



November 7, 2016

Jeffery Rivera
 Wenatchee River Ranger District
 600 Sherbourne St.
 Leavenworth, WA, 98826

Submitted by electronic mail: dyoukey@fs.fed.us

RE: Draft Environmental Assessment (EA) for the Number Two Canyon Trails Project

Dear District Ranger Mr. Rivera:

The undersigned conservation, recreation and local business leaders are writing to express our support for the proposed Number Two Canyon Trails Project, which would construct or improve nearly 30 miles of non-motorized trail, two trailheads and a downhill and skills mountain bike park area in the Number Two Canyon area in the Wenatchee River District. Additionally, the project would improve access on 1.2 miles of roads and decommission .1 mile of an old legacy road for the purpose of watershed restoration.

Many of our organizations have supported sustainable recreation opportunities on Washington national forests including the Okanogan-Wenatchee National Forest. Each year in Washington, outdoor recreation generates \$21.6 billion in consumer spending and 200,000 direct jobs.¹ The steady flow of visitors is critical to the economies of communities like Wenatchee. Visitors stop to spend money on meals, buy groceries, purchase gear, sign up for paddling, horseback riding, backpacking, mountain biking or other recreational trips, and stay overnight at hotels and vacation rentals in towns that are the gateways to our national forests.

Purpose and Need of the Project

The stated Purpose and Need of the project is to develop a sustainable non-motorized multi user recreational trail system that would connect with the adjacent trail systems, improve road access and trail heads and restore previously disturbed areas due to unauthorized trail use (EA Pg. 3). The project gives significant

¹ Economic Analysis of Outdoor Recreation in Washington State,” Earth Economics. 2015.
<http://www.rco.wa.gov/documents/ORTF/EconomicAnalysisOutdoorRec.pdf>

thought to balancing the previous unauthorized trail use in the area and developing a sustainable trail system while providing restoration benefits for the larger watershed.

The Wenatchee River Ranger District includes some of the closest and most accessible recreational opportunities for families and outdoor enthusiasts in the state. The proposed trail system in the Number Two Canyon is located just 4 miles west and just 10-15 minutes from Wenatchee, the largest population center near the Wenatchee River Ranger District. The area is also about a half hour from the community of Leavenworth, WA. This project would connect the Chelan Douglas Land Trust's Sage Hills/Horse Lake Reserve trail system with the Number Two Canyon trail system which will help to meet increasing demand for non-motorized recreational opportunities near Wenatchee.

Non-Motorized Recreational Opportunities

We support the focus on developing a non-motorized recreation area. The first stated need for this proposal is "to develop non-motorized trails in the Number Two Canyon/Horse Lake Mountain area that would provide a variety of multi user trails opportunities because there is currently a shortage of this type of trail system close to the greater Wenatchee community" (EA Pg. 3). With the Motorized Vehicle Use Map still not completed for the Okanogan-Wenatchee National Forest and no management of winter motorized recreation, there are few areas that are specifically managed for safe, quiet, quality, conflict free, and accessible backcountry non-motorized recreation.

While designated Wilderness areas provide a great opportunity for non-motorized recreation, lower elevation areas close to communities are underrepresented in what was designated 30 years ago. Additionally, these designated Wilderness areas do not allow for mountain bike use as mechanized use is prohibited by the Wilderness Act.

We understand that the Number Two Canyon Area north of Forest Service Road 7101 to Horse Lake Mountain has been managed as a non-motorized area since the Martin Ranch area was acquired (1966 and 1996) to provide non-motorized recreational opportunities and meet wildlife needs, including winter range for mule deer. To that end we support the project's adoption of a Forest Order Area Closure to restrict the use of motorized vehicles on roads and trails in the project area year-round with the exception of FS Road 7101 (which would remain open to over-snow vehicles in the winter, and when the gates are open) and FS RD 7101-500 (which would be open to the new Martin Ranch trailhead when the gate is open but closed to vehicle traffic and snowmobile use in the winter). All motorized off-road travel would be prohibited. (EA Pg. 82).

We would ask that the description of the motorized area closure be clarified to make clear that the no motorized use (including snowmobile use) would be allowed beyond the existing gate at the 7101-500 spur junction. We understand that is the intent but it is less than clear in the current EA.

Non-Motorized Winter Recreation

There is little discussion about the non-motorized winter recreation opportunities in the Number Two Canyon area (i.e., backcountry skiing, snowshoeing, cross country skiing, etc.). Due to conflicts with snowmobile use, quality winter non-motorized recreation areas are underrepresented on the national forest. Backcountry skiers and snowshoers seek out non-motorized settings and are being displaced from their traditional recreation areas by advances in snowmobile technology.

There exist very few areas in close proximity to Wenatchee where backcountry skiers and snowshoers can experience a quality, quiet, non-motorized outing. The Number Two Canyon area provides excellent opportunities for winter non-motorized recreation off of the 7101 road. As the Okanogan-Wenatchee National

Forest moves into winter travel planning we would like to see the opportunities for winter non-motorized recreation in Number Two Canyon acknowledged and expanded to include ski and snowshoe trails.

We appreciate that the deer winter range seasonal closure area has been adjusted to allow non-motorized winter recreation like snowshoeing and cross country skiing confined to the road prism of 7101-500 (Pg. 86). This balances the interest in low impact winter non-motorized recreation close to the population center of Wenatchee and the need to protect wildlife wintering habitat in this area.

We recommend that the District looks toward and plans for future opportunities to expand winter non-motorized recreational opportunities and suggest that language be included throughout the EA that highlights this opportunity for winter non-motorized recreation. Only the map caption in the Appendix clarifies this opportunity but does not reference the activities it would support (i.e., snowshoeing and backcountry skiing). The adjustment to the seasonal closure should be identified as meeting the Purpose and Need of the project as well.

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 incorporate watershed restoration by decommissioning approximately .1 mile of an old legacy road spur. The agency should consider the Legacy Roads and Trails fund as a potential funding source for this portion of the project.

Thank you for your consideration of these comments. Please feel free to contact any of the signatories below.

Sincerely,

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