



Cesar Ramirez, Acting District Ranger  
Naches Ranger District  
10237 Highway 12  
Naches, WA 98937

RE: The Pacific Crest Trail Association's comment on Draft Environmental Assessment, White Pass Ski Area – 2017 Projects

Dear Cesar Ramirez:

I am writing on behalf of the more than 13,500 members of the Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership is the 1968 National Trails System Act. It is the PCTA's role to work with the Forest Service to ensure the best possible management of the PCT and the experience it affords trail users, year-round, and to engage the public in its preservation. In 2014, PCTA provided comments to the scoping for this project. We noted that the PCT is continually faced by development pressures, and the proposed expansion of the Nordic trail system would create additional impacts on the scenic trail corridor. Over the last few years, PCTA has stayed engaged with this project. I spoke with Sue Ranger about the potential impacts to the PCT in 2019 and visited the proposed trail additions with Kevin McCarthy, General Manager of White Pass, in January of 2020. PCTA has expressed support for this project throughout this NEPA process, but I am writing to continue to emphasize the need to protect the unique character of the Pacific Crest National Scenic Trail.

PCTA appreciates several elements included in the Draft EA. Project design criteria "REC-1" addresses our concern that the new Nordic trail corridor could increase the volume of illegal mountain bike use of the PCT. By scattering slash along the new Nordic trail segment, the risk of inappropriate mechanized use of the PCT can be reduced. Thank you for including this requirement. Similarly, "REC-2" contains necessary language. It states that "The Nordic trail crossing of the PCT would be at oblique angle to make both trails less apparent to the other". This requirement will help maintain the high visual quality of the PCT by minimizing PCT users' ability to see down the impacted ski trail corridor. We appreciate the inclusion of this vital requirement because the new ski trail will create a corridor of cut trees up to 40 feet wide. The falling of large amounts of timber will create a noticeable visual impact.

During my site visit in January, I was assured by White Pass staff that great care would be taken to reduce the visibility of the cleared ski trail corridor. PCTA believes that through careful layout of the trail crossing, the new junction can be made to look to a casual observer like a naturally occurring clearing. The White Pass staff committed to this goal. I appreciate their partnership and the Forest Service commitment to the scenic quality of the PCT. Based on my conversations with Kevin McCarthy, I sent an email to District Ranger Kelly Lawrence in January 2020, that affirmed PCTA's continued support for this project. In addition to the assurances we received of careful construction of the trail crossing, PCTA also appreciates the requirement for "over-locking canopy" throughout the new trail Nordic trail system. This design feature will prevent the expanded trail system from being evident to PCT users at viewpoints south of Highway 12. Lastly, PCTA is glad that the proposed action does not include any grading of the new Nordic trail in the vicinity of the PCT.



PCTA emphasized in our 2014 comment letter that the existing ski trail approximately two tenths of a mile south of the proposed trail segment has a road-like character. This junction and other nearby road crossings negatively affect users' experience of the trail. The cumulative impact of these other crossings speaks to the need to carefully implement this project. The National Trails System Act states in Section 7(c), "Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail may be permitted by the Secretary charged with the administration of the trail." We must work together to carefully implement this project so that we protect the unique scenic character of the PCT and allow the public outstanding journeys along its route.

With the proper management of the trail in mind, PCTA has two requests for the construction phase of this project. One, we ask that a member of our staff be invited to participate in flagging the trail crossing prior to construction. PCTA staff have technical expertise in national scenic trail management and have been invested in supporting this project for many years. Secondly, we ask that the work in the vicinity of the PCT be scheduled to avoid the busiest months of the year on the PCT. The Draft EA calls for this project to be executed in the summer and fall. Thousands of PCT users pass through this section of the PCT during those prime hiking months. The summer is the busy season for local users to enjoy the William O'Douglas Wilderness via the PCT. The fall traditionally features the arrival of large numbers of long-distance hikers travelling along the PCT from the Mexican border. It would be advantageous for the clearing work in the immediate vicinity of the PCT to be scheduled to avoid these periods of high use. Falling operations near the PCT could be scheduled in the window after the end of ski season but before snow melts at higher elevations and the summer hiking season begins. Alternatively, it could take place in the late fall.

I appreciate your attention to these matters and the district's commitment to the needs of the Pacific Crest National Scenic Trail. Please contact me if you would like to discuss any aspect of this letter. I look forward to working with you further on this project.

Sincerely,

A handwritten signature in blue ink that reads "Michael DeCramer". The signature is written in a cursive style with a large, stylized "M" and "D".

Michael DeCramer  
PCTA North Cascades Regional Representative

CC:

Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator

Justin Kooyman, PCTA, Associate Director of Trail Operations