File Code: 1950
Date: April 24, 2017

Daniel M. Mathis
Division Administrator
Federal Highway Administration - Washington Division
711 S. Capitol Way, Suite 501
Olympia, WA 98501

Dear Mr. Mathis:

This letter documents my concurrence with the actions proposed by U.S. Department of Transportation – Federal Highway Administration (FHWA) on National Forest System (NFS) managed land for the Index-Galena Road relocation project (Index-Galena Road Milepost 6.4-Milepost 6.9 Project). Index-Galena Road is also designated as Forest Service Road 63 in the Mt. Baker Snoqualmie National Forest road system. Portions of the roadway, including the proposed project area, are located on NFS managed land, and must be authorized through a right-of-way easement.

Background

In November 2006, a major flood event caused catastrophic damage to Index-Galena Road. High flows from the North Fork Skykomish River eroded portions of Index-Galena Road at multiple locations, resulting in partial loss in some areas and complete loss of the roadway between Milepost (MP) 6.4 and MP 6.9. This damage caused the road to be impassable for vehicular traffic and eliminated through-route access from the town of Index to areas further upstream. A side channel of the river now occupies extensive sections of the existing Index-Galena Road roadway alignment from MP 6.4-6.9. Damage from the 2006 flood event resulted in Index-Galena Road being closed from MP 6.4, just east and upstream of Snohomish County’s Trout Creek Bridge #494 at MP 6.05, to MP 6.9.

The purpose of the Index-Galena Road Milepost 6.4-6.9 project is to restore essential travel. Essential travel includes re-establishing access for property owners with land holdings in the North Fork Skykomish River valley upstream from the town of Index, re-establishing vehicular access for emergency service providers to these properties, re-establishing public recreational access to the North Fork Skykomish River valley, and re-establishing administrative access for the U.S. Forest Service (USFS) to manage NFS lands located in the Mt. Baker-Snoqualmie National Forest.

The FHWA is the lead federal agency for compliance with the National Environmental Policy Act (NEPA) on this project. FHWA, Washington State Department of Transportation (WSDOT), and Snohomish County Public Works, published an Environmental Assessment (EA) for the project on September 19, 2016. On April 14, 2017, FHWA signed a Finding of No Significant Impact (FONSI) for the project based on the previously published EA.
Project Location

The project is located in Township 28 North, Range 10 East, Sections 35 and 36, Willamette Meridian; southeastern Snohomish County, Washington. The project is in the North Fork Skykomish River valley, within the Skykomish Ranger District, Mt. Baker-Snoqualmie National Forest. The roadway is located in unincorporated Snohomish County, Washington upstream from the town of Index.

Project Description

The project will construct a relocated roadway that will extend from an area in proximity to the lower washout at Index-Galena Road MP 6.4 to an area in proximity to the upper washout at MP 6.9. The roadway will be relocated landward from the North Fork Skykomish River outside of the floodplain and channel migration zone. The relocated roadway will re-establish roadway connectivity on Index-Galena Road for residences, emergency service providers, recreationists, and NFS land.

At the beginning point of the relocation, the roadway will ascend the sideslopes at a 9 percent grade to raise the roadway out of the 100-year floodplain and channel migration zone. To accommodate the realignment, the project will require extensive soil excavation and would place fill in other areas. A new Index-Galena Road-Trout Creek Road intersection would be constructed to allow for future continued use of Trout Creek Road by the USFS to carry out its long-term land management plans in the Trout Creek sub-basin. The relocated roadway will cross sideslopes and parallel the existing roadway. Non-fish bearing streams will be crossed by the alignment. A new 180-foot bridge with a deep drilled-shaft foundation will be constructed at a stream crossing near Station 54+00, at the east end of the project.

The proposed roadway design is based on design standards contained in the 2001 AASHTO Guidelines for Geometric Design of Very Low-Volume Roadways (ADT < 400). The use of these design standards responds to comments made by the public during the NEPA scoping period to consider use of design standards that would help to reduce the footprint of the proposed roadway relocation repair.

The proposed design will include a pavement width of 22 feet with 10-foot travel lanes and 1-foot shoulders. Additional land area will be required to install guardrail where warranted. The roadway posted speed limit will be 35 mph.

The proposed project’s new alignment on NFS lands in the Mt. Baker-Snoqualmie National Forest will require a new right-of-way easement from the USFS to Snohomish County through FHWA. The existing right-of-way easement would be combined with the new easement area and includes the damaged roadway that will be decommissioned and restored where feasible to natural riparian conditions. The restored areas and adjacent areas downslope from the roadway will be used for roadway stormwater runoff dispersion and will be permanently protected from future development. FHWA, with the consent of the USFS, will grant an easement for approximately one mile of new roadway easement across NFS land.
Once the decommissioned roadway surface is removed, soil decompaction and placement of organic materials, including forest duff salvaged during clearing and grading, will prepare the site for restoration planting. This riparian mitigation will restore a forested riparian corridor adjacent to the North Fork Skykomish River. Where planting is not feasible, natural riparian conditions will be restored with the asphalt removal. Large woody debris will be placed to enhance in-stream habitat and will be placed within restoration areas to enhance wildlife habitat.

Mitigations and monitoring in the FONSI Appendix 2 Commitment List will be implemented as described.

**Environmental Review Process**

The proposed roadway alignment lies within the jurisdiction of both Snohomish County and the USFS. Snohomish County initiated the roadway design process in coordination with WSDOT, FHWA, and the USFS. Both FHWA and WSDOT are involved with roadway design guidance, NEPA compliance, and other federal environmental review oversight. The USFS, as the underlying land management agency for the land area affected by the project, is a cooperating NEPA agency, ensuring compliance with Mt. Baker Snoqualmie National Forest Plan requirements.

Land use actions occurring in the proposed project area are required to be consistent with the requirements of the National Forest Management Act (USC 1604(g)(3)(E)) and its implementing regulations (36 CFR 219). The proposed project must also conform to the Land and Resource Management Plan (LRMP) for the Mt. Baker-Snoqualmie National Forest, as amended (USDA, USDI 1994, 2001, 2004). The plan and its amendments are referred to collectively as the MBSNF Plan.

FHWA adequately addressed the potential environmental effects of actions associated with this proposal in its Index-Galena Road EA and FONSI, as required by the NEPA and other federal laws including the Endangered Species Act and National Historic Preservation Act. Impacts to resources are discussed in greater depth in the EA, including specific management objectives, standards and guidelines of the MBSNF Plan as noted below.

**Aquatic Conservation Strategy**

The Aquatic Conservation Strategy (ACS) is a primary component of the MBSNF Plan for the protection of aquatic and riparian-dependent species. The ACS was developed to restore and maintain the ecological health of watersheds and aquatic ecosystems contained with them on public lands. Designation of land areas as Riparian Reserves along with specific standards and guidelines to protect them are a component of the ACS. The Index-Galena Road project is located in designated Riparian Reserves.

There are nine objectives that collectively help to assure protection of the ecosystem functions provided by Riparian Reserve areas. These are described in the EA (pages 90-91). Applicable Riparian Reserve standards and guidelines from the MBSNF Plan are described in the EA (pages 91-92).
The standards and guidelines are designed to focus review of proposed projects to determine compatibility with ACS objectives. Project consistency determinations are made during review of a proposed project to determine whether projects “meet” ACS objectives. Alternatively, determinations may also conclude that a proposed project “does not prevent attainment.” Projects that do not maintain the existing condition or lead to improved conditions in the long term would be determined to not meet the intent of the ACS and would not be recommended for implementation or approval.

Overall, the Index-Galena Road Milepost 6.4-Milepost 6.9 project would help preserve key ecological functions of the designated Riparian Reserves in the project area. The project, designed to maintain existing roadway access to land areas in the upper North Fork Skykomish River watershed, would have temporary impacts to the watershed during construction, but through project design, mitigation measures and best management practices as described in the EA, and FONSI Appendix 2, the project would be consistent with ACS objectives at the site and watershed scales.

The project as proposed would be consistent with ACS objectives by relocating the roadway from the river and floodplain. This would contribute to maintaining diversity and complexity of watershed features by restoring free flow of the North Fork Skykomish River. Relocation enables the existing damaged roadway asphalt to be removed and natural riparian site conditions to be restored. This promotes aquatic restoration including benefits to in-stream habitat, and the adjacent riparian habitat that would provide greater habitat diversity and promote enhanced wildlife habitat conditions in proximity to the river.

Removal of the existing roadway and relocation further landward is expected to enhance aquatic refugia as side channel development over time has a positive effect on riparian connectivity. Similarly, the project is not expected to obstruct the movement of terrestrial species, dependent upon riparian corridors for their habitat needs or movement between habitat areas.

Relocating Index-Galena Road would help to prevent catastrophic roadway failure for the long term, eliminating a source of material that could be potentially introduced to the river that does not promote healthy riparian, aquatic ecosystems. Short term water quality impacts associated with construction would be managed by implementing project sedimentation control best management practices. All stormwater runoff on the completed roadway would be dispersed on the downslope adjacent areas, before sheet flowing and infiltrating through vegetated buffer areas. This process would filter and infiltrate the runoff. Thus, no measurable increases in the concentration or loading of stormwater contaminants would be expected to enter the river.

The completed project would contribute to maintaining stream flows because stormwater associated with the project is not expected to alter the hydrologic cycle, including low or peak river flows. Relocating the roadway further landward out of the floodplain would reduce the potential for floodwaters to overtop roadway surfaces, erode roadway prisms and associated roadway embankments.
The current floodplain function would be maintained and conveyance improved with the project due to the removal of the damaged roadway from the floodplain, relocation of the roadway above the floodplain, and restoration of more natural vegetated buffer floodplain conditions. The project would enable more extensive floodplain inundation than currently exists with the existing roadway. Floodplain connectivity would be enhanced with removal of obstacles and constructions presented by the existing roadway and its roadway prism. This would improve flood conveyance in the project area and not contribute to elevated flood flows.

The project as proposed would be consistent with Riparian Reserves standards and guidelines that apply to the Index-Galena Road project. Road design and operation and maintenance will promote attainment of Aquatic Conservation Strategy objectives.

**Wilderness**

Index-Galena Road is one of the principal vehicular access routes to the Wild Sky Wilderness, although it is located outside of the boundaries of the Wild Sky Wilderness. Therefore, no designated wilderness areas would be affected. Opening of the relocated roadway would likely attract additional recreational users to use the existing wilderness trail network that would match or result in an increase from previous use levels prior to the 2006 damage event.

**Wild and Scenic River**

The North Fork Skykomish River is recommended in the MBSNF Plan as a Wild and Scenic River, with a designation of Recreation in the Index-Galena Road project area (Management Allocation 5A). This designation extends from Troublesome Creek (near roadway MP 11) to the confluence with the South Fork Skykomish River. Recreation rivers are typically readily accessible by roads and usually have some level of development along their shorelines.

This recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the USFS, Secretary of Agriculture, and the President of the United States. Congress has reserved the authority to make final decisions on designation of rivers to be included in the National Wild and Scenic Rivers System. Until Congressional action, the values contributing to a river’s particular classification will be protected on NFS lands. Forest lands in the 1/4 mile corridor on each side of the rivers are managed to maintain the river’s eligibility.

The project’s proposed relocation of the Index-Galena road, including roadway pavement removal from the river side channel and restoration of riparian areas to natural conditions, would promote protection from degradation the outstanding remarkable values and wild, scenic, and recreation characteristics of the North Fork Skykomish River. The proposed project would include maintaining natural conditions in streamside bank areas so that water quality can be maintained to keep rivers fishable and swimmable. Access to the river for recreation will be maintained by providing parking at M.P. 6.9 for kayaking and fishing.
Roadway construction would not occur in the bed or on the banks of the river, and would require minimal vegetation removal adjacent to the river’s side channel. Accordingly, the project is not expected to adversely affect outstandingly remarkable values for which the river was recommended for future Wild and Scenic River designation. The relocated roadway would be screened from the river’s main channel by vegetation in most areas, but would be visible from some areas along the side channel until riparian vegetation becomes established in the area where asphalt would be removed and planted. This mitigation work would enhance outstandingly remarkable values in this reach of the river.

The Index-Galena Road relocation would protect and enhance the free-flowing condition, water quality, and outstandingly remarkable values of the North Fork Skykomish River. The relocation is designed to prevent repeated roadway washouts (and resultant effects) that Index-Galena Road has experienced in past events.

**Visual Quality**

Design elements incorporated into the project promote consistency with USFS visual quality objectives as outlined in the MBSNF Plan. The project would consider several measures to reduce visual quality impacts associated with construction and operation of the proposed alternate route. Coordination of visual elements, such as signing, lighting, paving textures, and wall color and texture would be planned for the roadway corridor.

Other measures to improve the aesthetics of the hard features of the project such as retaining walls, culverts, and guardrails would be incorporated in the final plans to promote consistency with USFS Partial Retention visual quality standards that require avoiding and minimizing impacts to middle ground and background views in the viewshed. Partial Retention standards recognize that human activity may be evident, but must remain subordinate to the characteristic landscape. Partial retention also applies in foreground views but modification may be used for necessary structural facilities. The specific mitigation measures that would be used to provide texture finishes and colors consistent with USFS standards and guidelines are described in the EA (page 135), and FONSI Appendix 2. The proposed measures would be consistent with MBSNF Plan visual quality objectives.

**Forest Plan Botanical, Wildlife and Fish Species**

The USFS performed botanical surveys of the project area. No rare plants, including Forest Service Region Six Sensitive and Survey and Manage species were observed during the project’s botanical field work (EA, page 70). No Federally Threatened, Endangered or species proposed for federal listing are known to occur on the Mt. Baker-Snoqualmie National Forest.

Invasive non-native plant species are present in the project area. The existing damaged paved road is more or less lined with the invasives such as herb Robert (Geranium robertianum) and creeping buttercup (Ranunculus repens). There are also some large patches of invasive reed canarygrass (Phalaris arundinacea) and a relatively small infestation of Japanese knotweed (Polygonum cuspidatum) at the western end of the project where the alignment intersects with Trout Creek Road. The Forest Service requirement to treat these invasive species with herbicides and other mitigation measures prior to construction will be met (EA, page 70).
All Forest Service Sensitive, Management Indicator, and Survey and Manage wildlife species were evaluated in the Wildlife Discipline Report and findings were summarized in the EA (pages 74-76). Wildlife species in which individuals may be impacted but would not trend the species toward federal listing under ESA include pileated woodpecker, Townsend’s big-eared bat, American pine marten, Columbian black-tailed deer, primary cavity excavators, and migratory birds. The project would not adversely affect deer or elk winter range (Management Allocation 14) due to the small size and scope of tree falling for the new road relative to the potential habitat in the greater project area (EA, page 97). The project would not occur during the winter range season of December 1 to April 15.

Two Forest Service Sensitive fish species known to occur in the North Fork Skykomish River were evaluated in the Fisheries Discipline Report, (Coho salmon, sea-run cutthroat trout), with findings summarized in the EA (page 61). The project may impact individuals, but is not likely to trend the species toward federal listing. Implementation of mitigation measures (EA page 62), and Terms and Conditions as required by the Biological Opinions of the U.S. Fish and Wildlife Service and National Marine Fisheries Service (FONSI, pages 16-22) to reduce impacts to Federally-listed ESA fish species will contribute to minimizing impacts to Forest Service Sensitive fish species.

Conclusion

I concur with the actions and environmental effects analysis in the Index-Galena Road EA and FONSI. The project would adhere to USFS requirements associated with relocating the existing roadway to a new alignment and right-of-way easement.

In accordance with a Memorandum of Understanding between FHWA and the USFS (1998, amended 2003), FHWA should request to the Forest Service an appropriation of NFS lands for a DOT easement, including a proposed easement plat and legal description of the easement area. Upon receipt of FHWA’s request, the Forest Service will review the exhibits and process a Letter of Consent to FHWA for granting the DOT easement to Snohomish County (the Highway Agent). The Letter of Consent will include standard stipulations to protect adjacent Forest lands.

For more information, please contact Eric Ozog, Realty Specialist, at (360) 691-4396 or via email at eozog@fs.fed.us.

Sincerely,

JAMIE KINGSBURY
Forest Supervisor

cc: Joe Neal, Eric Ozog, Melissa Shelley