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September 17, 2015

Erin Uloth, District Ranger
Mt. Baker Ranger District
810 State Route 20
Sedro-Woolley, WA 98284-1263

RE: 2015 Upper North Fork Nooksack Access Travel Management Project

Dear District Ranger Uloth,

Thank you for the opportunity to provide comments on the scoping notice for the “Access Travel Management (ATM) Project” in the Upper North Fork Nooksack region. As non-profit organizations focused on conservation and recreation with members who live, work and play in the region, we have a strong interest in current and future management activities on the Mt. Baker – Snoqualmie (MBS) National Forest.

We are aware of the many challenges the U.S. Forest Service faces with its oversized and under-maintained road system and have worked to help address some of the funding challenges. The agency’s road system was built decades ago – historically financed nearly 75 percent by federal appropriations - to support large-scale timber harvesting. Today, the road network continues to support forest management activities in addition to a strong recreation economy, with at least 63 percent of Washingtonians participating in outdoor activities each year generating \$1.6 billion in local and state taxes¹.

Unfortunately, road budgets do not support this increase in demand as funding levels have dropped to 18 percent of what they were in 1990. We understand that the Forest Service is overwhelmed by significant management and ecological problems related to this deteriorating infrastructure. We recognize and support the need to make decisions to adapt to modern-day recreational interests, tribal and cultural needs, while also reducing aquatic and terrestrial impacts and lining up with realistic budgets. We appreciate your effort in working toward this balance.

Furthermore, we also feel strongly that despite the existence of nearly \$3 billion road maintenance backlog on the more than 370,000 miles of Forest Service system roads nationwide, there is significant common ground around maintenance priorities and restoration opportunities. Most Forest Service roads fall into two general categories: (1) roads that provide access to recreational opportunities (e.g., trailheads, campgrounds, river access, other infrastructure, etc.) and other important National Forest lands for preserving management, cultural, and/or social access; and (2) already closed old, decaying and poorly maintained logging roads that have significant aquatic risk factors posing threats to watershed and fisheries health (e.g., clogged culverts, sedimentation, etc.) while not providing significant recreational or other access. Fortunately, these two general road categories are largely mutually exclusive. For example, most of these decaying logging roads, due to their lack of maintenance over the years do not provide significant

¹ Outdoor Industry Association. The Outdoor Recreation Economy FactSheet. 2012.

recreational or access opportunities, and are relatively non-controversial to close or decommission. A third much smaller category includes a handful of roads on different forests that do provide potential access but at an engineering, ecological or financial cost that makes for a robust public debate (e.g., Stehekin, Dosewallips, etc.). Unfortunately, despite being a minute percentage of the overall road system, these difficult decisions receive the most attention and often color the public narrative on Forest Service roads.

To that end, for nearly a decade a coalition of conservation, recreation, wildlife groups have joined with the Washington Department of Ecology through the Washington Watershed Restoration Initiative to support more than \$300 million of federal funding to address the legacy road problem. We encourage the Forest to use the Sustainable Roads Strategy (SRS) and Access and Travel Management (ATM) process to embrace the significant common ground around legacy roads and to preserve and enhance recreational access during this process, while also achieving the goals of a sustainable road system.

Background on the Travel Management Rule

As described in your announcement, the purpose of this project is to “align the size of the Forest Service road system with projected road maintenance budgets.” Further, the MBS will “balance access needs with resource protection and existing budgets.” This stems from the Travel Management Rule (referred to as “Subpart A”) in 2001.² The rule directs each National Forest to conduct “a science-based roads analysis,” generally referred to as the “travel analysis process” or, as the MBS has described, a “Sustainable Roads Strategy (SRS).”³ Forest Service Manual 7712 and Forest Service Handbook 7709.55, Chapter 20 provide detailed guidance on conducting travel analysis. Based on that analysis, forests must first “identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.”⁴ The Rule further defines the minimum road system as:

...the road system determined to be needed [1] to meet resource and other management objectives adopted in the relevant land and resource management plan . . . , [2] to meet applicable statutory and regulatory requirements, [3] to reflect long-term funding expectations, [and 4] to ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

Forests must then “identify the roads . . . that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails.”⁵

While Subpart A does not impose a timeline for agency compliance with these mandates, the Forest Service Washington D.C. Office, through a series of directive memoranda, ordered forests to complete their Travel Analysis Process (called the SRS on the MBS) by the end of fiscal year 2015, or lose maintenance funding for any road not analyzed. The memoranda articulate an expectation that forests, through the Subpart A process, “maintain an appropriately sized and environmentally sustainable road system that is responsive

² 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A

³ 36 C.F.R. § 212.5(b)(1)

⁴ 36 C.F.R. § 212.5(b)(1)

⁵ 36 C.F.R. § 212.5(b)(2). The requirements of subpart A are separate and distinct from those of the 2005 Travel Management Rule, codified at subpart B of 36 C.F.R. part 212, which address off-highway vehicle use and corresponding resource damage pursuant to Executive Orders 11,644, 37 Fed. Reg. 2877 (Feb. 9, 1972), and 11,989, 42 Fed. Reg. 26,959 (May 25, 1977).

to ecological, economic, and social concerns.”⁶ Although the scoping notice implies that the results of their SRS analysis are incorporated into the proposed ATM, since the MBS has not yet released their SRS, we are unable to evaluate the extent to which the analysis has been used in the ATM process to date.

After reading through the scoping notice, we ask you to consider the following actions when drafting the Environmental Assessment, including:

I. Allow the public to evaluate and understand the results of the SRS analysis to inform input on this proposal

Our understanding is that the long-awaited sustainable roads analysis is expected to be released to the public at the end of September. Unfortunately, the current scoping comment period ends before that release. As you know, a significant public engagement effort was launched by the MBS and many of our groups participated in that effort. The scoping notice says that the SRS recommendations are used as a starting point, but all of the analysis should also be used.

In addition to the SRS identifying opportunities for changing the forest transportation system, the foundation of the plan is the analysis of road benefits and risks, which then are to be used to inform the site-based decisions in this project. We expect forest-wide specialists should analyze risks – specifically aquatic and terrestrial risks – and address them in the NEPA analysis for this project. Information from the aquatics risks analysis is particularly important, given the recognition of the Nooksack as a Tier 1 Key Watershed in the Northwest Forest Plan and its importance for salmon recovery, other wildlife, and a source of clean water.

It will be very important that the MBS recognize and be prepared for substantive feedback relating to the inclusion of the SRS analysis in the ATM during the draft plan comment period since that opportunity will not be available in scoping.

II. Re-evaluate what constitutes a “minimum road system”

As forest road users and conservationists, we do understand that a strategic reduction in road miles does not necessarily equate to a loss of access. There are some roads that are already functionally closed, either due to washouts, lack of use, or natural vegetation growth. There are other roads that receive limited use and are costly to maintain. It is our belief that resources can be better spent on roads providing significant access than to spread resources thinly to all roads. This is why we support the careful analysis and decision to decommission or close specific roads.

According to Table 2 in the Public Scoping Letter, the proposed “minimum road system” is 2.7 percent smaller than the current road system (5.2 miles decommissioned). We support the Forest Service’s efforts to move forward with implementing the Sustainable Roads Strategy, but it is difficult to understand how sustainability is achieved when the changes are minimal.

While the roads proposed for decommissioning are not listed in the scoping letter, we identified the roads indicated with an Objective Maintenance Level as Decommission using the maps provided. We found that

⁶ Memorandum from Joel Holtrop to Regional Foresters *et al.* re Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Nov. 10, 2010); Memorandum from Leslie Weldon to Regional Foresters *et al.* re Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Mar. 29, 2012); Memorandum from Leslie Weldon to Regional Foresters *et al.* re Travel Management Implementation (Dec. 17, 2013).

of the 11 road segments (totaling 5.2 miles) identified in the maps as to be decommissioned, 9 of them (totaling 3.05 miles) had already been listed on the agency’s INFRA database⁷ with an objective maintenance level of Decommission. This suggests that based on the recent SRS analysis for the North Fork Nooksack area only 2.15 miles have been identified to be decommissioned.

| Mt. Baker Snoqualmie INFR Aroad Database (2012) | | | | | | | |
|-------------------------------------------------|----------------|----------|-----|------|-------------|-----------------------------------|-----------------------|
| ID | NAME | BEGIN_TE | BMP | EMP | SEG_LENGTH | OPER_MAINT_LEVEL | OBJECTIVE_MAINT_LEVEL |
| 3000058 | NONAME | SH 542 | 0 | 0.1 | 0.1 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3019000 | CONDOMINIUM | SH 542 | 0 | 0.3 | 0.3 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3040000 | EAST CHURCH | HWY 542 | 2.4 | 2.7 | 0.3 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3040011 | POWERLINE | RD 3040 | 0 | 0.3 | 0.3 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3040111 | | RD 30401 | 0 | 0.15 | 0.15 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3100018 | LORETTA | ROAD 31 | 0 | 0.4 | 0.4 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3700030 | TAIL HOLD | RD 37 | 0 | 0.7 | 0.7 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3910030 | COMPTON SPUR | RD 3910 | 0 | 0.3 | 0.3 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| 3912000 | THOMPSON RIDGE | RD 3910 | 0 | 0.5 | 0.5 | 1 - BASIC CUSTODIAL CARE (CLOSED) | D - DECOMMISSION |
| TOTALS: | | | | | 3.05 | | |

Consider that the agency’s own INFRA database predating the most recent sustainable roads analysis identified approximately 78 miles of legacy roads with an objective maintenance level of Decommission. This begs the question of why the recent analysis has resulted in an ATM process that identified fewer roads to be decommissioned than the previous planning information. We would have expected that the 78 miles would be closer to a minimum mileage considered for decommissioning.

As you move forward with the NEPA analysis, we ask that you take a second look to determine if there are any other candidate roads that could be considered for decommissioning or closing – in particular, roads rated “high risk” for aquatic and terrestrial resources and low benefit for recreation and access (see description below).

III. Provide detailed description of how “high-risk” roads will be addressed.

The SRS should have determined, across the forest, which roads are “high risk” for aquatic and terrestrial resources. If these “high-risk” roads have “low benefit” (e.g., access need), then they should be decommissioned. If these “high-risk” roads have “high benefit,” then they should be prioritized for strong maintenance, storm-proofing, best-management practice installations, and/or mitigation. Measures need to be taken that ensure the risks to aquatics is eliminated or significantly reduced. “Medium risk” roads should not be overlooked, either. For years, the Forest Service has failed to meet its obligations under the Clean Water Act and Washington’s Forest and Fish Regulations for addressing water quality impacts from roads.⁸ Now that the SRS analysis is complete, we expect to see actions to address the problem areas identified.

In the Draft Environmental Assessment (EA), we recommend that the Agency take a second look at risk analysis from the SRS to determine if there are additional high/medium-risk roads with low/medium benefit that should be considered for closure or decommissioning. In addition, the specific measures that will be used to eliminate and/or reduce the “high risks” should be clearly outlined.

⁷ The INFRA database version we used was dated 2012.

⁸ The USFS signed a Memorandum of Agreement with the Washington State Department of Ecology to meet responsibilities under the Federal and State Water Quality Laws in 2000. By 2005, all Forest Service roads in Washington State should have had completed (1) road management plans based on road analysis or road assessments to determine water quality effects and (2) an implementation schedule to address those issues.

IV. Identify priority recreational access routes to be retained

Several roads in the North Fork Nooksack area provide important access opportunities for recreational use. These important roads should be scored highly as to their benefits in the sustainable roads analysis and given significant consideration for retention and maintenance. Many of these road segments have been identified as providing important recreational access in the recently completed Upper Nooksack River Recreation Plan (March 2015)⁹. Because we have not yet seen the sustainable roads analysis, we have listed the key access roads below including their recreational importance.

- Highway 542 (FS3000) to road end including Horseshoe Bend, Excelsior Pass, Chain Lakes, Bagley Lakes, Wild Goose, Picture Lake, Panorama Dome, Lake Ann, Artists Ridge, Table Mountain, Ptarmigan Ridge, Heather Meadows and Fire and Ice Trails, Douglas Fir, Excelsior and Silver Fir campgrounds and Mt Baker Ski Area and Artist Point – hiking, downhill skiing, camping, scenic viewing, paddling
- FS 3060 to Welcome Pass Trailhead including High Divide Trail – hiking
- FS 3040 to Church Mountain Trailhead -- hiking
- FS 3065 to Winchester Mountain, High Pass and Silesia Creek trailhead including Tomyhoi Lake and Yellow Aster Butte Trails -- hiking
- FS 3070 to road end and 020 spur – nordic skiing
- FS 3071 to the switchback above the second crossing of Anderson Creek (approximately the 4 mile mark) - nordic skiing
- FS 3075 to road end including 011 and 012 spurs - nordic skiing
- FS 31 to road end including Damfino Lakes, Boundary Way and Canyon Ridge Trails – hiking, mountain biking, paddling
- FS 32 to road end including Hannegan Pass and Goat Mountain Trails – hiking, alpine climbing, nordic skiing, horsepacking
- FS 33 to Nooksack Falls Trailhead – hiking
- FS 34 to the Nooksack Cirque Trailhead – hiking, alpine climbing
- FS 37 to road end including Skyline Divide and Boyd Creek Trails – hiking
- FS 39 to-road end including the Heliotrope Ridge Trail and Mt. Baker Vista - hiking, scenic viewing, alpine and ice climbing, paddling

V. Explain rationale for the decrease in total passenger car road mileage (ML 3-5 roads)

According to Table 2, 9.6 miles of “passenger car” roads appear to be moved to “high clearance” vehicle maintenance schedules. Although this helps with budgetary challenges, it is disconcerting to recreationists and community members who do not have access to a high-clearance vehicle. It becomes an equity issue when only those who can afford more expensive 4WD vehicles can reach trailheads. We wonder if there is something we are missing and maybe these changes are appropriate. Is there a resulting net benefit for recreationists? Will this change ensure that the roads key for access to recreational sites and trailheads receive adequate maintenance? Currently, we interpret this as a loss but further explanation from the Agency could highlight how this may be a benefit.

In the Draft EA, we recommend that the Agency outline which specific roads will be downgraded to ML2, what the reasoning is, and how remaining ML3-5 roads will benefit from the cost savings achieved.

⁹ <http://www.americanrivers.org/initiative/wild-and-scenic/projects/nooksack-river-recreation-planning/>

VI. Re-assess whether the actions result in the budgetary alignment required

The scoping notice identifies the project need as to: "...align the size of the Forest Service road system with projected road maintenance budgets." Information from Table 2 of the Public Scoping Letter was analyzed and it appears that the proposed changes will result in a net savings of approximately \$40,000 per year – a 15 percent change (see Table A, below).

From 2010-2015, the MBS Capital Improvements and Maintenance budget for roads (CMRD) alone has fallen over 40 percent to \$1,181,000 in 2015. Estimates for annual maintenance of the entire MBS road system in a "like new" condition range as high as \$9M per year. Meanwhile, insufficient budget, leads to lack of maintenance, which then results in an enormous deferred maintenance burden (estimates as high as \$82M!).

For the SRS, Region 6 guidance directed that forests should align future road maintenance budgets with the average of the last 5 years of available funding. In the draft EA, we recommend that the Agency explain how a 15 percent reduction in costs for road maintenance in the Upper Nooksack aligns with expected future budgets. In addition, we would like to know whether these costs are for "basic" maintenance or the type of maintenance that is actually needed. What about bridges and culverts? And handling the deferred maintenance backlog?

| Road Maintenance Level | Mtn. \$/Mile | Current Road Miles | Proposed Road Miles | Change (miles) | Current Cost | Proposed Cost |
|------------------------|--------------|--------------------|---------------------|----------------|--------------|---------------|
| ML 3-5 | \$3,686 | 56.8 | 47.2 | -9.6 | \$209,379 | \$173,991 |
| ML 2 | \$633 | 65.4 | 58.4 | -7 | \$41,398 | \$36,967 |
| ML 1 | \$28 | 64.4 | 75.8 | +11.4 | \$1,803 | \$2,122 |
| Decomm. | \$0 | 0 | 5.2 | +5.2 | | \$0 |
| <i>Totals</i> | | | | | \$252,580 | \$213,081 |

VII. Determine whether there are unauthorized roads that need to be addressed

The SRS should have evaluated all of MBS's "system roads" which are the roads in the INFRA database. In some forests, there is a large network of "ghost roads" or unauthorized roads or orphan roads that are unaccounted for, are not in the database, yet continue to have impacts on natural resources.

In the Draft EA, we would like to know whether there are unauthorized roads in the Upper Nooksack project area and how they will be addressed.

VIII. Incorporation of Salmon Recovery Plans and Watershed Plans

According to the "Salmon and Steelhead Habitat Limiting Factors in WRIA 1, The Nooksack Basin" report of July 2002, sedimentation resulting from high road densities and landslides (from both timber harvest and

¹⁰ Costs are derived from MBS materials describing forest roads and annual road maintenance costs. Since ML3-5's are combined in one category in the scoping letter, the costs for ML5, 4 and 3 were added together and averaged. (ML5 - \$5938, ML4(High) - \$5237, ML4(Low) - \$2151, ML3 - \$1419.)

roads) has a considerable impact to salmonid spawning habitat in the Nooksack Basin. Recommended actions include (p.275):

- “Decommission or treat roads that are at a moderate to high risk of mass wasting potential in the North, South, and Middle Fork Nooksack sub-basins.
- Decommission or treat orphan roads that are at a moderate to high risk of mass wasting potential.”

The USFS has also consistently worked to improve aquatic habitat and watershed conditions, most recently under the “Watershed Condition Framework.” According to the Agencies assessment of 12 watershed health indicators in the sub-watersheds of the Nooksack, the roads/trails indicator is rated “poor” in Canyon Creek, Glacier Creek, Hedrick Creek (NF Nooksack River), Twin Lakes (NF Nooksack River), and “fair in the Headwaters (NF Nooksack River). This indicator is based on four factors: open road density, road/trail maintenance, road proximity to water and mass wasting. In order to improve watershed conditions, these factors must be addressed.

In the Draft EA, we recommend that the USFS analyze how road projects will result in reduced road densities, reduced risk of mass wasting/landslides, specific improved road/trail maintenance and ultimately result in tangible improvements to aquatic habitat and watershed conditions. When the projects are completed, will the roads/trails indicator rating for these sub-watersheds change from “poor” to “good”? Outline the stream crossings/culverts that are barriers to fish passage, how these will be addressed, and how much habitat will be accessible to listed species post-project.

IX. Consider climate change impacts and adaptation recommendations

Climate change intensifies the adverse impacts associated with roads. As the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience.¹¹ Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads, however, were poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations. And even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance needs.¹²

The USFS Pacific Northwest Research Station published a report titled “Climate Change Vulnerability and Adaptation in the North Cascades Region, Washington” (September 2014). The report describes the probable impacts resulting from changing climate and states (emphasis added):

“Hydrologic systems will be especially vulnerable as North Cascades watersheds become increasingly rain dominated, rather than snow dominated, resulting in more autumn/winter flooding, higher peak flows, and lower summer flows. **This will greatly affect the extensive road network in the North Cascades** (longer than 16 000 km), making it difficult to maintain access for recreational users and resource managers. It will also greatly reduce

¹¹ USDA, Forest Service, *National Roadmap for Responding to Climate Change*, at 26 (2011), available at <http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>

¹² USDA, Forest Service, *Water, Climate Change, and Forests: Watershed Stewardship for a Changing Climate*, PNW-GTR-812, at 72 (June 2010), available at http://www.fs.fed.us/pnw/pubs/pnw_gtr812.pdf.

suitable fish habitat, especially as stream temperatures increase above critical thresholds.” (Abstract, p.1).

The abstract also highlights recommendations to prepare for such changes, namely:

“For roads and infrastructure, tactics for increasing resistance and resilience to higher peak flows include installing hardened stream crossings, stabilizing streambanks, designing culverts for projected peak flows, and upgrading bridges and increasing their height. For fisheries, tactics for increasing resilience of salmon to altered hydrology and higher stream temperature include restoring stream and floodplain complexity, reducing road density near streams, increasing forest cover to retain snow and decrease snow melt, and identifying and protecting cold-water refugia.” (Abstract, p.2)

In the Draft EA, we recommend you consider climate change impacts and adaptation recommendations. We would like to see which roads are prioritized for storm-proofing, particularly as they relate to accessing recreational destinations and/or have known water quality impacts. In addition, we would like to see where undersized and vulnerable culverts are to be replaced since this is essential to protect roads from blowing out during storms. Proper maintenance and storm-proofing of roads should be evaluated and prioritized, which will have positive benefits not only for ensuring access but also for protecting natural resources.

Conclusion

Finally, we would like to re-iterate our support for this effort. The road system is becoming more fragile with each passing storm. We appreciate your attempt to remove unneeded roads, protect natural resources, maintain important access routes, and target limited budgets to the roads we do use. A thoughtful, strategic approach can achieve positive results and move us closer to the goal of a “Sustainable Road System.” We look forward to reviewing the Draft Environmental Assessment and are available for further discussion, if warranted.

Sincerely,

Tom Uniack
Conservation Director
Washington Wild
tom@wawild.org

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

Mark Menlove
Executive Director
Winter Wildlands Alliance
mmenlove@winterwildlands.org

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

Kitty Craig
WA State Deputy Director
The Wilderness Society
kitty_craig@twc.org

Carolyn Hope
President, Board of Directors
Evergreen Mountain Bike Alliance
president@evergreenmtb.org

Jen Watkins
Conservation Associate
Conservation Northwest
jwatkins@conservationnw.org

Blake Trask
State Policy Director
Washington Bikes
blake@wabikes.org

Joe Sambataro
National Access Director/ Northwest Regional
Director
Access Fund
joe@accessfund.org

Matt Perkins
Board Officer
Washington Climbers Coalition
matt@mattsea.com

Wendy McDermott
Associate Director Washington Conservation
Programs
American Rivers
wmcdermott@americanrivers.org

Eric Brown
Trail Director
Whatcom Mountain Bike Alliance
ebxtreme@earthlink.net

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

Katherine Hollis
Conservation and Recreation Manager
The Mountaineers
katherineh@mountaineers.org