



July 8, 20016

Erin Uloth, Mt. Baker District Ranger
Mt. Baker Ranger District, Mt. Baker-Snoqualmie National Forest
810 State Route 20
Sedro-Woolley, Washington 98284-1263

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

Re: Comments on the Mt. Baker Outfitter and Guide Project Draft Environmental Assessment

Dear District Ranger Uloth,

The following Pacific Northwest conservation and recreation organizations respectfully submit these comments on Mt. Baker-Snoqualmie National Forest's (MBS) Mt. Baker Outfitter and Guide Project Draft Environmental Assessment, a proposal to increase the number of outfitter and guide service days on National Forest lands on and around Mt. Baker. Our organizations support the proposal to increase the number of service days available in the Mt. Baker study area, and appreciate MBS's efforts to serve as a leader nationally on this particular issue. We believe that in order for people to care about stewarding a place, they have to know it - they have to explore it and love it. Increasing facilitated access to our public lands is importance to their future protection.

For almost three decades, MBS has not issued new priority use outfitter/guide special use permits. This has prevented many organizations from being able to offer facilitated outdoor experiences on the forest, creating barriers for groups of people, especially underserved minorities who often experience the outdoors through organizational programs. We believe in exposing people to our wild places because of the benefits of being outdoors and to build future constituencies that care about our public lands. Outfitters and guides play an important role in connecting people to national forests and to Mt. Baker specifically. They provide critical opportunities for recreation, education, and training, enabling visitors to participate in valuable recreational activities that foster an appreciation for and connection to the outdoors and the land.

General Comments in Light of USFS Guidance

The proposal to increase the number of outfitter and guide permits on Mt. Baker is timely given the Forest Service's recent release of guidance to improve the operation of the agency's outfitter-guide permitting system. In a letter of intent from Chief Tidwell, as well as documents explaining interpretation of agency permitting policy, the Forest Service has taken significant steps to streamline the permitting process to remove historic barriers for groups interested in accessing our national forests. Guidance documents on nominal effects determinations, programmatic analyses for outfitting and guiding activities, and National Environmental Policy Act (NEPA) requirements provide clarity around interpreting and carrying out agency policy in a way that makes the process of issuing permits more straightforward, efficient and, ultimately, more effective. By streamlining

the permitting process, this guidance aims to provide more access to national forests, increase opportunities for guided recreation, and enhance visitor services.

The Mt. Baker proposal to increase permitted outfitting and guiding opportunities in the Mt. Baker National Recreation Area and the Mt. Baker Wilderness, while initiated prior to the release of the guidance, reflects similar objectives in that it aims to better address and better meet the need for facilitated access. The proposal is also consistent with many of the recommendations contained in the guidance. It moves away from tight regulation of occupancy and use of Mt. Baker toward an emphasis on facilitating visitor services through guided recreation. It ends the moratorium on new permits, and it proposes a new – and more appropriate – limit to the pool of service days available for outfitter and guide permits.

We appreciate the overlap between the goals of this proposal and the Forest Service's national goals of improving permitting and increasing recreational access.

Comments on the Proposal

We support the Forest's proposed increase of service days authorized for outfitting and guiding on Mt. Baker. Many visitors to Mt. Baker rely on outfitters and guides or outdoor education organizations to provide the expertise, equipment, training, and supervision that enables them to experience the opportunities provided by the area, most notably climbing and mountaineering and other more technical backcountry-based recreational activities that visitors could not otherwise experience on their own. In addition, increasing service days would create access to permitted service days for non-profit, youth-serving, and educational organizations that provide opportunities for youth, local communities, and individuals who have been traditionally underrepresented in forest visitation. This proposed increase considers the current and potential future needs of the agency, the public, and the outfitters and organizations that would make use of the service days. At the same time, it considers the capacity of the area – including the Mt. Baker National Recreation Area and the Mt. Baker Wilderness – so as to create a pool of service days that does not surpass the social capacity or carrying capacity of Mt. Baker.

Expanding the presence of organizations and companies that fall under outfitter/guide permitting requirements supports sustainable recreation by introducing people to the outdoors safely and responsibly. Outfitter/guide companies and organizations incorporate low-impact/Leave Not Trace skills into their facilitated experiences. In doing so, they act as positive examples for the recreating public. Increasing permitted service days also creates additional revenue for forest management activities and demonstrates the role of recreation as a sustainable economic driver on our national forests.

We appreciate that the Forest recognizes the importance of expanding the amount of outfitting and guiding that is authorized on Mt. Baker. We also appreciate the flexibility that is built into the proposed increase in service days. Since the proposal would authorize up to 28,350 service days, a number that is higher than both present use and capacity, it would allow the Forest to increase use incrementally, monitor the effects of increased outfitting and guiding on the area, and adjust authorizations if needed.

The current limit on service days is restrictively low, and new permits have not been available for decades; as a result, many organizations have been operating without permits and/or using temporary use permits in recent years in order to provide the services that meet the demands of the public. Authorizing and issuing additional permits would not only accommodate the present use and need, but also provide flexibility for future recreational opportunities.

Comments on the Draft Environmental Assessment

The Draft Environmental Assessment (EA) provides a complete documentation of the purpose and need for the proposed action, the issues surrounding it, and the anticipated effects of implementing the proposal.

The Draft EA is realistic in its acknowledgment of potential environmental effects or consequences of the proposed action, and it leaves room for flexibility in monitoring and potentially adjusting permit administration in the future. In discussing the effects on recreation, it acknowledges the potential for crowding and for “choke points” along crowding routes, but it anticipates that increased use will not be high enough to create unacceptable levels of crowding. The Draft EA also recognizes the inherent interest that outfitters and guides have in self-regulating the concentrations of guided visitors. We appreciate that the Forest understands that outfitters and guides share an interest not only in providing true backcountry experiences for their clients, but also in protecting the forest resources and ensuring that they are not damaged or over-capacity. We also appreciate that the Draft EA acknowledges that in addition to benefiting guided visitors in general, increased service days are particularly important for getting underrepresented communities outdoors. The section on environmental justice recognizes that there may be a direct benefit to minority or low-income populations because of the increased number of permits available for educational and non-profit organizations that provide free or low-cost opportunities for these communities. It is crucial for the future of public lands that diverse and, at present, underrepresented populations are able to experience our natural resources, and this proposal will help provide more opportunities for them to do so.

With respect to the division of service days in the Proposed Action, we appreciate that the 28,350 total service days are divided between Wilderness and the National Recreation Area, with a limit of 6,426 total service days to be authorized in Wilderness areas and divided between different management areas within the Wilderness. It is important to pay special consideration to the potential impacts that additional authorized use could have on wilderness and its unique characteristics, and capping the service days authorized for the wilderness areas limits these potential impacts. The Draft EA acknowledges that, given the nature of guided climbing trips attempting to summit Mt. Baker, it is to be expected that there would be crossover from the National Recreation Area to the Wilderness Area. The result would be an estimated 5,846 service days, issued for the NRA that could occur in the Wilderness as well. The Draft EA finds that this proposed use would not have significant effects on the Wilderness or its wilderness characteristics, and that increased use would facilitate opportunities for visitors to experience these characteristics. We support the facilitation and enhancement of wilderness experiences available to the public, and we encourage the Forest to monitor any potential impacts on the Wilderness Area as authorized use is expanded to ensure that there are not unanticipated negative effects.

Acknowledging the sensitive alpine environment and the potential impact from an increase in recreational users, we also support the “pack it out” requirement for human waste included in the Proposed Action. We also support a hard look and continued public engagement in the development of a long-term Monitoring and Stewardship Plan for the proposal area, preferably in the year to follow the final decision.

Summary and Recommendations

In conclusion, we appreciate the Forest’s work to revisit the need and capacity for outfitting and guiding on Mt. Baker. Increasing the available service days in order to authorize more outfitting and guiding activities will help Mt. Baker meet the needs and demands of its visitors without exceeding the capacity of the area and its resources. This Proposed Action also serves as an important model to be potentially applied across the rest of the MBS to increase facilitated recreation opportunities in other popular areas.

As the Forest proceeds with the process of considering and evaluating the proposal, and in the future when the Forest considers authorizing service days for guided activities on Mt. Baker, we urge you, in light of the recent Forest Service guidance on enhancing and facilitating visitor experiences, to explore ways to further facilitate access. We encourage you to consider authorizing activities that would have nominal effects without requiring them to obtain permits or use service days and to look broadly for ways to apply existing Categorical Exclusions to proposed activities that would facilitate access. Simplifying the permitting process or using existing policy to eliminate unnecessary process or analysis would expand on the objectives of this current proposal. It could enable nonprofits and organizations that target youth or underserved communities to better provide their services and help the Forest Service reach new audiences and build new constituencies, and it could ultimately let more people visit and experience our national forests.

We support this current proposal examined in the Draft Environmental Assessment to increase the available pool of service days on Mt. Baker, and we appreciate the Mt. Baker-Snoqualmie National Forest for understanding the importance of meeting present and future visitors' needs and demands through increased opportunities for facilitated recreation and access.

Sincerely,

Courtney Aber, BOLD & GOLD Director
YMCA of Greater Seattle

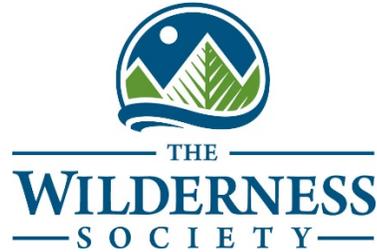
Eddie Espinosa, Western States Manager
American Alpine Club

Katherine Hollis, Conservation and Advocacy Director
The Mountaineers

Andrea Imler, Advocacy Director
Washington Trails Association

Joe Sambataro, NW Regional Director
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Tom Uniack, Executive Director
Washington Wild



July 7, 2016

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Re: Comments on the Mt. Baker Outfitter and Guide Project Draft Environmental Assessment

Dear District Ranger Uloth,

The Wilderness Society (TWS) and The Mountaineers respectfully submit these comments on the Mt. Baker-Snoqualmie National Forest's (MBS) Mt. Baker Outfitter and Guide Project Draft Environmental Assessment, a proposal to increase the number of outfitter and guide service days on National Forest lands around Mt. Baker. For years, our organizations have worked to end the 20-plus year moratorium on new outfitter-guide permits on the MBS and have been committed to instituting national permit reform to make it easier for youth and educational organizations to access and enjoy outdoor experiences on our public lands. Overall, our organizations support the proposal to increase the number of service days available in the Mt. Baker study area, and we applaud the MBS's efforts to serve as a leader across the country on this issue.

Introduction

The Wilderness Society (TWS) is a national conservation organization that represents more than 700,000 members and supporters who share our mission of protecting wilderness and inspiring Americans to care for our wild places. To ensure that people have readily available opportunities to connect with wild places, one element of our work focuses on national recreational policy. We aim to provide high-quality recreation opportunities on federal public lands and waters and to expand guided recreation in order to increase access to the outdoors. In particular, we seek to expand recreation opportunities for people who would not otherwise experience recreation on public lands or who do not have the training or equipment to go on their own. As a national organization with a strong regional focus in the Pacific Northwest, we have worked intently over the last decade to protect the last great wild places in the North Cascades and to make sure people can get to and access these incredible wild lands. We have worked closely with the MBS over the years to reform the permitting system to allow for more guided recreation opportunities on Mt. Baker and the entire forest.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,800 skilled volunteers lead 3,200 outdoor education courses and activities annually for 15,500 members and guests. Our youth programs provide over 6,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, protecting the outdoor experience for current and future generations.

TWS and The Mountaineers are both members of the Steering Committee of the Outdoor Access Working Group (OAWG), a coalition focused on sustainable facilitated recreational access to our public lands and waters. The OAWG represents nonprofit outdoor programs, universities, colleges, volunteer organizations and clubs, advocacy and user group organizations, and commercial outfitters and guides. For the past few years, the OAWG has worked to develop recommendations to improve the agencies’ permitting systems and processes to ensure greater responsiveness to the needs of both the agencies and the outdoor recreation community. By addressing existing challenges with the agencies’ permitting systems, our organizations hope to increase access and improve sustainable recreation on our public lands.

General Comments in Light of USFS Guidance

We would like to begin by expressing our support for the Forest’s efforts to revisit the need and capacity for outfitting and guiding on Mt. Baker. Outfitters and guides play an important role in connecting people to national forests and to Mt. Baker specifically. They provide critical opportunities for recreation, education, and training, enabling visitors to participate in valuable recreational activities that foster an appreciation for and connection to the outdoors and the land.

The proposal to increase the number of outfitter and guide permits on Mt. Baker is timely given the Forest Service’s recent release in June of guidance to improve the operation of the agency’s outfitter-guide permitting system. With a letter of intent from Chief Tidwell accompanied by documents explaining interpretation of agency permitting policy, the Forest Service has taken significant steps to streamline the permitting process to remove historic barriers for groups interested in accessing our national forests. The guidance documents on nominal effects determinations, programmatic analyses for outfitting and guiding activities, and National Environmental Policy Act (NEPA) requirements provide clarity around interpreting and carrying out agency policy in a way that makes the process of issuing permits more straightforward and efficient and, ultimately, more effective. By streamlining the permitting process, this guidance aims to provide more access to national forests, increase opportunities for guided recreation, and enhance visitor services.

The Mt. Baker proposal to increase permitted outfitting and guiding opportunities in the Mt. Baker National Recreation Area and the Mt. Baker Wilderness, while initiated prior to the release of the guidance, reflects similar objectives in that it aims to better address and better meet the need for facilitated access. The proposal is also consistent with many of the recommendations contained in the guidance. It moves away from tight regulation of occupancy and use of Mt. Baker toward an emphasis on facilitating visitor services through guided recreation. It ends the moratorium on new permits, and it

proposes a new – and more appropriate – limit to the pool of service days available for outfitter and guide permits.

We applaud the Forest for taking these steps to facilitate recreational opportunities on Mt. Baker, and we appreciate the overlap between the goals of this proposal and the Forest Service's national goals of improving permitting and increasing recreational access.

Comments on the Proposal

We support the Forest's proposed increase of service days authorized for outfitting and guiding on Mt. Baker. In order for people to care about protecting a place, they have to know it – they must explore it and develop a personal connection to it. Increasing facilitated access to Mt. Baker is therefore crucial to ensuring the future stewardship and protection of this stunning resource because it will allow more people to experience and love it. Many visitors to Mt. Baker rely on outfitters and guides or outdoor education organizations to provide the expertise, equipment, training, and supervision that enables them to experience the opportunities provided by the area, especially climbing and mountaineering and other backcountry-based recreational activities. In many cases, visitors could not otherwise experience these activities on their own. By increasing the service days available for outfitting and guiding, more visitors will be able to participate in these experiences, form valuable connections to Mt. Baker, and ultimately take a personal interest in its protection and future stewardship.

In addition, increasing service days would also create access to permitted service days for non-profit, youth-serving, and educational organizations that provide opportunities for youth, local communities, and individuals who have been traditionally underrepresented in forest visitation. When allocating additional service days among permittees and potential permittees, we expect the MBS to ensure equitable distribution among such non-profit and educational organizations as well as commercial outfitters and guides so that all stakeholders and all constituencies benefit from expanded access. Assuming such equitable distribution, this proposed expansion in service days considers the current and potential future needs of the agency, the public, and the organizations and outfitters that would make use of the increased access. At the same time, it considers the capacity of the area – including the Mt. Baker National Recreation Area and the Mt. Baker Wilderness – so as to create a pool of service days that does not surpass the social capacity or carrying capacity of Mt. Baker.

We appreciate that the Forest recognizes the importance of expanding the amount of outfitting and guiding that is authorized on Mt. Baker. We also appreciate the flexibility that is built into the proposed increase in service days. Since the proposal would authorize up to 28,350 service days, a number that is higher than present use but lower than the area's estimated social capacity, it would allow the Forest to increase use incrementally, monitor the effects of increased outfitting and guiding on the area, and adjust authorizations if needed. The current limit on service days is restrictively low, and new permits have not been available for decades; as a result, many organizations have been operating without permits and/or using temporary use permits in recent years in order to provide the services that meet the demands of the public. Authorizing and issuing additional permits would not only accommodate the present use and need but also provide flexibility for future recreational opportunities.

Comments on the Draft Environmental Assessment

The Draft Environmental Assessment (EA) provides a complete documentation of the purpose and need for the proposed action, the issues surrounding it, and the anticipated effects of implementing the proposal.

The Draft EA is realistic in its acknowledgment of potential environmental effects or consequences of the proposed action, and it leaves room for flexibility in monitoring and potentially adjusting permit administration in the future. In discussing the effects on recreation, it acknowledges the potential for crowding and for “choke points” along climbing routes, but it anticipates that increased use will not be high enough to create unacceptable levels of crowding. The Draft EA also recognizes the inherent interest that outfitters and guides have in self-regulating the concentrations of guided visitors. We appreciate that the Forest understands that outfitters and guides share an interest not only in providing true backcountry experiences for their clients, but also in protecting the forest resources and ensuring that they are not damaged or over-capacity. We also appreciate that the Draft EA acknowledges the value that the increased availability of permits will have not just for guided visitors in general, but also for underrepresented visitors in particular. The section on environmental justice recognizes that there may be a direct benefit to minority or low-income populations because of the increased number of permits available for educational and non-profit organizations that provide free or low-cost opportunities for these communities. To ensure the realization of this benefit, we encourage the MBS to ensure equitable allocation of additional service days among the various types of organizations and service providers that must obtain permits to operate in the area. It is crucial for the future of public lands that diverse and, at present, underrepresented populations are able to experience our natural resources, and this proposal will help provide more opportunities for them to do so.

With respect to the division of service days in the Proposed Action, we appreciate that the 28,350 total service days are divided between Wilderness and the National Recreation Area, with a limit of 6,426 total service days to be authorized in Wilderness areas and divided between different management areas within the Wilderness. It is important to give special consideration to the potential impacts that additional authorized use could have on wilderness and its unique characteristics, and capping the service days authorized for the wilderness areas limits these potential impacts. The Draft EA acknowledges that, given the nature of guided climbing trips attempting to summit Mt. Baker, it is to be expected that there would be crossover from the National Recreation Area to the Wilderness Area. The result would be an estimated 5,846 service days issued for the NRA that could occur in the Wilderness as well. The Draft EA finds that this proposed use would not have significant effects on the Wilderness or its wilderness characteristics, and that increased use would facilitate opportunities for visitors to experience these characteristics. We support the facilitation and enhancement of wilderness experiences available to the public, and we encourage the Forest to monitor any potential impacts on the Wilderness Area as authorized use is expanded to ensure that there are not unanticipated negative effects.

In addition, we support the “pack it out” requirement for human waste that is included in the Proposed Action. This requirement acknowledges the sensitive alpine environment and potential impact on this environment from an increase in recreational users. By requiring all visitors to the area to comply with the “blue bag” program, the overall result will be an increase in human waste removal and no negative impacts from additional guided use.

Finally, we support careful consideration and continued public engagement in the development of a long-term Monitoring and Stewardship Plan for the proposed area. Preferably, this plan would be developed in the year following the final decision.

Summary and Recommendations

In conclusion, we want to applaud the Forest again for revisiting the need and capacity for outfitting and guiding on Mt. Baker. Increasing the available service days to the proposed amount in order to authorize more outfitting and guiding activities will help Mt. Baker meet the needs and demands of its visitors without exceeding the capacity of the area and its resources. This Proposed Action also serves as an important model to be potentially applied across the rest of the MBS and the entire National Forest System to increase guided recreation opportunities in other popular areas. We applaud MBS for approaching this issue and setting an example for other Forests nationally. Availability

As the Forest proceeds with the process of considering and evaluating the proposal, and in the future when the Forest considers authorizing service days for guided activities on Mt. Baker, we urge you, in light of the recent Forest Service guidance on enhancing and facilitating visitor experiences, to explore ways to further facilitate access. We encourage you to consider authorizing activities that would have nominal effects without requiring them to obtain permits or use service days and to look broadly for ways to apply existing Categorical Exclusions to proposed activities that would facilitate access. Simplifying the permitting process or using existing policy to eliminate unnecessary process or analysis would expand on the objectives of this current proposal. It would enable nonprofits and organizations that target youth or underserved communities to better provide their services and help the Forest Service reach new audiences and build new constituencies. Ultimately, it would let more people visit and experience our national forests, helping them develop connections to our shared lands and take an interest in the future stewardship of these incredible natural places.

We support this current proposal examined in the Draft Environmental Assessment to increase the available pool of service days on Mt. Baker, and we applaud the Mt. Baker-Snoqualmie National Forest for understanding the importance of meeting present and future visitors' needs and demands through increased opportunities for facilitated recreation and access.

Sincerely,

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers

Kitty Craig
Washington State Deputy Director
The Wilderness Society

Paul Sanford
National Director of Recreation Policy
The Wilderness Society

Julia Marsh
Wildlands and Forest Policy Fellow
The Wilderness Society