



November 1, 2017

Erin Oloth, District Ranger  
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Submitted electronically to: [comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@fs.fed.us](mailto:comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@fs.fed.us)

**RE: Mt. Baker Ranger District Road Repairs**

Dear District Ranger Oloth,

Thank you for the opportunity to provide comments on the scoping notice for several road repairs on the Mt. Baker Ranger District.

The undersigned conservation and recreation organizations support a common ground approach to the national forest road system. We believe that you can both prioritize the repair and maintenance of forest service roads that provide access to recreational infrastructure like trails, campgrounds or parking areas while also properly decommissioning old decaying logging roads that pose high aquatic risks to the watershed and have not provided important access.

The Mt. Baker-Snoqualmie National Forest has taken a leadership role responding to an agency-wide requirement for all national forests to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns when the Forest developed a Sustainable Road Strategy (SRS). The Forest took the additional step of providing opportunities for extensive public input into the sustainable roads strategy and then investing in two NEPA-based watershed based Access Travel Management (ATM) plans for the Nooksack and Greenwater watersheds, which made specific road decisions for implementing the SRS.

The recent Nooksack Access Travel Management Plan, completed in January of this year, was an important step forward in balancing recreation, tribal and community access, salmon and water quality protection and economic realities. Road decisions on national forests can be controversial. Yet the Mt.

Baker Ranger District staff successfully navigated numerous stakeholder concerns by carefully listening, seeking to understand, and ultimately making modifications to its decision.

### **Support for Mt. Baker Ranger District Road Repair Projects that fall within the Nooksack ATM Planning Area**

Many of the undersigned organizations commented on the draft Environmental Assessment for the Nooksack ATM plan. The following road segments identified within this project are consistent with the final decision of that plan and our previous comments. We support the repair and maintenance of these roads as part of this project.

Canyon Creek Road - NFS Road 31 – The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to Damfino Lakes Trailhead including access to Boundary Way and Canyon Ridge Trails for hiking, equestrian, mountain biking and paddling opportunities. The Forest’s SRS analysis also indicated this road as “high” risk for aquatics. We expect that the repairs and overdue maintenance on this road will help reduce both risks to aquatics and loss of access from future road-washouts.

Glacier Creek Road, NFS Road 39 - The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to Mt Baker Vista including Heliotrope Ridge Trail for hiking, scenic viewing, alpine and ice climbing, snowshoeing, cross country skiing and paddling opportunities. The Forest’s SRS analysis also indicated this road as “high” risk for aquatics. We expect that the repairs and overdue maintenance on this road will help reduce both risks to aquatics and loss of access from future road-washouts

East Church Road, NFS Road 3040 – The Forest’s SRS analysis identified this road as a “high” need for recreation providing access to Church Mountain Trailhead for hiking opportunities. The Forest’s SRS analysis also indicated this road as “high” risk for aquatics. We expect that the repairs and overdue maintenance on this road will help reduce both risks to aquatics and loss of access from future road-washouts

### **Support for Mt. Baker Ranger District Road Repair Projects outside of the Nooksack ATM Planning Area**

The following road repairs identified as part of the project were not covered in the recent Nooksack ATM. We support the repair and maintenance of these roads where needed to provide access.

Diobsud Creek Road, NFS Road 1050 – The Forest’s SRS analysis identified this road as a providing some need for recreation by providing access to Diobsud Creek Trail for hiking and fishing opportunities and residential access The Forest’s SRS analysis also indicated this road as “low” risk for aquatics.

Morovitz Creek & Martin Creek Roads, NFS Roads 1144 & 1130 – The Forest’s SRS analysis identified these roads as a medium and high need for recreation providing access to Hot Springs, Swift Creek Trails and Park Creek Campground for hiking and camping opportunities. The Forest’s SRS analysis also indicated this road as “low” risk for aquatics. We expect the repairs to be adequate to provide needed access.

Baker Lake Highway, NFS Road 11 – The Forest’s SRS analysis identified this road as a high need for recreation providing access to Baker River and East Bank Baker Lake Trails for hiking,

equestrian and camping opportunities. The Baker Lake Trail includes access to North Cascades National Park. The Forest's SRS analysis also indicated this road as "low" risk for aquatics. We expect the repairs be targeted to provide the ongoing access to these trails.

### **Road Repairs Should Be Resilient for Access and Alleviate Aquatic Risk Concerns**

We would like to stress that several of these roads are rated as high risk to aquatics. This is largely due to their location next to rivers that are important for salmon. Canyon Creek and Glacier Creek watersheds have "poor" road/trails ratings in the USFS Watershed Condition Framework. These areas also provide a wealth of outdoor recreation opportunities. This project provides an opportunity to complete repairs and maintenance in a manner that protects salmon and recreational access. It is our understanding that Federal Highways, which provides funding for this type of work, generally only replaces "as is." We encourage the agency to view this as an opportunity to repair the road to the same maintenance level work with FHA to install larger culverts, create adequate road drainage, diffuse water across the landscape and install appropriate features to "stormproof" these roads and ensure that impacts to rivers and salmon are minimized.

### **Road Repair Projects Should Not Impact Inventoried Roadless Area, Old Growth Forest or Existing Wilderness Boundaries**

Based on the scoping notice and information provided, it is our understanding that none of these important road repairs will impact inventoried roadless area boundaries, old-growth forests or existing Wilderness boundaries. These are all important values that are underrepresented on the landscape and are afforded administrative or legislative protections.

Thank you for the opportunity to comment on this important project.

Sincerely,

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