



February 9, 2016

Martie Schramm
Snoqualmie District Ranger
Mt. Baker-Snoqualmie National Forest
902 SE North Bend Way
North Bend, WA 98045

RE: Joint Comments on Proposed Dirty Harry Roads to Trail Project

Dear District Ranger Schramm:

The undersigned conservation and recreation organizations are writing to express our strong support for the proposed Road-to-Trail conversion of 2.42 miles of a non-system Forest Service road that would connect the Washington State Parks trailhead to Dirty Harry Peak and the obliteration of 0.31 miles of non-system road spurs.

Many of our organizations have supported the efforts by the MidFORC Coalition and Mountains to Sound Greenway Trust over the past two decades to enhance and improve recreational access in the Snoqualmie Valley. More recently, our organizations supported the designation of the Alpine Lakes Wilderness Additions (2014). The Snoqualmie Ranger District includes some of the closest and most accessible recreational opportunities for families and outdoor enthusiasts in the state. We not only value protecting wild places, but also want to make sure that access roads and trails are maintained to ensure that people can enjoy these wild places.

Dirty Harry Road-to-Trail Conversion

We strongly support the Forest Service's proposed Dirty Harry Road-to-Trail conversion to convert approximately 2.42 miles from non-system road to trail. The Forest Service project is a small but important part of the larger Dirty Harry Peak Trail construction which is located primarily on state lands. Years of cooperation between the climbing and hiking communities and state and federal land management agencies have culminated in this remarkable opportunity to provide an important recreational opportunity across multiple land ownerships.

Previously, the lower section of the trail received significant use from climbers as part of the popular Exit 38 Far Side climbing area. This area is one of the top five most popular climbing areas in the state. This project provides an opportunity to formalize the climbing access to this area and add hiking access to Dirty Harry Peak. Due to the accessibility and proximity to the greater Seattle metropolitan area, there is strong demand to day hikes to peaks in the I-90 recreation corridor.

Watershed Restoration and Legacy Road Remediation

Many of our organizations also recognize the challenges around restoring healthy watersheds in our National Forests. The USFS' Watershed Condition Framework assessment concluded that 78% of Washington's watersheds are negatively impacted by roads. Yet road maintenance budgets dropped 82% since 1990. This is why we also advocate for federal funding, including the Legacy Roads and Trails Remediation Initiative, which is targeted to address these specific watershed impacts. Legacy funds are applicable for project treatments that include road decommissioning, road stormproofing, restoring or enhancing fish passage on streams and trail reconstruction, including road-to-trail conversions.

We are pleased to see the agency work to restore watersheds and that the reduction of erosion and restoring of stream connectivity in Museum Creek is clearly identified in the Purpose and Need for this project. The proposal would decommission approximately .31 miles of non-system road spurs. It appears that most of the work would occur in the already compacted road prism, but we also caution the Forest Service from any additional actions that could cause more compaction and harm. Since this project should benefit aquatic resources, Legacy Roads and Trails may be a funding source that the District could consider seeking support from.

Use of a Categorical Exclusion

We understand that this project is being proposed to take place under a Categorical Exclusion (CE) under the National Environmental Policy Act. While we feel that the use of a CE should be limited and judged on a case by case basis, we feel that a CE is appropriate in this case given the work as described in the scoping letter. Pursuant to 36 CFR 220.6(e) a proposed action may be excluded from further analysis and documentation in an EIS or an EA if the proposed action falls within a list of categories including "construction and reconstruction of trails." In addition, a CE can be used for "non-system" roads, as is the case with this project.

The need to provide for more outdoor recreational opportunities in places close to the Seattle metropolitan area, without increasing harm to natural resources, is critical. Many of the more accessible trails can be extremely crowded on peak weekend days. Projects such as this one – which fixes a past harm, reduces impacts to aquatic resources, and adds recreational opportunity - are needed to ensure that residents and visitors can have an enjoyable experience on these public lands we all own. In addition, the Dirty Harry Trail is another asset that will foster local economic benefits to local communities like North Bend and Snoqualmie.

Thank you for your consideration of these comments.

Sincerely,

Tom Uniack
Conservation Director
Washington Wild
tom@wawild.org

Joe Sambataro
National Access Director & NW Regional Director
Access Fund
joe@accessfund.org

Jon Hoekstra
Executive Director
Mountains to Sound Greenway Trust
Jon.Hoekstra@mtsgreenway.org

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

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers
katherineh@mountaineers.org

Tom Hammond
President
North Cascades Conservation Council
tphammond@gmail.com

Eddie Espinosa
Western States Manager
American Alpine Club
eespinosa@americanalpineclub.org

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

Yvonne Kraus
Executive Director
Evergreen Mountain Bike Alliance
yvonne@evergreenmtb.org

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

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

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

Karl Forsgaard
President
Alpine Lakes Protection Society
karlforsgaard@comcast.net

Harry Romberg
National Forest Committee Chair
Washington Chapter of the Sierra Club
HBRomberg@aol.com

cc: *Jamie Kingsbury, Forest Supervisor, MBSNF*
Gary Paull, Wilderness & Trails Program Coordinator, MBSNF
Rachel Lipsky, Environmental Coordinator, MBSNF
Gordie Blum, R6 Director Recreation, Lands and Minerals