



April 15, 2014

Theresa Mathis  
Environmental Coordinator  
Mt. Baker Snoqualmie National Forest  
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Dear Ms. Mathis:

We are writing in response to the March 10, 2014 notice regarding several access improvement projects within the Mt. Baker district of the Mt. Baker-Snoqualmie National Forest.

Our organizations work to protect wild lands and waters in Washington State while also preserving and enhancing recreational access so that people can enjoy the places we work so hard to protect. Our members participate in a variety of outdoor recreation activities, and we support access improvements for non-motorized backcountry uses across the Forest. The Mt. Baker-Snoqualmie National Forest provides world-class recreational opportunities which in turn benefit local economic activity and support the unique quality of life that families and residents enjoy here in Washington State.

We wish to provide comments on two of the projects which were part of the March 10, 2014 notice:

### **Mt. Baker Ski Area Parking Expansion**

Our understanding is that the proposed expansion of the Mt. Baker Ski Area parking lot is focused on accommodating an increase in winter backcountry use. Large groups, such as boy scouts and church groups who park to cross country ski, backcountry ski, snowshoe, sled or pursue other non-motorized recreational opportunities have created an increased demand for more parking spaces, particularly on high traffic days in the winter. At issue is that overflow parking has spilled onto Highway 542 itself.

Expanding parking at this location would address additional concerns. For example, the Washington Department of Transportation maintenance crews are currently unable to effectively plow Highway 542 when cars are parked on the shoulder. The Forest Service has expressed potential safety concerns related to families with young children forced to park and walk on Highway 542 to their destinations. The Mt. Baker Ski Area has also expressed concern that their patrons may be displaced by the backcountry recreationists on high traffic days.

Our organizations support the quality recreational opportunities provided by the Forest in this area for residents, families and visitors alike. Providing adequate infrastructure for the increased demand for these activities is a laudable goal.

We recognize that there are considerable issues related to expanding the parking lot, including high elevation and the limited growing season for local fauna. We were happy to learn that the agency and the

ski area have done a considerable amount of investigation about how to avoid impacts to the aquatic environment and fauna. We support the decision to expand the upper parking lot by removing a rock face to mitigate paving over fragile meadows. We also support the contention that any large trees in the area will be retained for aesthetic and ecological value.

We appreciate that the installation of a toilet will be included in the expanded parking area, which has been a source of concern by visitors over the past few years, and will help minimize recreationists' impact.

Lastly, we support the use of fill materials from the rock face to expand the "white salmon" parking lot. This will meet additional demand from winter non-motorized users (snowshoers and cross-country skiers).

We understand that a categorical exclusion is an option under the National Environmental Policy Act (NEPA) and we feel it should be used appropriately. We encourage the agency to make sure that a categorical exclusion is an appropriate level of NEPA for this project.

### **Hannegan Road Winter Closure**

This project seems to officially recognize a number of actions that are already being put into practice in the interest of offering non-motorized winter recreation opportunities and mitigating safety concerns around pedestrian traffic on Highway 542.

Our understanding is that during winter the Hannegan road is officially open. However, the road receives significant snow and is not plowed for vehicle traffic. The Nooksack Nordic Ski Club grooms the road for cross-country ski travel and non-motorized recreational access at their expense. A snow berm is created at the head of the road to discourage vehicles driving on the unplowed road.

We support the seasonal closure of the Hannegan road to the extent it will facilitate and formalize measures that are already being taken to increase safety and foster non-motorized winter recreational opportunities. For example, a seasonal closure would:

- Eliminate the incentive for passenger vehicles to try to drive on the road segment which is not maintained for that use.
- Reduce time and expense by Forest Service or Washington Department of Transportation personnel responding to vehicles getting stuck on the inadequately maintained road.
- Allow the Hannegan road to be included in the Washington State Sno-Park system to provide for non-motorized winter recreational opportunities. Such a designation is consistent with the current use of this road in the winter and would allow grooming the road to be eligible for additional funding.
- Eliminate an existing incentive for visitors to park at the Hannegan parking area under a \$5 Northwest Forest pass and walk on Highway 542 to the Salmon Ridge Sno-Park area (which requires a separate seasonal pass). This is a significant safety concern that has been referenced by the Forest Service during winter as pedestrians are forced on the road prism in winter. If the Hannegan road were to be included in the Washington State Sno-Park system the Hannegan parking area would be subject to the Sno-Park seasonal pass and eliminate the incentive to park and walk on Highway 542. This seasonal pass provides funding used to groom trails which are part of the Sno-Park system each winter.

While we have heard of some isolated instances of visitors driving up the Hannegan road to gain access to backcountry skiing opportunities, the groomed winter road is overwhelmingly used for dog walking, cross-country skiing, snowshoeing and other activities. These uses, in addition to the safety concerns listed above, would seem to outweigh the very limited backcountry skier use. We would also like to see this area continue to be dog-friendly.

To be clear, we agree that a seasonal winter closure of the Hannegan road is warranted and in large part formalizes management that is already in practice. However, these comments in no way support closing the Hannegan Road during the summer and shoulder seasons, where it affords important recreational access for hikers, climbers, equestrians and other user groups.

Thank you for the opportunity to give input on these access improvement projects. We appreciate the opportunity for common ground around a sustainable road system, and to that end, our organizations have been participants in the Forest's Sustainable Roads Cadre, focused on providing meaningful public input to the required analysis of the current forest road system. We support putting the Forest's scarce financial resources into recreational improvements and road repairs on the roads that provide important public access.

Please include our organizations on your email list for future projects as they are released for public input.

Sincerely,

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