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Washington Trails Association (WTA) appreciates the opportunity to provide comments on the landscape analysis within the Carbon River watershed. With the recent closure of the Fairfax Bridge, which provides critical access to the Carbon River corridor, we are in a pivotal moment of planning for the future of this area. We appreciate the opportunity to contribute our thoughts on trails and access to Forest Service lands in the Carbon through the landscape analysis.

The Carbon River Landscape Analysis addresses needs to protect and enhance Tribal resources, enhance the development of late-successional and old-growth forest habitats, enhance the health of rivers and streams and associated aquatic ecosystems, and promote ecologically sustainable recreation and manage human health and safety. Being so rich in natural and cultural resources, we understand why the Forest Service is taking a holistic approach to proposing actions across these interconnected project needs. WTA will focus our comments on impacts to recreation, which can be found across the project's proposals - from "reducing recreation impacts" under the Protect and enhance Tribal resources need (pg 6) to "[promoting] ecologically sustainable recreation" to "balance [the Forest Service's] responsibilities" (pg 7).

Washington Trails Association (WTA) has a more than 50-year legacy of engaging the hiking community. WTA enhances hiking experiences across the 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 26,000 member households. In 2024, WTA crews largely composed of volunteers performed approximately 127,144 hours of trail maintenance (\$4.78 million in donated labor). In addition to volunteer stewardship, WTA is a trusted source for hiking information that is accessed by hundreds of thousands of outdoor enthusiasts each year. It is WTA's privilege to work closely with the staff of the Mt. Baker-Snoqualmie National Forest on projects large and small. Since 2022, WTA has worked with landowners and community members within the Carbon River Corridor to advance the visitor and resident experience on recreational lands in the Carbon River area.

#### Tribal Engagement

WTA is supportive of the integration of Tribal treaty protections throughout the environmental analysis. We see various actions proposed from the "need to balance our responsibilities to manage public safety, improve ecological conditions, and protect tribal and treaty rights and access over the long-term" (pg 7), paired with care and stewardship of the beloved recreation opportunity in the Carbon. We know that the Clearwater Wilderness and Carbon River Corridor is a place full of critical flora, fauna and cultural resources to area Tribes. We appreciate the Forest's "need to increase co-stewardship between the Forest Service and Tribal Nations through collaborating on projects." (pg 6) WTA encourages continued engagement with Tribes throughout this landscape analysis process, during implementation and in future stewardship of this project area.

We understand that the Carbon River area has great cultural significance. It is also a popular area that draws many types of recreational visitors. WTA is committed to creating and advocating for sustainable trail systems that minimize the impacts of visitors while ensuring that the benefits of hiking, such as mental, physical, spiritual health and well-being are also supported. We appreciate the places in the landscape analysis where solutions are offered to maintain recreation experiences alongside recommendations that may change types of access (i.e. day-use conversions where campsites are in sensitive areas). We hope continued collaboration with Tribes, the Forest Service and trail users can result in balanced plans for the future.

## Forest Service Road 78 and 7810 Bridge (pg 26)

WTA understands the Forest's approach to condition-based management given changing access throughout the Carbon Corridor. Given the significance of public lands access in the Carbon River Corridor beyond the Fairfax bridge, we support solutions to the bridge replacement that retain public access.

For the 78 road and 7810 bridge, we appreciate the concurrent goals to restore and maintain the health and function of the river and maintain vehicular access to Forest Service land north of the Carbon River. We are happy to see that the Forest Service plans for continued access and enjoyment of the Clearwater Wilderness and Summit Lake area trails through this critical access point in the Carbon.

Before supporting Option 2 to construct a new trailhead after bridge decommissioning, WTA would like to see finer details on how the trail construction would add mileage or difficulty to hikes like Summit Lake, Coplay Lake, and other trails in the Clearwater Wilderness. The EA states that the two options for access are to maintain "vehicular access, or an additional mile of trail originating from a newly established entrance on MRNP property further west along FSR 78" (pg 26/27). A one-mile, one-way trail extension takes the Summit Lake trail from being around six miles roundtrip to around eight. Grade is not mentioned. As the Forest Service considers future opportunities for recreation in the Clearwater Wilderness using the Carbon River entrance, a trail extension beginning across the Carbon River may necessitate additional mileage to any future ideas. The area around Summit Lake is popular due to various factors that make for good experiences for a wide variety of visitors. Access that shifts the hiking experience to be longer or more difficult can undercut key attributes of the hiking experience that make the area so popular, like its family-friendliness or the opportunity for half-day experiences.

Due to the potential for trailhead relocations to reduce the accessibility of these major hikes in the Carbon, WTA prefers Option 1: FSR 78 Reroute and 7810 Bridge Extension. This option preserves the accessibility and experience of nearby hikes while confronting the necessary changes to infrastructure needed to support the Carbon River floodplain. By retaining vehicular access through a road and bridge extension, Summit Lake and Coplay Lakes maintain qualities of length and difficulty that we know visitors value. The road and bridge extension also lend to more expansive future planning for recreation in the Clearwater Wilderness by opening up trail planning for a wider variety of experiences that don't necessitate an initial hike in.

We understand that trailhead relocations can also be opportunities for an improved trail experience and/or to retain access in cases where alternative access solutions are too costly or complex. For this reason, while we prefer Option 1, we see the value in either option proposed, as long as public access is retained. Washington Trails Association staff are experts on trail design and layout. We work closely with the Mt. Baker-Snoqualmie on issues of visitor use management. Regardless of the option selected by the Forest, please include WTA in conversations about future use and access to trails in this area.

## Summit Lake Revegetation (pg 16)

With stunning views and balanced mileage and elevation gain, Summit and Coplay lakes are key draws of visitation in the Carbon and important recreation experiences for a diverse pool of hikers. These trails are essential pieces of the limited recreation infrastructure that allow people to explore public lands in the area. The two lake trails are the only places to see Mount Rainier outside of the national park in the Carbon River area. The Summit and Coplay Lake trails are iconic hikes that are on many must-do hiking lists, for hikers recreating locally, coming from the Puget Sound, to families and beyond.

Maintaining high levels of access and opportunities for enjoyment in the Summit Lake area are critical to preserve. We are supportive of efforts to increase resilience in the environment (converting campsites in sensitive areas to day-use, pg 16) while offering hikers continued enjoyment of the lakes, especially when paired

with the proposal to retain "lake access and campsites in less sensitive areas" (pg 16). Restoration will be most successful if treatments and closures are designed in such a manner that they are intuitive and provide alternative, equal opportunities for recreators to enjoy experiences similar to those being changed. Camping is an attractive use at Summit and Coplay lakes. The conversion of campsites in sensitive areas to be day-use only will best achieve efforts to revegetate the lakefront if hikers are offered substitute options to camp. WTA suggests planning for campsite opportunities that both are suitable for less-impactful areas and reflect demand - in other words, fully replacing the converted campsites into usable designated campsites in better locations.

In the 2024 Carbon River Landscape Analysis scoping document, the Forest Service proposed new parking opportunities to alleviate unsafe parking conditions at Summit and Coplay Lake, lake broadwalks, new campsites, new toilets and signage at trails. While capacity and further analysis may have excluded these recommendations from this analysis, WTA remains supportive and hopeful that further investments in trail infrastructure that will minimize visitor impact can be explored in the Clearwater Wilderness.

#### Celery Meadows Trailhead Relocation (pg 28)

We are supportive of the Forest Service's recommendation to shift the Celery Meadows Trailhead by 0.13 miles to better align current use with the designated trail.

WTA envisions a future for the Carbon River area where popular recreation sites are preserved and accessible, investments improve visitor experiences and negative impacts on natural and cultural resources are minimized. Recreation plays a critical role in the economy of Carbon River towns and in the lives of people who reside in them. We appreciate this analysis' intention to plan for continued public access of trails.

Thank you for considering our feedback on the Carbon River Landscape Analysis. We look forward to continuing to work with you and the community in this region.

Sincerely,

Cassidy Giampetro  
Advocacy Manager