



Washington Trails Association

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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,

Thank you for the opportunity to provide comment on the Environmental Assessment document for the North Fork Nooksack Vegetation Management Project. The Upper North Fork Nooksack River Watershed is an area brimming with outdoor recreation opportunities and is popular amongst the hiking community. Washington Trails Association is pleased to provide comments on this proposal and state our support for Alternative 2 with some modifications that we describe below.

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 25,000 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.

We are appreciative of the work put into this vegetation management plan. Its work to identify restoration opportunities across the forest to prioritize areas where active management will contribute to restoring ecological patterns and processes at the sub watershed scale will improve the landscape for recreationists in the long-term. We offer our support for these objectives, and recognize that the scale of the project requires complex alternatives that balance the needs of the land and interests of stakeholders.

As indicated in the *Recreation Resource Effects Analysis* supplemental document provided, the project area provides access to an array of recreational opportunities that are important to WTA's member community. We appreciate the analysis' efforts to outline popular recreation sites within the project area and their use periods, but feel that 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 for this project will impede recreation access (indicated in the *Recreation Resource Effects Analysis*), 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.

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, suggested measures include:

- 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; and
- 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.

Before making your final decisions, we encourage that you consider including these added descriptions and mitigation measures, so that all communities that are impacted by this work stay informed in the process.

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 the project area, the potential for revenues to support local ecological restoration and recreation projects (ex. trailhead infrastructure) is of particular interest. The draft environmental assessment indicates on page 41 that “the only recreation related issues brought forth during scoping was public safety and public access to recreation sites and experiences” and that the Mt. Baker-Snoqualmie National Forest Land and Resource Management Plan standards and guidelines (4-84) address this issue. However, the standard and guidelines referenced in the plan do not address potential stewardship contracts that could be associated with this project. As a popular area for recreationists, we are hopeful that these types of contracts will be considered as a measure to allow revenues from the forest to support future restoration work.

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 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.

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.

Sincerely,

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

Andrea Imler
Advocacy Director