



July 25, 2024

Brian McNeil
Acting District Ranger
Snoqualmie Ranger District
902 SE North Bend Way Bldg. 1
North Bend, WA 98045

RE: Carbon River Landscape Analysis Project #65083

Comments submitted electronically through the comment portal: [US Forest Service NEPA Projects Home \(usda.gov\)](https://www.usda.gov)

Dear Acting District Ranger McNeil,

On behalf of The Mountaineers, we appreciate the opportunity to submit comments to the Mt. Baker-Snoqualmie National Forest regarding the content of the proposed Carbon River Landscape Analysis project #65083. Our 16,000+ members regularly engage in outdoor recreation in the Carbon River Corridor and in other public lands throughout the Pacific Northwest.

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. 1,200 skilled volunteers lead 3,200 outdoor education trips and courses annually for 16,000+ members. Our youth programs provide over 15,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

As you know, The Mountaineers owns the Irish Cabin Property, which is just outside the Carbon River Entrance to Mount Rainier National Park (MRNP). The property is occasionally used for course field trips and is available for use by individual members for primitive camping. At this time, we do not plan to open the Irish Cabin Property to the general public for camping or other recreation activities. In addition to our Irish Cabin Property, Mountaineers use the Carbon River Corridor to access nature viewing, hiking, backpacking, camping, trail running, scrambling, and mountaineering opportunities. We also value the Corridor for its natural conservation values, including the inland temperate rainforest ecosystem, habitat for wildlife and threatened species, and contribution to climate resiliency.



We reviewed the Scoping Letter and supporting documentation and are offering comments sharing our support and requesting clarification and attention to several issues described below. We are particularly interested in management actions that maintain and improve public access to the Clearwater Wilderness while addressing environmental degradation in the area. We ask that these matters be addressed in the CARLA Environmental Assessment (“EA”).

Please find our detailed comments on the Scoping Letter below:

Forest Service Road (FSR) 78 (Page 26-27)

The Mountaineers strongly supports **Option 1 for FSR 78**. FSR 78, or Carbon River Road, provides the only viable access to recreation in the Clearwater Wilderness area and to the NW corner of Mt. Rainier National Park, and to two essential trails in the Carbon River Corridor: Summit and Coplay lakes. Pursuing Option 1 would allow our members, and the recreation community at large, to continue to access critical outdoor teaching spaces and recreation opportunities in the area, including hiking, camping, and backpacking. We are opposed to Option 2 (decommissioning FSR 78) because decommissioning would prevent recreationists from reaching the Clearwater Wilderness Area, while we believe Option 3 is insufficient, considering the likelihood of a catastrophic flooding event in the near future. We strongly urge the Forest Service to prioritize maintaining recreation access to this area.

Transportation System (Page 24-27)

We are supportive of the proposed action to extend the existing FSR 7810 bridge. However, we hope the U.S. Forest Service also considers repairing the final, and roughest, section of FSR 7810 approaching the Summit Lake Trailhead. The decay of FSR 7810 has impacted the ability of our members, and the general public, to safely access Summit and Coplay lakes. Improvements to this road would also reduce negative environmental impacts, including sediment runoff into the Carbon River.

The Scoping Letter states that “the maintenance and reconstruction of existing system roads is proposed,” but with the exception of FSR 78, does not specify what roads are being considered for maintenance. We hope the CARLA EA identifies specific roads considered for maintenance, including prioritizing the repair and maintenance of FSR 7810, so that the general public - not just recreationists with high clearance vehicles - can access inspiring outdoor experiences including hiking and camping at Coplay and Summit lakes. Funding opportunities such as the Great American Outdoors Act and the Legacy Roads and Trails program can be explored to help fund these improvements.

Coplay Campground and ADA Accessible Trail (Page 27-28)

We believe the Coplay Campground and ADA Trail proposed action would preserve Coplay Lake’s delicate shoreline and vegetation while improving both day-use and overnight recreation access to the area. We fully support the construction of an ADA-accessible shoreline trail, and the development of 3-4



campsites with parking and 4-6 semi-primitive walk-in campsites. We believe these recreation improvements will consolidate use and mitigate negative impacts on the landscape.

We are also pleased to see the proposal to install educational signage around Coplay Lake. We hope signage addresses three critical concerns in the area: OHV and other motorized use in unauthorized areas, including East Lake, the trampling of shoreline vegetation, and the protection of ecological and Tribal resources. Please consider equity concerns, such as translation into multiple languages, low English proficiency, and technological limitations, when developing signage. We also encourage you to consult with Tribal partners to include their history and culture in these educational resources.

New Coplay Trailhead and Spur Trail to Summit Lake Trailhead (page 28)

Summit Lake Trail (#1177) is the primary entry to the Clearwater Wilderness area and a popular route for recreationists. We are encouraged by the proposal to address congestion at the Summit Lake Trailhead by constructing a new trailhead near Coplay Lake with parking for approximately 40-50 vehicles and a new spur trail from Coplay Lake to the Summit Lake Trailhead. Considering the popularity of this hiking area, we hope the CARLA EA collects visitor use data to determine whether 40-50 new parking spots is sufficient to protect recreation access and forest health. Additionally, if the CARLA EA explores the possibility of instituting a parking reservation system, we ask that the U.S. Forest Service addresses equity concerns, including technological limitations, and communication strategies for sharing this system with the general public, including low-income and multilingual communities, in their proposal to develop such a system.

Tolmie Falls Trailhead and Trail and Camping (Page 30)

The Mountaineers is supportive of this proposed action, but we believe these recreation infrastructure projects - especially the development of a formalized parking lot - must be developed in a sustainable manner, with consultation with Tribal partners, and balanced with environmental conservation priorities. We also ask that the U.S. Forest Service consider installing educational signage for motorized users alongside the proposed action to “install barriers to prevent vehicles from entering the dispersed camp area adjacent to the creek.”

Carbon River Dispersed Camping Ban (page 32)

We recognize the need for and support the proposed Carbon River Dispersed Camping ban. As the scoping letter outlines, illegal and unsanctioned use of the dispersed camping area is a major concern, including the dumping of large piles of trash. However, with the exception of Evans Creek Campground, which is more suited to the needs of OHV recreationists, there are few suitable camping options in the project area. We are concerned that without additional camping options in the greater Carbon region, people will find other places that are unsuitable for overnight camping. In other words, misuse of the Carbon River floodplain may transfer to another location. We encourage the U.S. Forest Service to work



with the Mt. Rainier National Park Service to explore the possibility of developing a nearby campground for non-OHV users.

Other Comments for the EA

- The Mountaineers fully supports the proposal to install a toilet at Summit Lake and Celery Meadows Trailhead (Page 30)
- In general, we support improvements for non-motorized access. The EA should examine opportunities for both more trails and improvements to existing trails where resource damage has been evident.
- The Mountaineers appreciates how the Forest Service has included the interests of the Tulalip Tribes, Muckleshoot Tribe and Puyallup Tribe in the analysis. We encourage continued engagement with Tribes throughout this landscape analysis process, during implementation and in future stewardship of the project area. The EA should strive and recognize the need to balance recreational usage with wildlife and Tribal treaty rights.
- The EA should address and consider the possibility of installing temporary access to recreation areas in the event of road, parking lot, camping, and trail closures during project implementation. We are particularly interested in how the U.S. Forest Service plans to manage temporary access to the Clearwater Wilderness Area, including Summit and Coplay Lake, if the agency moves forward with Option 1 (relocating FSR 78).
- In 2021, we provided comments to Pierce County Parks on the Draft Carbon River Corridor Cooperative Action Plan (please see attached). We hope the U.S. Forest Service considers exploring some of the projects we suggested in 2021, including:
 - Partnering with Mt. Rainier National Park to repair and improve Mowich Lake Road, the Rainforest Trail, and the Historic Boundary Trail within the Park.
 - Convening a signage work group for logo development, sign standardization and common symbolism.

We deeply appreciate the U.S. Forest Service's diligent work to develop this project, including their commitment to accessible and sustainable recreation. Thank you for the opportunity to comment, and we look forward to being informed of future developments.

Sincerely,



THE MOUNTAINEERS

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