

Data Submitted (UTC 11): 4/3/2021 12:04:04 AM

First name: Betsy

Last name: Robblee

Organization: The Mountaineers

Title: Conservation and Advocacy Director

Comments: April 2, 2021

Greta Smith

District Ranger, Mt. Baker Ranger District

Mt. Baker-Snoqualmie National Forest

RE: North Fork Nooksack Vegetation Management Project, Draft Environmental Assessment

Dear District Ranger Smith,

On behalf of The Mountaineers, thank you for the opportunity to provide comments on the Environmental Assessment document for the North Fork Nooksack Vegetation Management Project.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,600 skilled volunteers lead 3,200 outdoor education trips and courses annually for 14,000 members. Our youth programs provide over 10,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

As a conservation-oriented recreation organization based in Western Washington, we have a strong interest in current and future management activities in the Mt. Baker-Snoqualmie National Forest. We are appreciative of aspects of the NF Nooksack Vegetation Project that seek to restore ecological processes, enhance wildlife habitat, and improve the landscape for recreationists in the long-term. In general, we support Alternative 2 with some modifications described below. We associate ourselves with the comments provided by Washington Trails Association and reiterate their good points.

As indicated in the Recreation Resource Effects Analysis supplemental document provided, the project area provides access to recreational opportunities that are important to The Mountaineers community. We are particularly interested in Heliotrope Ridge trailhead, which provides access to heavily used climbing areas on Mount Baker: the popular Coleman-Deming climbing route, the Lower Coleman Glacier and Seracs, and the North Ridge climbing route. The Mountaineers climbing courses conduct numerous trips in these areas to teach alpine climbing, ice climbing, and crevasse rescue. We are also interested in the Damfino Lakes Trailhead, which provides access to the High Divide trail and Excelsior Peak, as well as the Welcome Pass Trailhead - both popular hiking areas with our community. Given that the Recreation Resource Effects Analysis cites those areas as heavily impacted by the project, we are concerned by the potential impacts to recreation in these places.

We appreciate the analysis' efforts to outline popular recreation sites within the project area and their use periods, but feel the analysis falls short in addressing key items such as a recreation and access mitigation plan, for such a popular recreation area. We offer the suggestions below to ensure all measures to keep recreationists safe and aware of the project are taken into account.

Further define common mitigation and improvement measures to reduce hindrances to recreational access during project work.

As ongoing project work will impact recreation access, it is pivotal that the forest work with its recreation partners and the community to keep them safe and informed about potential changes to the area. Early coordination and communication of all closures and restrictions is essential to both our community and The Mountaineers as an outfitter and guide with priority use service days in the general area.

The information provided on page two of the Recreation Resource Effects Analysis that the summary table of recreation, "illustrates the recreation sites with the greatest concerns" and that these areas "could be affected by logging operation closures." In discussing how these areas may be impacted and how the forest will handle these issues, the document states that these areas "will need extra coordination and attention before and during logging operations between Silviculture and Recreation staff." We encourage the project staff to provide further details on what this coordination entails and how it will impact recreation closures and access. Many of these sites, especially the three sites indicated as having the greatest concerns - Heliotrope, Damfino Lakes, and High Divide/Welcome Pass - welcome visitors year-round (or when snow free) and are incredibly popular and important recreation opportunities in the watershed.

Further descriptions of the mitigation measures taken in areas impacted by logging operation closures should be provided with this Environmental Analysis. The current information is unclear as to what mitigation measures will actually be applied. The Gifford Pinchot National Forest's Upper Wind Environmental Assessment has provided an Appendix for "Mitigation Measures" that delineates the recreation mitigation measures that will take place for the project, and would be a useful template for this project's recreation measures.

As provided in scoping, we encourage you to consider mitigation and improvement measures to reduce user conflict and ensure recreationists can access the project area while work is being conducted:

- *Provide recreation site improvements such as trail reroutes and trailhead parking lot modifications;
- *Reduce the closure period as much as possible during the peak season (May through October) and consider impacts to winter recreation use during the non-peak season (November through April);
- *Limit any logging-related special closure(s) of highly desired recreation sites such as the Heliotrope Ridge Trailhead for the non-peak season (November through April);
- *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 and holidays; and
- *Incorporate scenery management techniques such as visual screening, feathering vegetation and low stump cutting.

In considering the nexus between recreation and the restoration work within this project, we also encourage you to consider reducing the size of thinning unit g36, surrounding Forest Road 39. Directly east of the thinning unit and surrounding Glacier Creek is a unique slot canyon that members of our canyoning community refer to as "The Gorge." Reducing the impacts to the visual corridor in the area will preserve this unique feature as a dispersed recreation opportunity. A mature canopy here is the most desirable long term goal for both slope stability and future access. The action prescribed should be either "none" or "stand improvement only" with mature canopy structure in mind.

Thank you for considering our comments on the North Fork Nooksack Vegetation Management Project Draft Environmental Assessment. We appreciate the opportunity to engage in this project, and are grateful of your work to facilitate sustainable recreation access in the Mt. Baker-Snoqualmie National Forest.