



October 26, 2018

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](mailto:comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@fs.fed.us)

**RE: Scoping Comments on the Baker Lake Road to Trail Project**

Dear District Ranger Uloth:

Thank you for the opportunity to comment on the Baker Lake Road to Trail conversion project scoping letter. The 24 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 to evaluate alternative trail locations is a commendable effort to acknowledge the interests of those who recreate outdoors, restore fishery habitats and support the National Forest Roadless Area Conservation Rule.

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.

A number of our organizations attended a field tour with Mt. Baker Ranger District staff a few months ago to discuss challenges and solutions to address the problem of frequent flooding and washouts impacting access to a trail via the Baker Lake road. One option discussed was the construction of a new road through the Mt. Baker South Inventoried Roadless Area which would have violated the 2001 National Forest Roadless Area Conservation Rule. We are happy to see that the two alternatives being considered as part of this project do not include building a road in a roadless area.

We also appreciate the significant benefits to fisheries habitat and resources that will be realized by moving the last remaining infrastructure (i.e., the road segment) 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. 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 who rely on healthy fish populations in order to exercise their treaty rights as well as fishing and conservation groups, both locally and statewide.

### **Recommendations**

We appreciate the careful consideration built into providing the two trail alternatives. Both options provide thoughtful approaches which do not result in a violation of the Roadless Rule. Given the proposed alternatives, our organizations support moving forward with the proposed action for this project. The proposed action allows for long-term sustainable use for trail users, a heightened user experience and reduction of user impact to the Baker River and the associated floodplain.

The proposed action, which follows the slope of the mountain and northwest edge of the floodplain itself 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. Furthermore, the proposed action allows for a heightened user experience. The proposed action 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 the Mt. Baker Ranger District).

We understand that the proposed action may result in higher trail construction costs than Alternative 1. However, the possible maintenance costs incurred with Alternative 1 being placed so closely to the floodplain may ultimately result in increased cost. The proposed action provides a long-term, sustainable option with an authentic user experience that avoids possible detrimental user impact to Baker River.

We also appreciate the inclusion of the road-to-trail conversion within this project. We feel 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.

The proposed action will provide additional recreational benefits for a variety of users. The longer trail connection to the Baker River Trail and the East Bank Baker Lake Trail will provide access to both the North Cascades National Park and the over 14 mile East Bank Baker Lake Trail for trail runners, equestrians and other users.. The new trail through the roadless area will be constructed to equestrian standards providing an extended riding opportunity for equestrians. Equally important, is the

opportunity, with this project, to include as many as 12 separated parking spaces to accommodate horse trailers at the proposed new parking area near Shannon Creek. We support the minimal investment of a simple high line set up to allow for equestrian overnight camping (as was available at the previous trailhead) adjacent to the proposed new parking area.

However, this road-to-trail conversion will result in a reduction of access for trail users looking for shorter experiences. As this conversion would be conducted on a prior road, the user experience for this section of the trail will also not be a traditional outdoor encounter. Given this, we recommend considering the inclusion of ADA-accessible areas or short trails around the new proposed parking lot and trailhead at Shannon Creek, or along the road-to-trail conversion. 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 during the scoping stage of this project. We look forward to reviewing the environmental assessment in 2019.

Sincerely,

Andrea Imler  
Advocacy Director  
Washington Trails Association  
[aimler@wta.org](mailto:aimler@wta.org)

Rich Simms  
Founder and Board Member  
Wild Steelhead Coalition  
[info@wildsteelheadcoalition.org](mailto:info@wildsteelheadcoalition.org)

Tom Uniack  
Executive Director  
Washington Wild  
[tom@wawild.org](mailto:tom@wawild.org)

Larry Lober  
President  
Greater Bellingham Trail Running Club  
[loberlober@frontier.com](mailto:loberlober@frontier.com)

Marlies Wierenga  
Pacific Northwest Conservation Manager  
WildEarth Guardians  
[mwierenga@wildearthguardians.org](mailto:mwierenga@wildearthguardians.org)

Peter Bahls  
Executive Director  
Northwest Watershed Institute  
[peter@nwwatershed.org](mailto:peter@nwwatershed.org)

Greg Shimek  
President  
Puget Sound Flyfishers  
[gregs47@icloud.com](mailto:gregs47@icloud.com)

Andrea Matzke  
President  
Wild Washington Rivers  
[andrea@wildwarivers.org](mailto:andrea@wildwarivers.org)

Greg Haller  
Executive Director  
Pacific Rivers  
[greg@pacificrivers.org](mailto:greg@pacificrivers.org)

Brad Throssell  
State Chair  
Washington Council of Trout Unlimited  
[Brad.Throssell@dell.com](mailto:Brad.Throssell@dell.com)

Robert Kaye  
Conservation Committee Chair  
North Cascades Audubon Society  
[rkaye@northcascadesaudubon.org](mailto:rkaye@northcascadesaudubon.org)

Kitty Craig  
Acting State Director  
The Wilderness Society  
[kitty\\_craig@twc.org](mailto:kitty_craig@twc.org)

Harry Romberg  
Co-Chair, National Forest Committee  
Washington Chapter of the Sierra Club  
[hbromb@aol.com](mailto:hbromb@aol.com)

Timothy Manns  
Conservation Chair  
Skagit Audubon Society  
[bctm@fidalgo.net](mailto:bctm@fidalgo.net)

Annie Cubberly  
Broad Band Leader, Polly Dyer Cascadia Chapter  
Great Old Broads for Wilderness  
[anniecubberly@gmail.com](mailto:anniecubberly@gmail.com)

Katherine Hollis  
Conservation and Advocacy Director  
The Mountaineers  
[katherineh@mountaineers.org](mailto:katherineh@mountaineers.org)

J Michelle Swope  
Washington Regional Coordinator  
Native Fish Society  
[jmichelle@nativefishsociety.org](mailto:jmichelle@nativefishsociety.org)

Cathy Nelson  
Director, Trailduster Chapter  
Back Country Horsemen of Washington  
[tripplenfarm@gmail.com](mailto:tripplenfarm@gmail.com)

Mike McGlenn  
Trail Head Chairman  
Back Country Horsemen of Whatcom County  
[mikekmcglenn@gmail.com](mailto:mikekmcglenn@gmail.com)

Gus Bekker  
President  
El Sendero Backcountry Ski & Snowshoe Club  
[gwbekker@charter.net](mailto:gwbekker@charter.net)

Margaret Bushnell  
Vice President  
Mount Baker Club  
[bushnell.margaret@gmail.com](mailto:bushnell.margaret@gmail.com)

John McGlenn  
President  
Washington Wildlife Federation  
[johnmcglenn@gmail.com](mailto:johnmcglenn@gmail.com)

Wendy McDermott  
Director, Puget Sound-Columbia Basin Programs  
American Rivers  
[wmcdermott@americanrivers.org](mailto:wmcdermott@americanrivers.org)

Anna Wille  
President, Bellingham Chapter  
Women for Wildlands  
[annalise.wille@gmail.com](mailto:annalise.wille@gmail.com)

Thomas O'Keefe  
Pacific Northwest Stewardship Director  
American Whitewater  
[okeefe@americanwhitewater.org](mailto:okeefe@americanwhitewater.org)

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