



June 1, 2018

Martie Schramm, District Ranger  
Snoqualmie Ranger District  
902 SE North Bend Way  
North Bend, WA 98045

## **Re.: Snoquera Landscape Analysis Project - Scoping**

Dear Ranger Schramm,

As recreation and conservation organizations with members who live, work, play and care deeply for Washington state's natural beauty, we wanted to take this opportunity and provide comments with regards to activities proposed in the Snoquera area of the Mt. Baker-Snoqualmie National Forest.

Several of us have participated in the conversations you have had with stakeholders, community members, tribal members and others and appreciate your efforts (and those of your staff) to listen and incorporate feedback. We encourage you to keep the communication channels open as you move into the next steps of the process.

### **Our Values and Snoquera Project**

All of our organizations support outdoor experiences on public lands while also ensuring these wild lands and waters are restored and protected. The types of activities we hope to see across this landscape should meet the goals of enhanced recreation for locals and visitors alike while also protecting habitat for salmon and other wildlife, preserving safe and clean drinking water and restoring landscapes where needed. We do not believe these are mutually exclusive goals. This is a large landscape with many needs and opportunities and we strongly encourage you to do this well. This may be the one chance in several decades, when a pathway forward is clearly outlined and benefits both people and wild lands/waters. We urge and support you in making the Snoquera project the best that it can be.

In the spirit of scoping, the following are issues and considerations that should be addressed as part of this project:

#### **1. Use Best Available Science**

The Mt. Baker-Snoqualmie National Forest has skilled professional staff in areas such as aquatics, soil science, recreation, wildlife, etc. They have access to a wealth of information and science with respect to what it takes to put this landscape on a path to develop into a resilient ecosystem. For example, when "heavy thinning areas would be used to emphasize large tree growing space" (Scoping Notice, p. 7) we would expect to see, in the draft Environmental Assessment, the science used to support these activities, along with other activities. Another example is on p. 13 where transportation system improvements are proposed to restore aquatic conditions. We understand that your aquatics team has done significant study and analysis in this area and we would expect to see that information not only outlined in the draft Environmental Assessment but also used to develop actions that clearly lead to improved aquatic conditions. Salmon recovery groups, tribes, the Environmental Protection Agency (EPA), state agencies all have substantial scientific information for

this area that should also be incorporated into your own knowledge bank to build a solid foundation that leads to improvements across the landscape.

## 2. Enhance Recreation Opportunities and Infrastructure

As we have commented in the past, the Snoquera landscape is an amazing area located adjacent to Mt. Rainier National Park, containing two wilderness areas and vibrant rivers. It also has numerous recreation opportunities including trails, campgrounds, a ski area and access to historic lookouts. Washington's recreational visits are only growing with at least 63% of Washingtonians participating in outdoor activities each year. These recreationists spend \$21.6 billion annually on trips and equipment that support nearly 200,000 jobs<sup>1</sup>. There is a real opportunity to enhance recreational experiences for visitors in this area by thoughtful planning, improvement projects and dedicated partnerships. The Forest Service should look at focusing the limited recreation funding available on prioritizing access to established trailheads, campgrounds and other recreational infrastructure as well as access to new recreational opportunities to address demand. The recreation economy is now the largest economic contributor of National Forests in the United States and most certainly on the Mt. Baker-Snoqualmie National Forest (MBSNF), one of the most heavily visited forests in the country. A recent study by Earth Economics and The Wilderness Society shows that the MBSNF drives an \$80 million dollar recreation economy and that more than 75 percent of recreationists are from west of the Cascades. The study also shows that along the 410 corridor, an estimated \$13 million in spending occurs within local communities from MBSNF recreation.<sup>2</sup> The Snoquera area could serve as a model of how deliberate dedication to recreational improvements, which are also in balance with the ecosystem functions, can provide economic benefits to local communities.

We have a few comments regarding what is outlined so far in the scoping notice, related to recreation:

- Corral Pass – we are very happy to see that portions of Corral Pass road will be rehabilitated and that the campground will be reestablished. As we've noted on previous comments, this trail provides access to a wide-range of alpine vistas and wilderness experiences. We also encourage the addition of a vault toilet to handle the public use in this area.
- Dispersed camping – we appreciate opportunities for dispersed camping and also recognize that occasionally ill-conceived campsites can harm streams and important vegetation in riparian areas. We look forward to hearing more details about your proposed solutions in the draft Environmental Assessment.
- Road-to-trail opportunities – we are very happy to see that our previous comments (as part of the Lower Greenwater ATM) about this tool were incorporated. We know it is not applicable in every situation, but this can provide options for increasing or decreasing trail lengths for hikers or creating a bypass or creating a loop trail experience for equestrians.
- Recreational target shooting – we support a safe and focused approach to recreational target shooting in this area. With a wide-range of recreational users in this forest, we believe that everyone can access their recreational interests in a manner that is safe for each other and with minimal impacts to natural resources.
- Trails for the Future – As you noted, visitation to this landscape is high and will only grow as population increases. The Snoquera project is an opportunity to really plan for current and future uses. Some questions to consider: What quality are the existing trails in? Are there opportunities to reduce impacts to resources from particular trails while also increasing the quality and/or safety of the trails? Are there additional areas that can be identified to provide new recreational opportunities? Where will new trail users and campers go in the

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<sup>1</sup> Briceno, T., Schundler, G. 2015. Economic Analysis of Outdoor Recreation in Washington State. Earth Economics, Tacoma, WA.

<sup>2</sup> Mojica, J., Armistead, C, Briceno, T. 2018. Gem of the Emerald Corridor: Nature's Value in the Mt. Baker-Snoqualmie National Forest. Earth Economics, Tacoma, WA.

forest and are there places we can direct them now or in 5 years or 10 years? Where are there places to improve signage, with high-quality and informative signs, that enhance the users experience?

We believe this is the time and place to set the stage for current and future recreational use across this landscape that also minimizes harm to natural resources.

**3. Include “improvements to water quality with a focus on benefits to salmon and community drinking water systems and to address Total Maximum Daily Load (TMDL) requirements” as a “need” in the purpose/need for this action.**

As we’ve commented before, this area of the forest has several drinking water systems that source water from Forest Service streams. These include Crystal Mountain, the town of Buckley and the City of Tacoma. Tacoma Public Utilities (TPU) provides 59 million gallons of drinking water to 300,000 people in Pierce and South King counties. The 144,480 acres of lands in the upper watershed (37,000 of which are national forest lands) provide critical filtration services in the Green River Watershed, which means TPU’s drinking water requires minimal filtration.<sup>3</sup>

Tacoma and Buckley are identified on the land management allocation maps as “municipal watersheds”. Given that one of the origins of the Forest Service, that is often forgotten, is to protect long-term drinking water supplies, this is the time to do so. There may also be partnership opportunities with the Urban Waters program (in the Green River watershed) and funding opportunities from the Drinking Water Providers Partnership. The Buckley water system does appear to now be outside the scope of the project area yet they have expressed concerns with upstream management on Forest Service lands, especially with regards to the road system and sediment delivery. It is interesting to note that the scoping notice identifies commercial thinning activities in the upper reaches of the Green River watershed (Tacoma’s drinking water source) but does not identify particular drinking water protection and resilience measures. We encourage you to do so in the draft Environmental Assessment. There did appear to be some projects associated with the Silver Springs Water Association, which we hope will be beneficial to the community members over the long run.

As you are also aware, there are threatened and endangered fish runs that depend on the rivers and streams in this area (this is a Tier 1 watershed). According to the “Salmon Habitat Limiting Factors Report for the Puyallup River Basin, WRIA 10 (July 1999)” both the upper Puyallup and upper White River watersheds suffer from present and past timber harvest practices that reduce the ability for riparian areas to provide wood and shade to the river and stream channels and continue to contribute fine sediments from road construction and landslides.” Sediment inputs can be reduced with proper road maintenance, road stormproofing and road decommissioning. Studies completed by the USFS Rocky Mountain Research Station show that road removal reduced sediment production by 80% and road improvements reduced sediment by 60% on average<sup>4</sup>. Though past land management actions have impacted their habitat, there is ongoing work and investment to improve conditions for aquatic species. Future actions should not further harm these species or impact restoration investments made to date. We encourage you to incorporate the data that your fishery biologists, other partners, and the tribes have collected to help identify restoration actions that benefit these species. We expect to see in the draft Environmental Assessment how the activities/actions identified will specifically benefit these fish runs.

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<sup>3</sup> Mojica, 2018, p. 53.

<sup>4</sup> USDA Rocky Mountain Research Station. Science You Can Use Bulletin. March/April 2016. Issue 18.

There is also a TMDL in-place for the Greenwater river system. Actions that were agreed to in the development of the TMDL should be addressed in any project that moves forward in this area. The scoping notice made no mention of the TMDL.

#### **4. Clearly articulate and incorporate transportation system challenges and opportunities in the purpose/need statements.**

We are encouraged to see the recognition of roads and the transportation system as both a benefit and a liability to the national forest. We benefit from roads when we access trailheads, campsites, picnic areas and other sections of the forest. Yet we also are aware that there are redundant roads that are a liability: costly and causing harm to rivers, salmon and wildlife, such as elk. There are very few actions that can occur on the national forest without some road system, but that road system can be much more sustainable. The Sustainable Roads Strategy process included an analysis of the benefits, risks and even uniquely to the MBS – the social component of the road system. The Greenwater Access Travel Management Plan analyzed roads further and made decisions on road treatments for the Greenwater watershed. The Snoquera project should build off that information and decision and additional new information to outline steps for the road system. Where people use roads to access trailheads and campgrounds – those roads should be prioritized for maintenance. Where roads are unneeded and are causing resource damage, treatment should include decommissioning. Where roads are unneeded but an opportunity exists for additional recreation – these roads can be converted to trails. All while keeping in mind the ultimate objective of reducing risks to aquatics and terrestrial systems while enhancing benefits to road users who wish to have reliable access to places they enjoy.

We have a few comments regarding what is outlined so far in the scoping notice related to roads:

- We'd like to remind you of the road to Noble Knob/Dalles Ridge that should remain maintained as a ML3 but mistakenly got reduced to a ML2. One of the most popular hikes in the area is the Noble Knob which ranks in the Washington Trails Association's Top 100 most trip reported hikes. Noble Knob is a rare gem in that three trails lead to Noble Knob and provide access to incredible views of Mt. Rainier and the surrounding area with very little elevation gain (200 ft from Corral Pass Trailhead and 500 ft from Dalles Ridge Trailhead), making these trails family-friendly and accessible for a variety of trail users.
- We expect to see one purpose of this action to be identification of the minimum road system, in compliance with Subpart A of the Travel Management Rule.
- Daylighting – The Forest Service proposes “daylighting” forest roads but more information is needed. What is the intended outcome of this action – road maintenance, scenic views or other? Which roads will be proposed for the “daylighting” process? What are the sideboards for this? How deep into the forest along roadways will trees be harvested? How much daylighting needs to occur to achieve the objectives of less road maintenance? A major problem with this approach is that it address the natural environment (trees) as if it were the problem, not the roads or unmaintained or under-sized culverts. We expect that the draft Environmental Assessment will provide more detail on how much of this additional logging will improve roads in contrast to other specific environmental and economic road-related actions.
- We suggest that maps and accompanying tables and text clearly articulate the current condition of a road (especially if currently closed due to factors such as storm damage), whether the Greenwater ATM made a decision on the road, what future maintenance level that road will have and where temporary roads are needed. With nearly 500 miles of road in this area, there are many opportunities to outline a sustainable road system. It appears that there are 50 miles of temporary roads that could be developed – which is an additional 10% of the current road system. This should be seriously re-considered.

- Consider using the Geomorphic Roads Analysis and Inventory Package lite (GRAIP) developed by the Rocky Mountain Research Station to identify the key areas that contribute the highest amount of sediment to a waterway to ensure the treatments are targeted to where the greatest benefit can be achieved.
- 7222 Connector Road – We appreciate the thinking behind the development of a connector road, in particular because it appears to reduce a safety hazard (landslide risk) and improve aquatic conditions through decommissioning another section of road. We look forward to understanding the connector road a little better. The map on page 12 does not indicate a trailhead or a recreation site at the end of FSR 7224, so why is this connector needed? Is that last 10,000 feet of FSR 7224 through the LSR section needed for something not identified on the map? Or is this a place that could be considered for a road/trail conversion? We would like more detailed information about the connector road.
- We support many of the activities proposed on page 13 that will stormproof needed roads and improve conditions for salmon and water quality. However, there is a wide range of options – for example between 15-26 aquatic organism passage sites. We expect the Forest Service to use best available science to determine which options are most beneficial to aquatic resources and for this to be clearly explained in the draft Environmental Assessment.

#### **5. Incorporate an assessment and valuation of ecosystem services to inform management direction and activities proposed in this landscape.**

This is a very large project area – encompassing over 190,000 acres. It will take many, many years for the proposed activities to be implemented. In that time, we will continue to see changes on the landscape due to population demands and climate change. According to the 2012 Forest Service Planning Rule, the agency must complete an assessment of ecosystem services—that is, the benefits people obtain from the national forest (36 CFR 219.6(b)(7))—along with a variety of other resource conditions and uses. This seems like a critical time to fully incorporate and enhance the ecosystem services that bring tremendous unaccounted value to this area and pave the way for future planning efforts at the forest-wide scale.

Communities rely on goods and services to survive and thrive. Yet many of those services come from healthy ecosystems and are not valued or counted. When these assets are ignored, the true costs of ecosystem degradation are compounded. Accounting for these services from the beginning can lead to better decision-making, particularly as a variety of activities are considered that may or may not directly and indirectly contribute to the well-being of community members.

A recent report<sup>5</sup> quantifies the ecosystem services for the entirety of the MBSNF as well as the national forest lands in the Green-Duwamish/White-Puyallup landscape. Relevant findings from that study include:

- The forests and wetlands of the headwaters regulate flows and limit flood potential in the lower Green-Duwamish, with wetlands providing up to \$3,500 per acre per year in flood-risk reduction.
- The headwater forest ecosystems of the Green-Duwamish within the MBNSF contribute as much as \$712 million each year. When regarded as an asset, the provisioning of water-related ecosystem services in this landscape are valued up to \$23 billion.
- The annual value of the 40 miles of stream stewardship in the Upper White River is estimated at \$137,400 which translates to an asset value of \$4.7 million.
- Along the 410 corridor, an estimated \$13 million in spending occurs within the local community from MBSNF recreation.

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<sup>5</sup> Mojica, 2018.

This report clearly highlights the economic value of clean water, habitat, disaster risk reduction and recreation in this area. These are not mutually exclusive goals and we believe your scoping notice highlights that the Mt. Baker-Snoqualmie National Forest is on the right track. We encourage your thinking, analysis and implementation in this area because it is not only monetarily critical now but will be even more so in the future.

#### **6. Additional questions.**

We had a few additional questions that we look forward to learning more about, namely:

- Are any of the thinning projects being considered as stewardship projects? This could bring in much needed funding for some of the recreation projects proposed. If not, we'd like an explanation why not.
- Thinning in and near riparian areas can be problematic. Please further define the cut buffers or skips in these areas and where you will not cut.
- Please provide more information on the firewood opportunities. Will the Forest Service designate areas where anyone may cut? If so, how will this be monitored? Or will the Forest Service cut and fall trees, using in-house teams, and then community members may then gather the fallen trees?
- Connecting habitat is a critical service that national forest lands provide. Particularly when the lands lead into a national park. We expect to see some further analysis and incorporation of habitat corridors and connectivity outlined in the next step of this project.

Snoquera contains multiple watersheds that drain into Puget Sound. The area is beloved as a regional recreational asset. Threatened and endangered salmon and trout still struggle to spawn in upper river reaches. And millions of people in urban and rural areas depend on clean drinking water that flows through this landscape. There is tremendous opportunity to protect and restore Snoquera and we appreciate your efforts to do so.

Thank you for offering this opportunity to incorporate our input in the scoping process. As always, we are available to meet and discuss further.

Sincerely,

Marlies Wierenga,  
Pacific Northwest Conservation Manager  
WildEarth Guardians

Tom Uniack  
Executive Director  
Washington Wild

Andrea Imler  
Advocacy Director  
Washington Trails Association

Kitty Craig  
WA State Deputy Director  
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