To: Forest Supervisor
Attn: Objections

September 12, 2016

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

Via email: objections-pnw-mtbaker- snoqualmie@fs.fed.us

RE: Upper North Fork Nooksack Access and Travel Management (ATM) Project OBJECTION

Pursuant to 36 C.F.R Part 218, Subpart B, the Mt. Baker REFORM (Recreation Enthusiast for our Road Maintenance) files this objection to the proposed decision for the Upper North Fork Nooksack Access and Travel Management (ATM) Project (herein referred to as "Nooksack ATM"). The responsible official is Erin Uloth, Mt. Baker District Ranger. The Nooksack ATM project occurs on the Mt. Baker Ranger District of the Mt. Baker – Snoqualmie National Forest.

Objector

Mt. Baker REFORM is providing support of Objectors' comments issued as Appendix D of the Final Environmental Assessment dated July 29, 2016. Mt. Baker REFORM members attended public meetings and have commented directly to the Mt. Baker Ranger in regards to the concerns with the proposal. Specifically, we provide support of comments requesting road maintenance to allow public access by all users; allowing volunteer groups to assist with preventative road work and recognizing road access is crucial to our local economy.

Reasons for the Objection

The content of this objection is Mt. Baker REFORM has strong concern that the Draft Decision Notice and Finding of No Significant Impact statement dated July 29, 2016, presents new information not presented in the Nooksack ATM, and pursuant to 36 CFR Part 218.7(c)(2)(ii), **modified** Alternative B was not given designated opportunities for public comment. Secondly, objection is based on previously submitted public comments, which Mt. Baker REFORM is submitting a statement of community support in maintaining our forest roads for recreation and public access, as it affects the viability of the local economy.

Mt. Baker REFORM provides the following descriptions on those aspects of the project NOT addressed in the Nooksack ATM, and issues regarding new information presented as Modified Alternative B, and suggested remedies to resolve the objection:

- As outlined in the table below, the Final EA Proposed Alternative B actions compared to the **modified** Alternative B actions. These proposed actions introduce major modification on seasonal and scheduled closures to public access, specifically to motorized vehicles; and represents new information which has not been allowed adequate public review or comment.

Proposed Actions	Alternative Plan B	Modified Alternative B
Maint Level 3	40 miles	57 miles
Maint Level 2	74 miles	36 miles
Decommision Roads	6 miles with 5 currently closed	38 miles would be decommissioned (7 miles currently opened)
Close Roads to Vehicles		Keep 36 miles of currently closed roads, closed to vehicle access
Close Roads to Public Access	Close 18 miles	*Close 28 miles to public vehicle access.

*11 miles would be administrative and in some cases, Tribal vehicle access only.
The modified Alternative B includes, keeping 36 miles of currently closed roads **permanently** closed to vehicle access and closing an additional 11 miles of roads **strictly to public access**. It appears the roads will be closed to the public; however, maintained for select user groups? How is this decision supported within the context of road maintenance budgets and more importantly, how does this meet the Northwest Forest Plan? This information was not discussed within the Nooksack ATM. Mt. Baker REFORM is objecting the decision and requesting the Nooksack ATM follow Alternative Plan B.

- The Nooksack ATM did not provide information or language describing seasonal or scheduled closures and how it would affect user groups. Shown in Table 1 of the modified plan, Seasonal Closures Scheduled for the Project Area under this decision, Glacier Creek Road (FSR 39) will be closed in winter once Canyon Creek Road (FSR 31) is open. The table does not address where the closure will occur, nor if winter access will be allowed to the snowmobile community. Mt. Baker REFORM is objecting Table 1 actions until further discussion of the impacts these closures will have on the community and user groups.

- Mt. Baker REFORM objects to modified Alternative B as the actions and language seem to blur into Alternative Plan C. Public comments submitted were clearly in support of Alternative Plan B and support seeking solutions to maintain public access. To reiterate public comment (#22, page 184 Final EA) and the response:

"Road closures will have a negative effect on my quality of life in both recreation and financially. These actions also have a terrible financial impact to our community… The

only option… is to figure a way to work with public (user groups) or any other ways to source outside funding…"

Response: The Forest Service has benefitted greatly from volunteer efforts the past number of years, and will continue to pursue and grow these relationships. Volunteer work can make a substantial difference in the agency's ability to maintain roads.

Resolution Requested

Mt. Baker REFORM requests that remedies/alternatives suggested below be included in an updated EA and/or clarified in supporting documentation.

1. The Nooksack ATM and Record of Decision should support Alternative Plan B actions to maintain public access and support the socio-economic factors of the community. The Record of Decision is a modified alternative that was not allowed adequate public review.

2. Further explicit detail of scheduled and seasonal closures should be presented to the public for comment and should be vetted with the community to provide clarity of timelines and expected solutions. Further clarity on the definition between motorized vehicles and wheeled vehicles is suggested. This would further allow the interested public and those affected to determine the impact of these decisions and to seek positive solutions of preventive road maintenance, which is a necessary component of the proposal.

3. The Nooksack ATM should not discriminate public access by supporting road closures specific to private users. Recognizing treaty rights and tribal access is a requirement in the review process; however, closing public access while maintaining roads for private uses is outside the scope of the Nooksack ATM.

4. Mt. Baker REFORM requests implementation of Alternative B for the Nooksack ATM, and requests proactive engagement by the Forest Service and interested volunteer groups to assist with preventive road maintenance requirements. There has been active participation and success with volunteers, along with growing interest from the community to continue these efforts.

Request for Resolution Meeting

Pursuant to 36 CFR 218.11, the objectors request a meeting with the reviewing officer to discuss the issues raised in this objection and potential resolution.

In the event multiple objections are filed on this decision, Mt. Baker REFORM respectfully requests the resolution meeting be held as soon as possible with all objectors' present. Mt. Baker REFORM believes that having all objectors together at one time, though may require a longer meeting, will provide for more expeditious process to either resolve appeal issues or move the process forward. With that in mind, Mt. Baker REFORM requests to participate to the maximum extent practicable, and specifically requests to provide comments on point with other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. Mt. Baker REFORM looks forward to our initial resolution meeting. Please contact our representative, Lesley Rosten, at the email address: Bakerbiler@gmail.com, to arrange a date for the resolution meeting.

Sincerely,

Joanne Rowe
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425-879-8192

Joanne Rowe