funds appropriated by Congress to name a few.*

This road is extremely important as a way to rescue lost hikers (54)

Response: *Providing access for search and rescue operations is one of the many benefits of drivable roads. However, there is no record of search and rescues for lost hikers in the Illabot Creek watershed.*

The decision to pursue closing this road was done without involving the public. (43)

Response: *Pages 7-8 of the EA describe the steps that were taken to involve the public in arriving at a decision on the Illabot Road.*

Comments/questions Outside the Scope of the Analysis

How much timber volume and revenue is the Mt. Baker Ranger District potentially capable of? How much is the Mt. Baker – Snoqualmie National Forest capable of? (18)

Impacts to Tribes

Loss of access, due to decommissioning, to the unique mix of plants could be a significant loss to tribal gathering. (18)

Response: *Six Tribes were contacted during the development of this EA (see EA page 10). Although several Tribes indicated that the proposed action would make gathering plants more difficult, none of these Tribes commented on the importance of this area for its unique plants or the inability to collect desired plants at other locations. The impacts to Tribes is discussed on page 75.*

Upper Skagit members actively exercise reserved treaty rights in the areas which this federal action is proposed. If the forest service proceeds with these closures it will be willfully diminishing these federally reserved rights and be in violation of the agencies trust responsibility to the Tribe. In addition to diminishing reserved treaty rights this action if allowed to proceed will affect the tribes ability to access culturally significant areas. (48)

Response: *Reserved treaty rights to access the area to hunt, fish, gather or pursue other cultural activities or practice would remain wholly intact with the proposed action, however the way in which these rights could be exercised would change. The proposed action would the Tribal members' ability to drive to and through this area. Access would be changed from driving to walking (EA page 75). The Forest Service fulfills its trust responsibility by consulting with federally recognized tribes, facilitating the exercise of treaty rights, carrying out the mandates of federal laws, and by protecting fish and wildlife habitat. The benefits of the proposed action include maintaining quality fish habitat (EA page 54-56) and an increase in privacy in traditional or religious activities (EA page 75)*