



Washington Trails Association

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September 8, 2016

Sent via electronic email to: objections-pnw-mtbaker-snoqualmie@fs.fed.us

Forest Supervisor Jamie Kingsbury
Objection Reviewing Officer
Mt. Baker-Snoqualmie National Forest
Attn. 1570 Appeals and Objections
2930 Wetmore Ave.
Everett, 98201

Re: OBJECTION - Upper North Fork Nooksack River Access and Travel Management Project

To Forest Supervisor Jamie Kingsbury:

Washington Trails Association submits the following objection to the U.S. Forest Service's decision to select Modified Alternative B, a combination of the alternatives analyzed in the North Fork Nooksack Access and Travel Management Project Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA). In a draft Decision Notice and Finding of No Significant Impact (FONSI) to be signed by Mt. Baker District Ranger Erin Uloth, the Forest Service selected attributes of all alternatives, including maintaining as open major arterial roads and major spur roads to important access points, and decommissioning 31 miles of closed roads and 7 miles of open roads on the Mt. Baker Ranger District of the Mt. Baker-Snoqualmie National Forest.

As required by 36 C.F.R. § 218.8(d), the lead objector's name, address, and telephone number:

Andrea Imler
Washington Trails Association
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1. Interests and participation of objecting party.

Founded in 1966, Washington Trails Association is the country's largest state-based trail maintenance and hiking advocacy non-profit organization with more than 14,000 members. WTA's mission is to "preserve, enhance, and promote hiking opportunities in Washington state through collaboration, education, advocacy and volunteer trail maintenance." For nearly 50 years, WTA has focused on helping Washingtonians get on trail to experience the great outdoors in our state and national parks, national forests and other public lands with an emphasis on ensuring the

sustainability of trails and making outdoor experiences fulfilling and fun for hikers. The primary way that hikers reach trails is by their personal motorized vehicles on national forest roads. WTA has been a regular and active voice and participant in public lands road and access issues on the Mt. Baker-Snoqualmie National Forest. We submitted timely scoping comments on the project in a joint comment letter and submitted timely comments on the draft EA in a joint comment letter. Washington Trails Association has organizational interests in the proper and lawful management of the forest road system and its associated impacts on the Mt. Baker National Forest's wildlife and wild places.

2. We support the Forest Service's efforts to create a resilient future road network that provides continued access to the Upper North Fork Nooksack River's recreational trails and facilities.

Identifying a resilient future road network is one of the most important endeavors the Forest Service can undertake to restore aquatic systems and wildlife habitat, facilitate adaptation to climate change, enhance recreation and lower operating expenses. And it is a win-win-win approach: (1) it's a win for the Forest Service's budget, closing the gap between maintenance needs and congressional appropriations; (2) it's a win for wildlife and natural resources because it reduces negative impacts from the forest road system; and (3) it's a win for the public because removing unneeded roads from the landscape allows the agency to focus its limited resources on the roads we all use, improving public access across the forest.

We are very encouraged to see the Forest Service considering the Mt. Baker Ranger District's road system on a watershed scale. We strongly support the agency's thoughtful, strategic approach to improving public access to the forest, reducing negative impacts from forest roads to water quality and aquatic habitats, and improving watersheds and forest resiliency by returning expensive, deteriorating, and seldom used forest roads to the wild.

3. Parts of the project identified for objection with statement of reasons in support of Washington Trails Association's objection and suggested remedies.

- **The Draft Decision Notice and Finding of No Significant Impact closes upper Wells Creek Road (FSR 33) to motorized vehicles permanently, effectively eliminating motorized vehicle access to the Cougar Divide trail -- an inventoried trail on the Mt. Baker-Snoqualmie National Forest.**

In the March 6, 2016 Draft Environmental Analysis joint comment letter that WTA submitted with other organizations, we commented that the Forest Service should prioritize continued access and maintenance of recreational access routes.

The three stated purposes of the Access and Travel Management Plan are stated in the Draft Environmental Analysis on page 13:

- 1.) Restore and protect the project area's ecology from impacts of the road system.
- 2.) Establish a sustainable road system in the project area.
- 3.) Maintain access across the forest for a variety of users (e.g., Tribal, recreation)**

Closing the upper Wells Creek Road limits for a variety of users, including those who have mobility issues.

In the Draft Environmental Analysis on page 138, the Forest Service states:

"The proposed closure of Wells Creek Road would have an effect on access to one undeveloped trailhead and one trail. The Cougar Divide Trail #601 leaves from the end of the road and follows the ridge bordering Mt. Baker

Wilderness until entering the wilderness and the Ronald J. Taylor Research Natural Area at 1.5 miles. Use counts have not been collected for this trail.”

The Forest Service continues by stating:

“The Cougar Divide Trail would be orphaned by this closure and would be removed from the Forest trail system. As this trail is more lightly used, the removal of it would result in a reduction in the variety of system trails available to the public.”

Since the Forest Service admits that use counts have not been conducted on this trail, WTA objects to the statement above that says “this trail is more lightly used” and agrees that there would be a “reduction in the variety of system trails available to the public.”

Remedy: The Forest Service should continue the seasonal closure of the Wells Creek Road from November 1st to July 1st to protect wildlife habitat, but provide motorized vehicle access to the upper Wells Creek Road the other four months.

Conclusion

Washington Trails Association appreciates your consideration of the concern addressed in this objection. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrea J. Imler", with a stylized, flowing script.

Andrea Imler
Advocacy Director