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Organization: Pacific Crest Trail Association
Title: North Cascades Regional Representative

Comments: October 27, 2021

District Ranger Aaron Stockon Naches Ranger District 10237 Highway 12 Naches, WA 98937

RE: White Pass Amendment #2 Lodge Expansion Projects

Dear Aaron Stockon:

Thank you for the opportunity to comment on the White Pass expansion projects. 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 rooted in 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. I have reviewed the White Pass Lodge Improvement Projects scoping letter, and we would like to take this opportunity to highlight the presence of the Pacific Crest National Scenic Trail in the project area.

The PCT and the White Pass Company's special use permit area share the same stunning landscape. The Naches Ranger District and PCTA have worked with the White Pass Company over the years to minimize user conflicts between the year-round recreation on the congressionally designated PCT and the many thousands of Washingtonians who utilize the White Pass Ski Area. Prior to the 2010 expansion of the White Pass Resort into Paradise Basin, PCTA worked with the Forest Service and the White Pass Company to relocate the PCT away from the new Basin Quad chairlift and retain a more natural appearance to the PCT corridor. This relocation benefited the White Pass Company. It moved winter recreation on the PCT away from popular downhill runs. During the recent Nordic ski trail expansion, PCTA worked with the Forest Service and White Pass Company to minimize the visual impact of a new groomed crossing of the PCT on the north side of Highway 12.

PCTA has confidence that with careful attention to project implementation, the White Pass Company can grow its facilities while respecting the character of the surrounding resources, including the PCT. PCTA appreciates that the proposed expansions are located near existing facilities and are designed to harmonize with the existing structures and respect the special qualities of the area. The High Camp Lodge is of particular interest to PCTA because it is located less than 400 meters from the PCT and is in an Inventoried Roadless Area. Based on our viewshed analysis, PCTA staff have concluded that the enlarged High Camp Lodge will be visible from points along the PCT. However, it seems likely that the expanded structure will not substantially interfere with the scenic quality of the affected portions of the PCT because the profile of the enlarged lodge will not significantly change. The High Camp Lodge is located in an area with a Visual Quality Objective of Retention. As such, the design of the expanded structure must harmonize with the form, line, color and texture of the landscape. As the planning for this expanded lodge moves forward PCTA asks that continued attention be given to visual resources of the basin. PCTA was pleased to see language in the scoping document that assured the public that expanding High Camp Lodge will not affect the roadless nature of the area.

Both the PCT and the Inventoried Roadless Area are resource conditions that warrant careful consideration in

planning processes. In this case, PCTA feels that the proposed projects can be implemented in a manner that does not negatively affect either extraordinary resource. PCTA is very interested in the White Pass area. Please keep our staff informed as this project progresses.

Sincerely,

Michael DeCramer
PCTA North Cascades Regional Representative

CC:

Lindsey Steinwachs - PCT Program Administrator, USFS Justin Kooyman - PCTA Associate Director of Trail Operations