



Washington Trails Association

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June 29, 2020

Erin Uloth
District Ranger, Mt. Baker Ranger District
Mt. Baker-Snoqualmie National Forest

RE: North Fork Nooksack Vegetation Management Project

Dear District Ranger Uloth,

Thank you for the opportunity to provide comment on the public scoping letter for the North Fork Nooksack Vegetation Management Project. As the Upper North Fork Nooksack River Watershed is an area brimming with outdoor recreation opportunities and is popular with hikers, Washington Trails Association is pleased to provide comments on this proposal.

Washington Trails Association has a more than 50-year legacy of engaging the hiking community. WTA enhances hiking experiences in Washington state by empowering a diverse and growing community of hikers to explore, steward and protect trails and public lands. WTA is the nation's largest state-based trail maintenance and hiking advocacy nonprofit organization, with more than 24,000 member households and an online community of more than 100,000. Each year almost 4,500 WTA volunteers perform over 160,000 hours of trail maintenance across the state.

Understanding the context of this vegetation management plan, built out of prior work on the Nooksack Integrated Conservation and Enhancement and new analysis, we are appreciative of this project's intent to improve access to a popular recreation area, enhance wildlife habitat, and support the local economy. These aspects of work are critical to ensuring that the Mt. Baker Ranger District offers sustainable recreation with beautiful areas for hikers to enjoy. At this point in the project development process, we are interested in learning more about the Forest Service's proposed vegetation management activities and their potential effects on the forest ecosystems, aquatic resources and recreation of North Fork Nooksack landscape. As your work on this project develops and you prepare a Draft Environmental Analysis, we offer the following comments to address potential impacts to recreation from this project:

Consider including stewardship contracts as a way to ensure revenues generated in the NF Nooksack Project area can support ecological restoration and recreation projects.

As an organization that conducts trail maintenance regularly in this area, the potential for revenues to support local ecological restoration and recreation projects is of particular interest. We encourage you to work with interested partners to demonstrate an engaged collaborative, so that stewardship contracts can become a part of this plan and support the ongoing needs to make trails more sustainable in the area.

Outline potential impacts or changes trailheads, specifically around Damfino Lakes.

We encourage further details in the Environmental Assessment on any changes to trailheads that would impact access to recreation opportunities in the area, specifically at Damfino Lakes. This project area includes the popular Damfino Lakes trail that provides an easier connection to the High Divide, a stunning 7 mile ridge ramble, as well as the Canyon Ridge trail and the Boundary Way trail. Other trailheads impacted would be Welcome Pass as well as Heliotrope Ridge trail, the main northern climbing route for Mt. Baker which is especially popular with WTA's community, receiving 70 trip reports dating back to 2019. Details about how these thinning efforts may impact the experience of hikers will help us communicate this to our community.

Use common mitigation and improvement measures to reduce visual impacts to recreation sites and hindrances to recreational access during project work.

As the ongoing project work for this vegetation management plan may have a visual impact to recreation sites and impede recreational access, we encourage you to apply the following set of mitigation measures to reduce user conflict and ensure hikers can access the project area while work is being conducted:

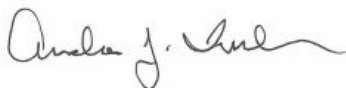
- Incorporate scenery management techniques such as visual screening, feathering vegetation and low stump cutting;
- Provide recreation site improvements such as trail reroutes and trailhead parking lot modifications;
- Reduce the closure period to no more than 2 months during the peak season (May through September) and 4 months during non-peak season;
- Limit any logging-related special closure(s) of highly desired recreation sites for the non-peak recreation season (October through April);
- Limit trail access and closures to just two recreation sites at any one time during the non-peak recreation season;
- Provide public access during the peak and non-peak recreation seasons through or near units being thinned to reach developed and dispersed recreation sites on weekends, beginning on Friday at noon through Monday at noon, and extend the opening for holidays.

Include public involvement and outreach opportunities as you move forward with this project.

Given the scope of the North Fork Nooksack Vegetation Management Project and the potential impacts to popular trails and recreation sites, WTA recommends ongoing outreach and public involvement with the project in addition to the formal public process.

Thank you for considering our scoping comments on the North Fork Nooksack Vegetation Management Project. We appreciate the opportunity to engage in this project, and are grateful of the work you have done thus far to build a sustainable recreation environment on the Mt. Baker Ranger District. We look forward to learning more about the project as it develops.

Sincerely,



Andrea Imler
Advocacy Director