



November 13, 2020

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District Ranger
Snoqualmie Ranger District
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North Bend, WA 98045
Submitted Electronically to <https://www.fs.usda.gov/project/?project=53997>

RE: Middle Fork Snoqualmie and Pratt Rivers Comprehensive River Draft Management Plan Comments

Dear District Ranger Schramm:

Thank you for the opportunity to comment on the Comprehensive River Draft Management Plan (CRMP) for the Middle Fork Snoqualmie and Pratt Rivers. This is an exciting opportunity to provide long term protection and management for these remarkable river corridors. The Middle Fork Snoqualmie Valley is one of the closest mountain valleys to the greater Seattle metropolitan area and receives considerable attention from a variety of users. We hope this plan will be able to strike an appropriate balance to managing this area for: (1) ecological function, (2) sustainable public recreation, and (3) protecting tribal lifeways and exercising the federal government’s obligation to protect tribal treaty rights.

We recognize that the lands being considered for management by the U.S. Forest Service are the ancestral land of Coast Salish Peoples including the Tulalip and Snoqualmie Peoples past and present. We honor with gratitude the land itself, and those who have been the responsible stewards of these lands and waters since time immemorial.

Some of the undersigned organizations have been engaged in the Alpine Lakes Area planning processes for decades. Some were involved in planning decisions for this area since the RARE I process of 1973-1974. Many were supportive in advocating for the passage of the Alpine Lakes Wilderness Act which protected much of the higher elevation areas in the Middle Fork Valley in 1976 as well as the subsequent Alpine Lakes Area Management Plan in 1981. Others were leaders in partnering with the Forest Service and the King County Sheriff’s office to combat the negative influence for decades of shooting, chop shops, garbage dumping, and other illegal activities throughout the valley. Most played a leadership role or were supportive in advocating for the designation of Wilderness additions and Wild and Scenic River designations that became law in 2014.

This draft CRMP is focused on final corridor definition and management within the Wild and Scenic River designation for the Middle Fork Snoqualmie and Pratt Rivers as designated by the Alpine Lakes Wilderness and Middle Fork Snoqualmie and Pratt Rivers Act in 2014. This designation identified different classifications (wild and scenic) on approximately 34 {{The CRMP says 28.2 miles, page 6 CRMP}} miles of the Middle Fork Snoqualmie River and approximately 9 {{The CRMP says 10.1 miles, page 6 CRMP}} miles of the Pratt River.

We appreciate the effort and analysis that has been put into the draft plan by Forest Service staff. Overall, we think the plan is a solid attempt at identifying appropriate management for the two Wild and Scenic River

corridors. We have the following comments and suggestions on the draft plan which we expect to be considered as a final plan is developed.

I. Botany/Ecology Should Be Included as an Outstandingly Remarkable Value for the Middle Fork Snoqualmie and Pratt Rivers

The Middle Fork Snoqualmie River was found to possess outstandingly remarkable values for both fish and recreation and the Pratt River was found to have outstandingly remarkable values for fish. Both rivers were found eligible for additional outstandingly remarkable values in the 1990's. The draft plan indicates that new requirements prevented some of those values from being included in this plan. However, we feel that the occurrence of Sitka spruce in the valley is significant and should be included as an outstandingly remarkable value for the Middle Fork Snoqualmie River.

The Middle Fork Sitka spruce forests represent an outstandingly remarkable value and should be included in the final plan for the Middle Fork Snoqualmie and Pratt Rivers. To be considered as an outstandingly remarkable value, "a river value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale" (FSH 1909.12 80.14). Due to land conversion and development in the Puget Sound lowlands, Sitka spruce are largely absent from the landscape. The remaining Sitka spruce stands within the Middle Fork Snoqualmie River valley are located within the river corridor, contribute substantially to the river ecosystem, and owe their presence to the microclimate the river provides.

We believe the decision articulated in the scoping notice and the draft CRMP to drop consideration of this outstandingly remarkable value is based on an incomplete assessment.

"Though the extent of Sitka spruce in the project area has not been well mapped, it is believed to be largely confined to the Pratt River corridor with potential for other small groupings or individuals throughout the larger drainage." (CRMP, pg. 65)

The greatest extent of Sitka spruce forest in the Middle Fork Valley (including trees six feet or more in diameter) is along, and adjacent to the Middle Fork Wild and Scenic River corridor. However, the Sitka spruce forests are well-defended by rivers, creeks, wetlands, steep clay slopes, and devil's club so are difficult to access. The new WA DNR Oxbow Loop Trail provides good views into the heart of this forest type within the Wild and Scenic corridor.

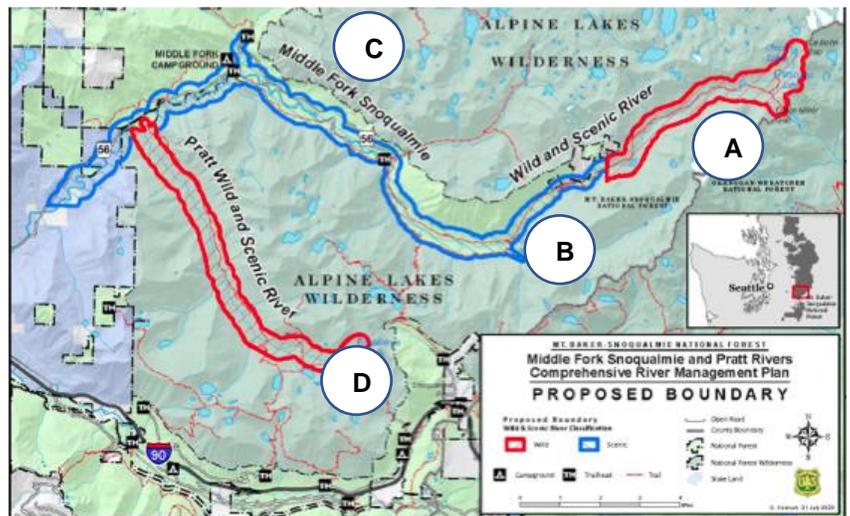
In 2015, Washington Department of Natural Resources completed a planning process for recently-acquired lands in the I-90 corridor (including those within the Middle Fork Valley), WA DNR botanists highlighted the Sitka spruce and associated plant communities:

"A number of distinctive vegetative communities can be found within the Recreation Planning Area. For example, the clay soils along the floor of the Middle Fork Snoqualmie River Valley support a unique forest community that includes Sitka spruce and western red cedar as well as hazelnut, Pacific crabapple, bitter cherry, and cascara." (WA DNR Snoqualmie Corridor Recreation Plan, page 59)

II. Support for Proposed Final Wild & Scenic River Boundaries for the Middle Fork Snoqualmie and Pratt Rivers

We appreciate the careful consideration towards what will be the final Wild and Scenic River boundaries for the designated sections of both the Middle Fork Snoqualmie and Pratt Rivers. We support the following proposals in the draft management plan:

- A. Inclusion of the entirety of the headwaters from Chain Lakes at La Bohn Gap along the ridgeline to Dutch Miller Gap within the Wild classification of the Middle Fork Snoqualmie Wild and Scenic River.
- B. A slight adjustment of the scenic section of the Wild and Scenic River boundary along the southern shore of the Middle fork Snoqualmie River to match the existing Alpine Lakes Wilderness Boundary. This boundary is set in a manner that provides for the protection and enhancement of the outstandingly remarkable value for recreation.



Many of our organizations worked for years with Evergreen Mountain Bike Alliance with the intent of excluding the Middle Fork Trail from Wilderness designation to allow for the continued use of that popular trail for mountain bike use outside of Wilderness. While mountain biking is a non-conforming use within Wilderness, it is compatible within a Wild and Scenic River designation and contributes to the outstandingly remarkable value for recreation. The Wilderness boundary was set back approximately 300 feet south of the trail alignment to allow for trail reroutes (which has already been utilized at least once). In addition to providing consistency with the outstandingly remarkable value for recreation, this adjustment fulfills Congressional intent of negotiations with the mountain bike community to ensure that mountain bike use on the Middle Fork Snoqualmie Trail will continue to be protected and enhanced consistent with Section 10a of the Wild and Scenic Rivers Act.

- C. The extension of the Wild and Scenic River boundary on the north side of the Middle Fork Snoqualmie River to include the Taylor River for approximately 1.25 river miles with a 1/8 mile offset on both sides of the river. We support the inclusion of the lower Taylor River as a tributary because of its importance in contributing to the water quality, fish, and recreational river outstandingly remarkable values of the Middle Fork Snoqualmie.
- D. The inclusion of Lower and Upper Melakwa Lakes which recognizes the importance of water quality in Melakwa Lakes in contributing to the outstandingly remarkable values for the Pratt River.

III. Support for the Dispersed Camping Closure along the Middle Fork Road

We strongly support the draft plan’s proposal to close dispersed camping within ¼ mile of the Middle Fork Snoqualmie Road (FS RD #5600) from the Forest Service boundary to the junction with Forest Service Road #5640 and continuing up FS RD #5640 to the Snoqualmie Lake Trailhead (#1002).

While we recognize that dispersed camping is an activity that is popular with those that utilize it, the impacts of this use are significant and increasing as the popularity of this corridor for recreation continues to increase. Impacts include the presence of unburied human waste, user-built trail networks, riparian river damage, and unsafe use of campfires. Dispersed camping is not sustainable in this location as noted in the Draft Plan:

“The 2017 dispersed campsite inventory identified 49 roadside dispersed campsites in this section. Concentrated use at heavily-used dispersed campsites raises concerns about water quality and fish habitat due to lack of sanitation facilities and impacts to riparian vegetation and streambank erosion. User conflicts have been reported where dispersed camping occurs at sites that would otherwise be used for river access. Over half of the sites contained evidence of human waste and all but one campsite was within 200 feet of the river.” (Draft Plan Pg. 46)

We concur with the recommended action to close this corridor to dispersed camping to protect restoration and management investments made since 2002 with support from community groups like the MidFORC coalition and Mountains to Sound Greenway. Most recently, this includes the rehabilitation and conversion to day-use picnic areas, with new toilet facilities, of two former dispersed camping areas and the development of the Camp Brown day use area, a new ADA-accessible trail and the new Garfield Ledges Trailhead resulting in the rehabilitation and removal of approximately 14 dispersed campsites.

Additionally, for the same reasons relevant to the recommended dispersed camping closure in the Draft Plan, we urge the agency to consider extending the closure upstream from the junction of FS RD #5600/5640 (at Garfield Ledges Trailhead) for at least 1.5 additional miles on NF RD 5600 to include all of Hell Hill and to include the old Taylor River campground. Dispersed campsites at the top of Hell Hill pose a great health risk, with human waste directed over the edge of the hill onto the clay slope that leads toward the Taylor River. Camping in the area around the old Taylor River campground has left a forest floor generally devoid of vegetation. There is no outhouse, so human waste can easily wash into the river or surrounding wetlands. Campsites out of sight of the road have been found smoldering – at one location, the entire perimeter of a campsite was on fire, and Forest Service personnel had to be called in to extinguish it.

IV. Evaluate and Uphold the 2005 Middle Fork Snoqualmie Watershed Access Travel Management Plan

While no longer part of the National Forest road system, this section of the Dutch Miller Gap Trail (approximately 8.5 miles) upstream of Dingford Creek occupies the former NFS Road 56 roadbed and still provides motorized access for authorized individuals including private landowners and individuals with active mining claims.

This stretch of road was removed from the NFS Road system and designated as a trail after a long, thorough Middle Fork Access and Travel Management (ATM) process beginning in 2002. A revised EA was released in 2005 and received 543 comment letters, 515 of which supported the preferred alternative, which included the road to trail conversion. The significant support for the proposal centered around the interest in protecting the river corridor and creating an easy riverside trail opportunity.

As part of the final plan, inholders were granted an easement and key access beyond a locked gate that allows vehicular access “to their properties ... for as long as the property served is used in its current use.” Inholders were required to perform routine maintenance on the old road prism and meet annually with the Forest Service to review maintenance needs with major repairs requiring analysis and approval from the Forest Service. The agreement requires inholders and Forest Service staff to meet annually to review maintenance plans. It is expected that the Forest Service will conduct regular, periodic meetings to ensure that all procedures pertaining to key use will be strictly adhered to.

To protect the corridor and honor past agreements relevant to this landscape, the CRMP must ensure that all 2005 ATM requirements for in-holder vehicle access are monitored and followed. This plan presents an important opportunity to integrate the requirements set forth in the 2005 ATM.

V. Support for the Proposed Management Direction for the Wild and Scenic River Corridor

We strongly support the development of the new management area (M-28) as generally proposed in the CRMP and applied to the management of the designated Wild and Scenic River corridors and reaches of the Middle Fork Snoqualmie and Pratt Rivers. While there is broader national guidance on management of Wild and Scenic Rivers, we recognize that the original (and current) Forest Plan did not include a management area specific to designated Wild and Scenic Rivers, only recommended Wild and Scenic River management areas.

We agree with the direction included in Desired Future Conditions, Standards, Guidelines and Suitability of Lands documented in the draft plan (Pg. 20 –23). This direction is consistent with existing guidance on Wild and Scenic Rivers and appropriate for the two river corridors in question.

Conclusion

Thank you for the opportunity to provide input on this draft management plan. With consideration for the aforementioned suggestions and comments, we look forward to its adoption and implementation to protect and manage this remarkable river system for the benefit of fish and wildlife, clean water, sustainable recreation opportunities and upholding tribal treaty rights and lifeways for generations to come.

Sincerely,

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