



Protect America's Climbing



July 25, 2018

Yewah Lau, District Ranger
c/o Dana Butler
Olympic National Forest Supervisor's Office
1835 Black Lake Blvd. SW, Olympia, WA 98512

Submitted by form at:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=49643>.

RE: Comments on the Preliminary Environmental Analysis for the Dungeness Watershed Roads Management Project

Dear District Ranger Lau:

Olympic Peninsula Climbers, The Mountaineers, Evergreen Mountain Bike Alliance, Access Fund, Washington Climbers Coalition and Washington Trails Association – all human-powered recreation organizations in Washington State – come together to work on issues relating to recreation, access and conservation and represent more than 33,500 members who recreate on public lands.

As organizations that represent hikers, climbers and mountain bikers in Washington state, our interest lies not only in developing and maintaining trails and climbing areas, but also in the road system that provides access to those trails and the wild places they lead to. We recognize that without a well-maintained, safe and fiscally-sufficient road system, our members may lose access to the trails and places they love.

In a 2013 speech before recreation professionals, then-Associate Chief of the United States Forest Service, Mary Wagner, stated: "Outdoor recreation is by far the single greatest use of the National Forest System, dwarfing every other use."¹ The Olympic National Forest provides a multitude of recreation opportunities for hikers, climbers and mountain bikers from the Olympic Peninsula and the greater Puget Sound region. As the EA states on pages 106-107, "according to National Visitor Monitoring (NVUM) data collected on the Olympic National Forest in 2015, approximately 70 percent of recreational users were participating in dispersed recreational activities during their visit (USDA Forest Service 2017)." Additionally, the EA on page 106 states that "the area is heavily used by hikers both inside and outside of the Buckhorn Wilderness boundary."

Washington state is rapidly growing. Our state population was 4.1 million in 1980. Today it has nearly doubled to approximately 7.3 million and is estimated to grow to 9.1 million by 2040. With this growth comes increased demand for outdoor recreation opportunities as more and more people are seeking ways to explore our natural world.

¹ <https://www.fs.fed.us/speeches/outdoor-recreation-national-forest-system>

As Washington state continues to see its population grow, coupled with a continued increase in the number of people hiking, climbing and mountain biking, our organizations advocate for continued access to the places people love to explore and strongly support new, sustainably built trails to help disperse use and create positive recreational experiences.

Our organizations make the following comments as they pertain to the Preliminary EA:

Forest Road 2870270 – Maynard Burn Trailhead

We support keeping road 2870270 open year-round as an ML2. We oppose the proposal in Alternative B to introduce a seasonal closure between June 1 and August 31, which would effectively eliminate drivable access to this trail and the climbing area on Tyler Peak during the entire peak summer recreation season. We appreciate the inclusion of measures under Alternative A to protect the Taylor’s Checkerspot Butterfly habitat while retaining access to the trailhead. Additionally, the Olympic Peninsula Climbers community is willing to help maintain the 270 spur (insofar as work that can be performed by a hand crew) if it will help preserve year-round access.

Forest Road 2870230 - Lower Dungeness / Gold Creek Trailheads

We appreciate the Forest Service’s willingness to relocate the Gold Creek/Lower Dungeness Trailhead to an area that does not suffer from chronic landslides, which has reduced access and the size of the parking area. We are concerned with the additional mileage the proposed relocation under Alternatives A and B would create for trail users.

We request a feasibility analysis for a new trailhead parking lot at the switchback 0.3 miles before the original trailhead. Relocating the parking lot closer to the original trailhead would reduce the additional mileage from almost 2 miles to 0.3 miles. Using the switchback as a parking lot, round-trip mileage would be significantly reduced from 4 miles to 0.6 miles, creating a better experience for hikers and other trail users.

While we greatly prefer a potential new trailhead at the switchback due to the reduced additional mileage that would be incurred, if the analysis demonstrates that a new parking area and trailhead isn’t feasible due to unstable slopes at this switchback, our organizations support the relocation of the trailhead to the junction of Forest Roads 2870000 and 2870230.

Forest Roads 2870000 – Tubal Cain Trailhead & Silver Lakes Way Trail

Tubal Cain Trailhead Improvements

The Tubal Cain is a very popular trail in Olympic National Forest, which provides access to a handful of trail connections, including the Tull Canyon, Upper Dungeness and Upper Big Quilcene trails. Enlarging the trailhead to improve parking for more user groups is necessary as the current parking area is inadequate and does not allow for horse trailers. **Our organizations support enlarging the Tubal Cain Trailhead.**

Forest Roads 2870000 & Silver Lakes Way Trail

As noted in the EA on page 110, the Silver Lakes way trail is a “historic access route to the Silver Lakes area.” The Silver Lakes way trail provides a day hike option for Silver Lakes at approximately 6 miles round-trip versus the longer route via the Mt. Townsend trail, which is 11 miles round-trip and well-suited for overnight backpacking trips. The way trail also provides an alternate route to reduce the impact on the extremely popular and heavily used Mt. Townsend trail and trailheads.

We agree with the Forest Service’s assessment on page 110 of the EA that the Silver Lakes way trail does not currently meet Forest Service trail standards and is not in a sustainable location. Therefore, **we**

request that the Forest engage recreational user groups in a process to assess the Silver Lakes way trail for rerouting to formalize the trail into the Forest Service’s official trail system. The Silver Lakes way trail is a historic route and as noted above, provides a valuable recreation opportunity for the Olympic National Forest as a day hike that can reduce the impact to the heavily used Mt. Townsend trail. As the National Strategy for a Sustainable Trail System (USDA Forest Service 2016) states: “We can harness the energy, talent, and resources of the trails community by sharing stewardship— by making trails and trail management a collective priority.” We agree and understand that there are a number of recreation user groups and hikers on the Olympic Peninsula who care about the Silver Lakes way trail and would like to be engaged in determining how the way trail can be sustainably designed and developed into a system trail that will ensure continued access into the future.

Until the Silver Lakes way trail can be assessed, in collaboration with recreation user groups, for inclusion into Olympic National Forest’s trail system, we request that the 1.5 mile segment of Forest Road 2870000 beyond the Tubal Cain trailhead remain open to passenger vehicles.

Pacific Northwest National Scenic Trail

The Pacific Northwest National Scenic Trail (PNT) was designated in 2009. The route cross three states: Montana, Idaho and Washington. The majority of the trail is in Washington state, spanning the northern half of the state from the Pacific Ocean to the Idaho border.

The PNT traverses the Olympic National Forest and the Dungeness watershed. While the current route is utilized by hikers, equestrians and mountain bikers now, the route has not been formally designated. A Pacific Northwest National Scenic Trail Advisory Council was created in 2015. The Council’s first project, in partnership with the United States Forest Service, was to help develop a comprehensive plan for the trail, which would identify a designated route for the trail.

The Hood Canal Ranger District has an opportunity to look at the Dungeness Watershed Roads Management Project in the context of what the PNT’s formal route might be through the watershed. We know that a number of conversations have taken place over time to begin identifying potential road-to-trail conversions for the sections of the route that traverse areas without trails.

We recommend that the Forest Service take a proactive approach with the Dungeness project and identify roads that can be converted to trail for the designated PNT route as part of this project.

Conclusion

Thank you for considering our comments on the Preliminary Environmental Assessment for the Dungeness Roads Management Project. We look forward to continued involvement in this project as it develops. Please let us know if you have any questions or if we can be helpful.

Sincerely,

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Washington Trails Association

Yvonne Kraus
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Evergreen Mountain Bike Alliance

Katherine Hollis
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