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Title:

Comments: March 28, 2022

District Ranger, Naches Ranger District

Okanogan-Wenatchee National Forest

10237 Hwy 12

Naches, WA 98937

RE: Public comment on Little Naches Upland Restoration (#58517), draft Environmental Assessment, dated February 2022

To District Ranger,

Regarding wildfire fuel reduction: An element of the EA as well as other public comments that I think is important to note is the importance of historical reference as well as future projections. To say that this area has not historically been affected by fires and will not be a problem in the future is a grave mistake. It is important to utilize all resources available to us to determine whether an area poses a wildfire fuel threat.

Regarding trails: Conservation is inspired by exposure. When one is exposed to the outdoors through recreation, has the opportunity to experience nature, to learn about nature, to grow an appreciation for nature... one is then inspired to steward the land. The desire to conserve cannot be achieved through inaccessibility.

The Little Naches area (including the project area) provides an exceptional recreation experience for both motorized and non-motorized recreationists alike. The views of Mt. Rainier and transition from west Cascades forest to east Cascades forest provides a unique opportunity for recreationists to connect with nature.

Before I continue, I'd request that a proper map be procured-one showing the trails in the area that this project proposal will effect.

I'd like to remind the USFS, as well as other recreationists, that Recreational Trails Program funding is how many of the trails, both motorized and non-motorized, are supported. The RTP funds come from the Federal Highway Trust Fund, and represent a portion of the motor fuel excise tax collected from nonhighway recreational fuel use: fuel used for off-highway recreation by snowmobiles, all-terrain vehicles, off-highway motorcycles, and off-highway light trucks. Non-highway vehicle recreation is estimated to generate \$300 million in fuel taxes annually. The RTP is funded at \$85 million annually. This money is then distributed to states, which select which projects to fund. Motorized tax dollars support the trails, and motorized recreationists should be able to enjoy access as much as any non-motorized user.

I am vehemently against the decommissioning of the 1906 road. The decommissioning of this road effects loop opportunities for highly prized motorized singletrack connecting the Middle Fork Trail #945. The Middle Fork Trail #945 has historical precedence, runs outside of the Wilderness area, and should be preserved as a motorized singletrack opportunity. The only way I would accept the 1906 road being decommissioned is if it were converted into multi-use MOTORIZED singletrack. Motorized trail groups and their volunteers have a longstanding history of providing critical maintenance to the trails in the greater Naches area. Converting this trail to motorized singletrack and partnering with the motorized trail groups would greatly benefit the Forest Service in both the implementation of said trail as well as its upkeep. In the interest of the watershed, should this trail take effect, I would like to see bridges implemented at any stream crossings.

When discussing logging operations, the project proposal reads that system trails and OHV routes will be "kept reasonably free of equipment, products, slash, and debris" but fails to outline what that entails. The project proposal also reads that "drainage and trail tread will be restored in accordance with Forest Service Trail Class Specifications in the event unintended impacts occur from harvest operations," but fails to outline how long those repairs could take, and thus, how long recreation would be impacted. As it stands, unmaintained trails are often put on the chopping block and if the restoration efforts were not performed timely, the recreation community should not be punished with permanent trail closures. That said, I would request that logging operations be required to clean up after themselves and clear the trails should their trees fall over the trails, that burn piles not be placed on "Protected Improvements", and that the trails and routes not have heavy equipment utilize them at any time.

Regarding motorized recreation at large: When considering motorized recreation on public lands, we should consider the economic benefit these recreationists bring to the table. Per the Economic Contribution of Off-Highway Vehicle Recreation in Colorado, dated 12/6/2016, NOHVCC summarizes that "during the 2014-2015 season, motorized recreational enthusiasts spent an estimated \$1.6 billion while taking trips using motorized vehicles for recreational purposes." Since 2015, the motorized recreation sector has boomed and it could be inferred that these numbers have increased. Motorized recreationists travel from all over Washington state, as well as the country, to experience the Okanogan-Wenatchee National Forest. The positive economic contribution that motorized recreationists bring is felt in the nearby counties of Kittitas, Yakima, Pierce and King.

I oppose the decommissioning of so many roads and unauthorized routes in this project proposal. Instead of closing road access, I want to see the USFS find an alternative that restores the roads in such a way where they are not impacting the watershed as much, and to designate the roads listed as they provide an invaluable recreation experience. Roads like those listed provide excellent hunting and gathering opportunities, as well as providing the disabled with a way to get out and experience the outdoors. We need to find an inclusive approach to recreation that does not only cater to non-motorized activities.

In my opposition of the decommissioning of roads and unauthorized routes, I have provided a list below:

*I do not support a year-long physical barrier being placed at mp 15.8 on the 1900 road. I do not support the decommissioning of any of the sections of the 1900 road, including: mp 15.8-16.7 or 16.7-17.4.

*I do not support the decommissioning of any of the sections of the 1961 road, including: 1961-869, 1961-876, 1961-877.

*I do not support the decommissioning of any of the unauthorized routes, and would instead encourage the Forest service to establish the following routes into the road system: UA 214, UA 353, UA 354, UA 355, UA 356, UA 249. These very short routes provide excellent opportunity for seclusion in the National Forest.

In interests of the watershed, I would support an alternative where culvert replacement occurs so that fish can pass freely, but where roads are kept and maintained.

On a positive note, I support and am pleased to see that regardless of road maintenance level or decommissioning, that groomed snowmobile routes will continue to be permitted. Additionally, I support the addition of "Unauthorized Road UA 249" to being added as a ML2 road in the Forest Service system roads.

I appreciate the opportunity to comment on the Little Naches Upland Restoration project. Please keep me apprised of new information, additional comment periods, and decisions made. Please add me to the mailing list for any follow-up actions.

With regard,
Anna Baklund

