



January 11, 2019

Erin Uloth, District Ranger
 Mt. Baker Ranger District
 810 State Route 20
 Sedro-Woolley, WA 98284-1264

Sent electronically to: comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@fs.fed.us

RE: Comments on the Baker Lake Road to Trail Project Draft EA

Dear District Ranger Uloth:

Thank you for the opportunity to comment on the Baker Lake Road to Trail Conversion Draft EA letter. The ___ conservation, human-powered recreation, equestrian and wildlife organizations representing Washington residents come together to work on issues relating to recreation, access and conservation. This project makes a concerted effort to acknowledge the interests of those who recreate outdoors, restore fishery habitat and support the National Forest Roadless Area Conservation Rule.

I. Support for the Preferred Alternative

We support the preferred alternative which would provide the following benefits:

- Decommission 0.9 miles of Baker Lake Road between the current Baker Lake Trailhead and parking lot and Channel Creek and approximately 0.9 acres of the existing Baker Lake Trailhead parking lot in order to provide fisheries benefits by reconnecting the Baker River to 93 acres of floodplain habitat for ESA-listed Bull Trout and steelhead.
- Convert 1.1 miles of Baker Lake Road to trail between Shannon Creek East and Channel Creek meandering along a flat grade with views of Baker Lake for the entire length of the new trail section. Multiple points of lake access are available along this new section of trail for families and elderly (and potentially ADA accessibility) as well as dispersed camping and lake shore access.

- Construct up to 1.2 miles of the #610 (Baker Lake Trail) between Channel Creek and Baker River that will be located along the valley wall above the Channel Migration Zone (CMZ) of the Baker River providing long-term sustainable recreational access.
- Construct a new parking lot near Shannon Creek on approximately 2.5 acres to serve as a new trailhead and provide sustainable recreation infrastructure for hikers, equestrians and other visitors.

The preferred alternative is the only option that restores natural river processes, reconnects floodplain habitat and maintains and enhances Late Successional Reserve habitat while maintaining long term access to high value recreation sites. We appreciate that this project is aiming to balance the goals of enhancing and restoring fisheries habitat in the channel migration zone of the Baker River while also retaining recreational and Tribal access to the north Baker Lake area in a long-term sustainable manner. The existing road has been and will continue to be vulnerable to costly washouts and damage associated with its placement within the channel migration zone of the Baker River.

I. Support for Avoidance of Any Violation of the 2001 Roadless Rule

We appreciate the attention by the District Ranger and staff around the issue of potential construction of a new road through the Mt. Baker South Inventoried Roadless Area as part of this project. The EA identified the discussion and response to this issue:

“One issue was identified and resolved during development of the proposal. In October 2017, a field visit to the project area was made with Washington Wild, The Wilderness Society, and American Whitewater to discuss the possible relocation of Baker Lake Road. At the time, the FS was looking to implement the Baker Lake and South Fork Nooksack ATM decision that included relocating the last 0.5 miles of Baker Lake Road to a new location after the road was damaged by Baker River flooding. The primary issue discussed at this meeting was the development of a road in an Inventory Roadless Area and whether it would violate the 2001 Inventory Roadless Rule. That discussion eventually led to the early development of the preferred alternative of converting the road to trail and relocating to an area outside the channel migration zone of the Baker River. Based on these public comments and discussion with the FS interdisciplinary team regarding the Inventory Roadless Rule, the Responsible Official decided not to pursue relocating the Baker Lake Road, but propose to convert it to trail to maintain access to the #610 and #606 trails.” (EA, Pg. 10)

II. Support for Important Fisheries and Habitat Benefits

We also appreciate the significant benefits to fisheries habitat and resources that will be realized by moving the last remaining infrastructure (i.e., the end of the Baker Lake Road) out of the channel migration zone of the Baker River. Removal of road fill will expand and reconnect open water wetland habitat beneficial to all juvenile salmon for overwinter rearing. As the EA points out (Pg. 18):

“The preferred alternative would decommission 0.9 miles of Baker Lake Road reconnecting Baker River to 93 acres of floodplain habitat. There are several historic floodplain channels and large open water wetland complexes that, if reconnected, would provide excellent juvenile rearing habitat for salmon and possibly some spawning habitat.”

Removal of parking lot armoring and fill will promote reconnection of historic overflow channels, providing additional rearing habitat while augmenting summer low flows in Channel Creek. Channel Creek is the highest producing stream of natural origin sockeye in the Baker Lake basin. The restoration of the channel migration zone is of great interest to local Tribes (including the Upper Skagit, Swinomish and Sauk-Suiattle) who rely on

healthy fish populations in order to exercise their treaty rights as well as fishing and conservation groups, both locally and statewide.

The Road to Trail Conversion between Shannon and Channel Creek would also provide fishery benefits as discussed in Pg. 18-19 in the EA:

“Converting 1.1 miles of Baker Lake Road to trail would return stream crossings to a more natural condition, allow additional area for riparian vegetation to grow along Baker Lake, and greatly reduce road-related sediment produced from recreational vehicle use. These actions would indirectly affect all fish species by reducing sediment into nearby streams draining to Baker Lake and improving riparian condition that contributes shade and terrestrial food sources to fish.”

III. Support for the Use of Road-to-Trail Conversion

We also appreciate the inclusion of the road-to-trail conversion within this project. This is an important tool to enhance recreational access while mitigating future annual maintenance costs of legacy roads. We applaud the Mt. Baker Ranger District for making use of this option both as part of the Upper Nooksack Access Travel Management plan (end of the North Fork Nooksack Road) as well as with this project. This conversion will likely assist in reducing dispersed camping around the area and result in a reduction of detrimental instances of user impact while still providing access to places people use and enjoy.

IV. Understanding of Costs for this Project

We understand that the proposed action may result in higher trail construction costs than Alternative 1. However, the maintenance costs incurred with Alternative 1 (being placed so closely to the floodplain) may ultimately result in greater cost over time along with limited access due to washouts. We understand that the Forest Service engineers have concluded that they are able to use an excavator (trail building machine) for the new trail construction which should provide some cost efficiencies for the project. We understand that the Forest has secured funds for several elements of this project already.

V. Support for Long-Term Sustainable Recreation Opportunities and Infrastructure

The preferred alternative will provide additional recreational benefits for a variety of users including hikers, trail runners, equestrians and families. The longer trail connection allows for a heightened user experience. The proposed trail offers sections of old-growth and changes in elevation, while still connecting to the original trail further up the river via an existing bridge crossing. The trail would connect with the Baker River Trail (which provides access into North Cascades National Park) and the East Bank Baker Lake Trail (which is the only year-round trail open to stock on the Mt. Baker Ranger District).

The proposed trail follows the slope of the mountain and northwest edge of the floodplain itself and would be more sustainable than Alternative 1. It's avoidance of the floodplain would allow for natural movement of the Baker River within the floodplain in the short and long-term. This trail would be more sustainable over a 20-year period than the other alternative considered. Its diversion from the floodplain itself also indicates a reduction in the likelihood of user impact to the river and associated riparian landscape.

VI. Specific Recreational Priorities Need to be affirmed in the Final Environmental Assessment

Many of our organizations submitted scoping comments that specifically identified recreational elements that were important to affirm and identify in the Draft EA. It is our understanding based on personal

communications with the ID team for this project that the following elements are intended to be included in the project but are not articulated in the draft EA:

- The new trail through the roadless area will be constructed to equestrian standards providing an extended riding opportunity for equestrians. This trail is also intended to be open to hiking and trail running but not to mountain bikes.
- The proposed new parking area near Shannon Creek should include as many as 12 separate parking spaces to accommodate horse trailers. This is an important amenity that is much sought after.
- The proposed new parking area near Shannon Creek should include a minimal investment of a simple high line set up to allow for equestrian overnight camping (as was available at the previous trailhead).
- A section of the proposed 1.1-mile road-to-trail conversion along the lake shore should include an ADA-accessible stretch leaving from the new proposed parking lot and trailhead at Shannon Creek. This inclusion would allow for users to experience the sights around the lake in an accessible manner without significantly increasing their distance-traveled. There could also be an opportunity to invest in some interpretive signage along such a trail that could address the ecology, geology and Tribal history of the Baker River and Baker Lake area.

Lastly, we understand that the fisheries benefits from restoring the channel migration zone of the Baker River are of great interest to local Tribes. We expect that the Forest will have a separate government to government consultation with these Tribes pursuant to their status as sovereign nations.

Thank you for the opportunity to provide comments to the Draft EA for this important project.

Sincerely,

Tom Uniack
Executive Director
Washington Wild
tom@wawild.org

Andrea Imler
Advocacy Director
Washington Trails Association
aimler@wta.org

Megan Birzell
Washington State Director
The Wilderness Society
megan_birzell@twss.org

Marlies Wierenga
Pacific Northwest Conservation Manager
WildEarth Guardians
mwierenga@wildearthguardians.org

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers
katherineh@mountaineers.org

Hilary Eisen
Recreation Planning and Policy Manager
Winter Wildlands Alliance
heisen@winterwildlands.org

Robert Kaye
Conservation Committee Chair
North Cascades Audubon Society
rkaye@northcascadesaudubon.org

Larry Lober
President
Greater Bellingham Trail Running Club
loberlober@frontier.com

Peter Bahls
Executive Director
Northwest Watershed Institute
peter@nwwatershed.org

Joseph Bogaard
Executive Director
Save Our Wild Salmon Coalition
joseph@wildsalmon.org

Brad Throssell
State Chair
Washington Council of Trout Unlimited
wacounciltu@gmail.com

Rich Simms
Founder and Board Member
Wild Steelhead Coalition
info@wildsteelheadcoalition.org

Jen Watkins
Conservation Associate
Conservation Northwest
jwatkins@conservationnw.org

Jeff Kish
Executive Director
Pacific Northwest Trail Association
jeffkish@pnt.org

Wendy McDermott
Director, Rivers of Puget Sound & Columbia Basin
American Rivers
wmcdermott@americanrivers.org

Harry Romberg
Co-Chair, National Forest Committee
Washington Chapter of the Sierra Club
hbromb@aol.com

Mike McGlenn
Trail Head Chairman
Back Country Horsemen of Whatcom County
mikekmcglenn@gmail.com

Cathy Nelson
Director, Trailduster Chapter
Back Country Horsemen of Washington
tripplenfarm@gmail.com

Jeff Kish
Executive Director
Pacific Northwest Trail Association
jeffkish@pnt.org

Thomas O'Keefe
Pacific Northwest Stewardship Director
American Whitewater
okeefe@americanwhitewater.org

Tom Hammond
President
North Cascades Conservation Council
tphammond@gmail.com

Mark Sherwood
Executive Director
Native Fish Society
mark@nativefishsociety.org

John McGlenn
President
Washington Wildlife Federation
johnmcglenn@gmail.com

Anna Wille
Co-Founder
Women for Wildlands
annalise.wille@gmail.com

Rob Smith
Northwest Regional Director
National Parks Conservation Association
rsmith@npca.org

CC: Forest Supervisor Jamie Kingsbury
Congresswoman Suzan DelBene
Senator Patty Murray
Senator Maria Cantwell