

Data Submitted (UTC 11): 4/13/2024 2:43:32 PM

First name: Jim

Last name: Scarborough

Organization: North Cascades Conservation Council

Title: Board of Directors

Comments: The North Cascades Conservation Council wishes to communicate the following issues of concern regarding the proposed "Temporary Winter Shelters" developed recreation project on the Mount Baker Ranger District. We expect these concerns will be fully addressed in the Forest Service's subsequent analysis for this proposal.

These Temporary Winter Shelters (TWS) will be centrally if not entirely intended for the use of snowmobilers, which of course are the majority winter user group among these particular areas. Three of these four sites, with the exception of the Baker Mountain Guides site near Twin Sisters, are accessed by motorized sno-parks, which require an individual annual or day vehicle pass with a sizable fee for their use.

These TWS sites with their stated intent of increasing users' comfort can reasonably be expected to increase recreational use in the adjacent montane, subalpine, and alpine zones -- likely to a significant extent. The Mount Baker Ranger District is already beset with an explosion of human recreation and its inevitable degradation to natural systems, which we have previously communicated to you in personal conversation. To date, the Forest Service has offered no publicly-available study of this ranger district's carrying capacity for recreational use, relative to past, current, and future projected levels of the same.

The clear need of a recreational carrying capacity analysis is particularly important in light of the November '23 listing of *Gulo gulo* as threatened under the Endangered Species Act. Although critical habitat for the wolverine has not yet been designated, this largest of the mustelids does inhabit the west slope of the North Cascades, as personally observed by our members. See also <https://www.inaturalist.org/observations/122174779>. Wolverines are known to be highly sensitive to human disturbance, particularly of the motorized kind. The Forest Service must not greenlight this project until the agency has clarified through rigorous analysis the likelihood of harm to the local, extant wolverine population.

Secondly, there is the question of snowmobile trespass in the Mount Baker Wilderness Area and Noisy-Diobsud Wilderness Area, which are in close proximity to the proposed TWS sites and easily penetrated by modern snow machines. Such trespass already occurs with regularity, though the Forest Service has not quantified its frequency. With the TWS sites being reasonably expected to increase snowmobile use, it can be deduced that its segment of motorized trespassers in Wilderness will increase as well, thus further damaging the resource. It does appear, at least, that the Baker Mountain Guides site will instead target a mountaineering clientele.

The North Cascades Conservation Council has a long history of supporting and engaging in traditional backcountry recreation across this region, and in doing so we've had an ample window of time to observe where excessive rec use begins to damage the very qualities that attract visitors in the first place. The Mount Baker Ranger District is on the verge of allowing a level of recreation that will cause a visible unraveling of the ecosystem. The Forest Service can take the modest step of paying more attention to this burgeoning problem by a good-faith analysis of this proposal's anticipated impacts to both wolverines and to designated Wilderness.