



February 9, 2016

Rachel Lipsky, Environmental Coordinator
Snoqualmie and Skykomish Ranger Districts
Mt. Baker – Snoqualmie National Forest
902 SE North Bend Way
North Bend, WA 98045

RE: Proposed Talapus Lake Trail Reconstruction Project

Dear Ms. Lipsky:

We are writing to support the Mt. Baker Snoqualmie National Forest's proposal to reroute the Talapus Lake Trail within the Alpine Lakes Wilderness in the Snoqualmie Ranger District.

Our organizations are deeply committed to preserving the wilderness values and characteristics of the public lands the United States Congress has included in the National Wilderness Preservation System for current and future generations. We understand that future support for our nation's special places is largely reliant on a citizenry that is actively engaged in experiencing and enjoying these lands. Wilderness designation provides the highest level of protection for ecological and recreation values into the future and it is critical that current and future generations have the opportunity to experience wilderness first-hand to understand and support the continued protection of Wilderness. We hold high value for continued access to safe trails and recreational experiences in designated Wilderness.

The Talapus trail system is one of the most popular trails on the Forest and is easily accessible from the I-90 recreation corridor. Parts of the trail were poorly sited in wet terrain and can be difficult to follow. This issue combined with significant foot traffic has led to negative impacts to soils and vegetation.

The proposal includes maintenance, reconstruction and partial relocation of the Talapus Lake and Talapus Cutoff hiking trails primarily within the Alpine Lakes Wilderness. The project would include 3.1 miles of the Talapus Lake Trail from the trailhead to Olallie Lake and the .2 mile Talapus Cutoff Trail to the junction with the Pratt Lake Trail.

According to the project notice, a steel 30-foot I-beam bridge is to be installed over the Talapus Lake Outlet Creek (Segment #3) and a 30-foot log stringer bridge over the Olallie Lake Outlet Creek (Segment #2). We would ask that the agency consider whether the additional cost of using steel for the bridge crossing in segment #3 is warranted or necessary given the Wilderness character of the area. The use of native materials (i.e., wood, logs) should be prioritized if at all possible.

Our understanding is that the agency is developing a minimum requirement analysis (MRA) with a recommendation to use a limited number of helicopter flights in order to haul trail construction material and bridge components on site as well as the use of rock drills. Onsite and native material is in very short supply in the area of this project. We would expect the number of flights should be low (perhaps half a dozen flights) given the amount of material that needs to be flown in.

We do not take lightly the use of the exception in the Wilderness Act that would allow the use of motorized equipment. We regard the use of the agency's discretion under the Wilderness Act as something to be considered carefully on a case-by-case basis. Based on conversations with staff on the Forest, we feel that the limited use of helicopter flights to haul and remove materials and employment of a rock drill was acceptable in this instance. In the future we recommend that a completed MRA be provided with the initial Notice of intent so that it can be reviewed during the public comment period.

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."

All of our organizations supported the recent 2014 designation which added 22,000 acres to the Alpine Lakes Wilderness and two Wild and Scenic Rivers. Part of this project is included within those additions. This project is consistent with the goals of our organizations to enhance public use and enjoyment of wilderness. The end result will be a long term sustainable trail with minimal maintenance leads that will serve current and future generations of recreationists visiting the Alpine Lakes Wilderness.

Thank you for the opportunity to share our perspective on this project.

Sincerely,

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cc: *Jamie Kingsbury, Forest Supervisor, MBSNF*
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