October 30, 2018

Yewah Lau

Hood Canal District Ranger

℅ Kim Crider

1835 Black Lake Blvd. SW

Olympia, WA 98512

Dear District Ranger Lau:

Thank you for the opportunity to comment on the Wynoochee Restoration and Road Management Project. Washington Trails Association has a 50-year legacy of engaging the hiking community. WTA enhances hiking experiences in Washington state by empowering a diverse and growing community of hikers to explore, steward and protect trails and public lands. WTA is the nation’s largest state-based trail advocacy organization, with 15,500 member households, thousands of volunteers each year and an online community of more than 100,000.

This project to preserve the long-term health of the terrestrial, riparian and aquatic habitat of this area is a commendable effort to acknowledge the interests of those who recreate outdoors, and restore fishery habitats.

Our organizations believe that healthy, thriving forests are an important component of high-quality recreation experiences. We understand and support the need to improve forest health and reduce aquatic risks associated with certain roads. We also believe that the Wynoochee is an important recreation area, which supports the economic vitality of nearby communities, including Montesano and the greater Grays Harbor County. After review of this project, we offer recommendations to:

* Lessen impacts to recreation trails due to proposed thinning projects
* Maintain road access to recreation opportunities

**Lessen impacts to recreation trails due to proposed thinning projects**

The scoping notice proposes a substantial amount of thinning units within the project area with direct impacts to popular recreation areas and trails. While one of the goals of the project is to reduce crowding of trees in second-growth stands and contribute to the economic viability of local communities, many of these proposed thinning units will have direct impact to trails and popular outdoor recreation areas.

We are concerned the experience sought by hikers, trail runners and others will be negatively impacted for a generation of recreationists. Efforts should be made to ensure that the planned activities in thinning units adjacent to the Wynoochee Lake Shore Trail and the Coho campground (including, H19, H27, H30, H40, H66, H70, H76, H77, E220) do not negatively impact the recreational quality and maintain the high visual quality of this landscape.

Furthermore, we are concerned with proposed thinning units H7, H13, H30, H43, H44, H53, H55 and H56, as these units directly overlap with the Wynoochee Lake Shore Trail as indicated on the map of proposed thinning units included with the scoping notice. The Wynoochee Lake Shore Trail is a designated National Recreation Trail[[1]](#footnote-1). Informational signage indicating this information are present at the main lakeshore access points as well. Given 2018 is the 50th anniversary of the National Trail System Act which provided the National Recreation Trail Designation, every effort to protect this trail from negative impacts should be made. The legislation, according to the National Park Service, “promotes the enjoyment and appreciation of trails while encouraging greater public access.” The proposed thinning in these units will not only impact the recreation experience for a generation of users, but will limit public access to the outdoors during the actual logging.

We recommend that the Forest Service remove or shrink the units identified above (H7, H13, H30, H43, H44, H53, H55 and H56) as these units directly overlap with the Wynoochee Lake Shore Trail given their popularity, national recognition and high level of sustained recreational use.

We are concerned with the following proposed units, which will impact recreation opportunities within the project area:

* F95 and F101, which impacts the Wynoochee Lake Shore-Maidenhair Falls Trailhead. This site is also indicated as a potential rock source for road work.
* F94 due to its proximity to Maidenhair Falls.

We also offer the following recommendations to ensure users are informed about upcoming project efforts and that recreation impacts are minimized during peak use season:

* Set windows for trail closures based on highest use periods and trail access periods.
* Avoid closing trails and trailheads during the peak season.
* Schedule harvest so that no more than one trail is closed at one time. Closures should be for a specific time period that does not expand between operating seasons - all activities need to be completed during the set closure time, including necessary restoration work.

**Maintain road access to recreation opportunities**

The scoping notice also proposes a substantial amount of roads and restoration projects throughout the project management area. Many of the roads included in the proposed action act as access points for outdoor recreation opportunities, or change the maintenance level to effectively limit those who have the ability to access certain areas. The following are proposed changes we recommend the maintenance levels retained:

* 2270-400, which provides access to the currently moved Wynoochee Pass Trailhead. Please retain this road as ML2.
* 2275-100, which provides access from the south to the Wynoochee Lake Shore - Maidenhair Falls trailhead. Please retain this road as ML2.

We appreciate the inclusion of the following roads as proposed without change, due to their recreation value:

* 2371-200, which provides access to Weatherwax Ridge and its accompanying lookout.
* 2372-040, which provides access to Anderson Butte.

**We are particularly concerned with the possible change in maintenance to road 2270 from ML3 to ML2.** The Olympic National Forest Forest-wide Travel Analysis Report[[2]](#footnote-2) from 2015 indicates that “Access Need for Recreation” is the second highest priority to guide road analysis after “Access Need for Legal and Administrative Uses.” Appendix H of this report, “Access Needs and Risk”[[3]](#footnote-3), indicates that road 2270’s current objective maintenance level is that of an ML2 road, however the road is categorized currently as an ML3. A possible maintenance level downgrade from ML3 to ML2 will likely result in the objective maintenance level decreasing lower than its current levels. If this road is maintained at anything less than an ML2, recreation access will likely be severely impacted as road 2270 serves as an important main stem to access recreation opportunities on the east side of Wynoochee including the Wynoochee Pass Trailhead. **We request this road’s maintenance level is retained as an ML3 and that future maintenance efforts ensure this road is objectively maintained as an ML3.**

Other recommendations with regards to proposed roads and restoration projects include:

* Creating safety pullouts, created where closed temporary and spur roads reach a mainline, with room for a turnaround.

**Other Comments**

Our organizations provide further aspects to consider while developing an Environmental Assessment (EA) for this project:

* As noted above, the Wynoochee is a popular recreation area. Please provide further information about direct and visual impacts to recreation that will be incurred as part of this project. The scoping
* Given the popularity of this area with recreationists of all kinds from nearby communities like Grays Harbor, we highly recommend that the Forest Service develop a public outreach plan that includes field trips, open houses, newsletters and other updates to keep recreationists informed about this process.

**Conclusion**

We are excited at the Forest Service’s efforts to maintain the Wynoochee’s aquatic, terrestrial, riparian and forest health through the long-term. Our local and regional economies will benefit from these efforts to create a healthy forest with vibrant outdoor recreation opportunities. Maintaining key road access including road 2270 to the Wynoochee Pass Trailhead, and minimizing trail impacts from thinning including those on the Wynoochee Lake Shore Trail are vital to sustaining outdoor recreation use within these areas. We look forward to contributing to this project as it moves forward.

Sincerely,



Andrea Imler

Advocacy Director

1. https://natrectrails.maps.arcgis.com/apps/webappviewer/index.html?id=8a6cd24d0ef04b2cb40a35e059b2b068 [↑](#footnote-ref-1)
2. https://www.fs.usda.gov/Internet/FSE\_DOCUMENTS/fseprd486361.pdf [↑](#footnote-ref-2)
3. https://www.fs.usda.gov/Internet/FSE\_DOCUMENTS/fseprd486365.pdf [↑](#footnote-ref-3)