Lower Pratt River Trail Reconstruction and Partial Relocation

Decision Notice and Finding Of No Significant Impact (FONSI)

USDA Forest Service
Mt. Baker-Snoqualmie National Forest
Snoqualmie Ranger District
King County, Washington
Sections 21, 22, 28, 29, 30, and 31 T. 24 N., R. 10 E., Willamette Meridian

The Snoqualmie Ranger District, Mt. Baker-Snoqualmie National Forest has completed the Environmental Assessment (EA) for the Lower Pratt River Trail Reconstruction and Partial Relocation project. Minor changes were made to the pre-decisional EA provided for public comment. These changes include: *1) Several mitigation measures and monitoring were updated in Chapter 2. 2) An alternative allowing mountain bikes on this trail was considered but eliminated from detailed study.* 3) *The visual resource analysis was updated. 4) The analysis for determining use of the trail was updated for clarification.* 5) *Due to updates in the preliminary EA, page numbers have changed from the document sent for the 30-day comment period. Though page numbers have changed, the content of the EA is unchanged, unless otherwise noted.* The EA is available at the North Bend office of the Snoqualmie Ranger District. The North Bend office is located at 902 SE North Bend Way, Building #1, North Bend, WA 98045. The EA is also available on the Internet at http://www.fs.fed.us/r6/mbs/projects/.

Decision

After reviewing the Lower Pratt River Trail Reconstruction and Partial Relocation EA, the Soils, Wildlife, Fish, and Botany Biological Evaluations, specialist reports, applicable forest plan direction, and public comments following the 30-day comment period, it is my decision to implement **Alternative 2.** This Alternative is hereafter called the "Selected Alternative."

This alternative is described in Chapter 2 of the EA, and compared with the other analyzed alternatives in Table 1 of the EA. A map of the Selected Alternative is in Appendix C below. Decision Notice, Appendix A, contains the Project Elements and Mitigation Measures that are integral parts of the Selected Alternative. This decision will implement reconstruction/construction of 3.25 miles of the Lower Pratt River Trail. Specifically: Approximately 1.30 miles of the original Lower Pratt River Trail will be reconstructed. To protect riparian habitat, approximately 0.95 miles of trail will be moved up and away

from the riparian reserves and the floodplain of the Middle Fork Snoqualmie River. Approximately 1.00 mile of trail will be constructed on abandoned railroad grade(s) or logging truck roads.

The first 0.10 mile of this trail is within "Late Successional Old-Growth" (LSOG). The remaining 3.15 miles of this trail is within "Late Successional Reserve" (LSR) and Riparian Reserves. Underlying these allocations is 5A-"Recommended Recreation Rivers" and 27-"Alpine Lakes Management Area" (Management Intensity-Scenic Forest).

Specifically my decision will implement:

- Within the first 1.25 miles of trail, approximately 0.95 mile of trail will be on the original trail-tread. The remaining 0.30 mile of trail will be moved up and away from the Middle Fork Snoqualmie River to better facilitate a trail crossing at Rainy Creek and an unnamed tributary and to move the trail further away from the floodplain of the Middle Fork. After crossing an intermittent stream, approximately .065 mile of trail will be constructed across the hillside until it reaches abandoned railroad grades and/or logging roads. From this point, the trail will be built on these old roads until it ties in with the original tread near the confluence of the Pratt and Middle Fork Rivers. The remaining 0.35 mile of trail reconstruction will be on the tread of the original Lower Pratt River Trail.

- It is estimated that within the first 1.40 miles of trail, approximately 0.80 mile of trail will be within Riparian Reserves of the Middle Fork, Rainy Creek, and or an unnamed intermittent tributary. The next 1.55 miles is outside of Riparian Reserves, and the remaining 0.30 mile is within the Riparian Reserve boundaries of either the Middle Fork and/or the Pratt River (2.15 miles of trail outside Riparian Reserves, 1.10 miles within Riparian Reserves).

- Two stream crossings on perennial streams will be required (Rainy Creek and an unnamed tributary). These crossings will utilize a log or steel stringer bridge or a low-water ford. The method of crossing will be determined during the trail design phase depending on the costs and logistics of installing each crossing.

My decision also includes:

- Implementation will also include designing a side-trail that will provide access to a popular gravel-bar along the Middle Fork Snoqualmie River. The side-trail location will be between Rainy Creek and the unnamed tributary at a point where the trail is closest to the river. This trail will be approximately 300 – 400 feet in length. Once this new trail is constructed, all user-built trails that access the river will be "storm-proofed" to lessen the potential for erosion and then these trails will be restored to natural riparian conditions.

- Several parallel user built trails have also developed over time within the first 1 – 1 ½ miles of the Lower Pratt River Trail. With the selected alternative, all of the user built trails will be rehabilitated.

- Implementation of the best management practices, constraints, and mitigation measures as listed in this Decision Notice (Appendix A, pp.33-36 of the EA).

Rationale for the Decision

I have selected Alternative 2 because it best meets the purpose and need (objectives) for the project as described on pages 7-10 of the EA and best responds to objectives (EA, Chapter 1, Need for Action). The

two objectives in the Need for Action are: 1) Provide for public safety; and 2) Reconstruct the Lower Pratt River Trail to a standard consistent with the Forest Plan as amended.

In particular, the Selected Alternative:

- Will provide for a safe route of access to 3.25 miles of Middle Fork Snoqualmie River as well as safe access to the entire lower Pratt River drainage. Currently, the only access to these areas is either from trailheads along the I-90 corridor, wade the Middle Fork Snoqualmie River, or trying to navigate through heavy brush for approximately 2 miles from the Middle Fork Trail Bridge to the Pratt River (EA pp. 7, 29-31, 50-54, 95-96).

- Will provide a safe access for Search and Rescue crews (SAR) when there is a need to search and locate lost hikers, skiers, snowshoe walkers, and others. This is especially true when weather conditions prohibit the use of aerial observation and rescue (EA, pp. 7 and 95-96).

- Will provide for enhanced recreation use by maintaining existing recreation opportunities as well as providing an opportunity for hiking and use that is currently not available to many forest users because the trail is currently inadequate (EA, pp. 3-5, 8-10, and 50-54).

- Will provide other recreation opportunities that are consistent with current land management direction and associated standards and guidelines (EA pp. 3-5, 16-18, 50-52).

- Will reduce surface erosion and improve water quality by eliminating user built trails while improving the trail tread on the inadequate trail thus managing water runoff (EA pp. 30-32 and 78).

- Will provide an additional hiking opportunity on a trail that is currently inadequate for hiker and equestrian use and that could take pressure off of trails adjacent to the I-90 corridor that enter the Alpine Lakes Wilderness (EA pp. 3-4, 8, 49-53, 88-91).

- Will be consistent within the “Middle Fork of the Snoqualmie River Valley River Corridor Public Use Concept, Phase II” (1997) Published by the “Mountains to Sound Greenway”) (EA pp. 9).

A detailed description of the Selected Alternative (Alternative 2) is found in Chapter 2 of the EA, with a Comparison of the Alternatives by Elements shown in Table 1. A map of the selected alternative is displayed in Figure 4 of the EA and Appendix C of this Decision Notice.

Other Alternatives Considered

Two other alternatives were considered in detail including “No Action” and “Reconstruct or Relocate for use by hikers only.”

Additionally, four alternatives were considered but not developed fully. The alternatives are: Rebuild the Trail all in the Original Location, Build Trails in Other Locations, Access the Pratt by Bridge over the Middle Fork, and Allow Mountain Bike use on the Lower Pratt River Trail. These alternatives and the reasons they were eliminated from detailed consideration are described in Chapter 2 of the EA (EA pp. 25-29).

I did not select Alternative 1 (No Action) because this alternative failed to achieve the project’s Purpose and Need, or Forest Plan goals and objectives (Chapter 1 of the EA). Specifically: 1) Alternative 1 would

not provide safe, direct access to the Pratt drainage from the Middle Fork River drainage because the trail in its current condition is inadequate for use. 2) Because of the inadequate condition of the lower portion of the Pratt River Trail, Alternative 1 would not provide for an adequate hiking opportunity that could take pressure off of trails adjacent to the I-90 corridor that enter the Alpine Lakes Wilderness. 3) Due to the lack of maintenance and absence of other portions of the lower trail (washed out), Alternative 1 would not provide an adequate trail at elevations where the ground is snow free for at least half of the year (Land and Resource Management Plan) (LMRP). 4) Alternative 1 would not provide for adequate hiker and interpretive trails near large campgrounds because portions of the lower Pratt River Trail from the Middle Fork Trailhead to the Pratt River drainage are inadequate for hiker and equestrian use (Middle Fork Campground) (LRMP).

I did not select Alternative 3 because this alternative, though providing access to the Pratt drainage, would only provide for use by one segment of the population while restricting use to other groups who have historically utilized the drainage infrastructure.

Through the 30-day comment period, several public respondents questioned why Mountain Bikes were not considered on this segment of trail. Based on these comments, an alternative that would allow bike use on the trail was considered but eliminated from detailed study (EA p. 25-29). Other than the use of Mountain Bikes, the Interdisciplinary (ID) Team and public comments did not identify other issues that would have led to development of an additional action alternative that would meet the project objectives (EA Chapter 1 and Appendix A).

Best Management Practices, Constraints, Mitigation Measures and Monitoring

My decision also includes the design features and mitigation measures specific to this project to avoid adverse effects on recreation, soils, streams, wildlife, cultural resources, air quality, and adjacent special-use permits activities, and for limiting the spread of noxious weeds. Descriptions of project elements and mitigation measures are provided in the EA on pages 33-36, and in Appendix A of this Decision Notice.

Forest Plan Consistency

I have reviewed the EA for the project including the environmental effects and Forest Plan Consistency sections for each affected resource (EA Chapter 3, EA page 15-17),and Appendix F). My decision to adopt Alternative 2 is consistent with the Mt. Baker-Snoqualmie National Forest Plan, including all plan amendments, in effect on the date of this decision (see EA p. 13 for major amendments). The action will not alter the multiple-use goals and objectives for long-term land and resource management.

My conclusion is based on a review of the Project Record that shows a thorough review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgment of incomplete or available information, scientific uncertainty, and risk. For example, the trail under consideration is inadequate for full use because portions of it have been washed out by flooding and it has not been maintained since the 1960’s (EA p. 1). Further, this trail is listed within the Forest Plan as an existing and viable trail (Forest Plan, Appendix-E, p. E-21). Currently there is disagreement between the

Forest Service and a few members of the public who have made comments both during scoping and the 30-day comment period contending the Lower Pratt River Trail does not currently exist.

Watershed Analysis: The project is within the Middle Fork Snoqualmie River watershed and it is designated as a Tier 2 watershed. The Middle Fork Snoqualmie River Watershed Analysis was completed in 1998 (EA, p. 16).

Riparian Reserves (EA pages 14, 15, and 75 - 78): My decision is consistent with Riparian Reserves standards and guidelines and Aquatic Conservation Strategy objectives. Originally, the trail was constructed in Riparian Reserves; however, with the selected alternative much of the trail will be moved out of the Riparian Reserves for the Middle Fork Snoqualmie River (EA, p. 78). The Selected Alternative reconstructs or partially relocates approximately 1.50 miles of trail within Riparian Reserves while 1.75 miles is outside. Activities that will occur within Riparian Reserves include trail reconstruction and partial relocation; all user built trails will be eliminated and "storm-proofed;" and bare soils are to be seeded and mulched. To minimize erosion and soil transport, trail design techniques will emphasize structures, outsloping, "crowning," and reducing the slope of the trail tread (EA p. 78).

The only vegetation clearing that will occur will extend approximately 4 feet on either side of the trail center (refer to alternative descriptions). Given the small amount of clearing, effects to Riparian Reserves will be small to non-existent and not measurable since there will be no effects to species that utilize Riparian Reserves (EA p. 78 and wildlife and fisheries analysis pp. 61-74).

Late Successional Old-Growth (LSOG), Late Successional Reserve (LSR), MA 5A – Recommended Recreation Rivers, MA 27-Alpine Lakes Management Area, Scenic Forest (SF) (EA page 13): *All LSOG 1and LSOG 2 are Late Successional Reserve (EA p. 14). Underlying the LSR allocation is MA 5A and MA 27(EA p. 14).*

LSR: The project is within LSR 122 which is approximately 16,734 acres in size. The entire trail would pass through mid-seral and early seral stands of timber with scattered remnants of old-growth (LSR Assessment, p. 48). Reconstruction/Relocation of this trail will be neutral, therefore consistent with the LSR Standards and Guidelines (EA pp. 62-63). This is because clearing along the trail will only involve mainly removing brush and cutting saplings; thus Alternative 2 will maintain current forest structure (LSR habitat) (ROD p C-16).

Recreation Rivers (Under the Wild and Scenic Rivers Act): The outstandingly remarkable values for both the Middle Fork and Pratt Rivers include:

<u>Recreation:</u> Implementation enhances this value because it provides a recreation opportunity consistent with the definition of: *"The area provides a diversity of high quality recreation opportunities…,"* (EA p. 97).

<u>Fish:</u> Implementation would have no change to any factors that were originally found in the area for this value. Further, the possibility of sediment reaching the rivers is reduced by rehabilitation of user built trails (EA p. 98).

Wildlife: Following implementation, grizzly bear core habitat would be above the 1997 baseline level. Further, no wildlife habitat will be removed nor would wildlife habitat be measurably affected (EA pp. 61-67 and 98).

Geologic: There are no apparent geologic factors in or immediately adjacent to the project area; thus, no geologic features would be affected (EA p. 98).

Ecological: There are no known Federally Endangered or Threatened plant species (EA pp. 81-83). Two plant species may be affected but disturbance can be eliminated through a botanist marking the locations and avoidance during reconstruction (EA p. 98-100).

Scenic Forest (SF): The Pratt and Snoqualmie Rivers are recommended under the Wild and Scenic Rivers act with the classification of "Recreation" with a sensitivity level of "1." Under this level, the visual quality objective (VQO) for the foreground is "Retention" with "Partial Retention" in the middle ground and back ground. Implementation of the selected Alternative will meet the VQO's of Retention and Partial Retention because the trail is not visible from river banks, Forest Road 56, or from trails or viewpoints from the Alpine Lakes Wilderness due to vegetation and terrain. The only portion of trail that is currently visible to the casual observer is at the Middle Fork Bridge (at the beginning of the trail). The implementation of Alternative 2 will provide crossings on two tributary streams. Rregardless of the type of crossing structure, these too would not be visible from any viewpoints along the river(s), Forest Road 56, or from the wilderness (EA pp. 86-87).

How My Decision Addresses the Issues

Issue 1: Potential Conflicts between User Groups.

The original trail was all within the Riparian Reserve land allocation but with the selected Alternative, approximately 1.75 miles of trail will be moved out of Riparian Reserves. Further, it is anticipated that conflicts between users will be rare or nonexistent. This is because survey data that has been collected in 1999 and 2006 indicates that less than 1% of the trail users have pack animals. Lastly, this alternative does not include a provision for using mountain bikes (EA pp. 21-23, 29-31, 41-48, and 75-78).

Issue 2: Potential Effects to Wildlife and Their Habitats

The Selected Alternative will maintain the overall core habitat for grizzly bear within BMU #01 above the 1997 baseline levels (there will be no net loss of habitat).No suitable habitat for the spotted owl or marbled murrelet will be removed or modified. However, the effects determination for spotted owl and marbled murrelet is "Likely to Adversely Affect" for noise. To mitigate affects from noise, standard management practice restrictions will be implemented when project work begins. The selected alternative will have "no effect" on spotted owl or murrelet critical habitat (EA pp. 22, 36, and 63-66).

Issue 3 Potential Effects to Riparian Reserves

The original trail was entirely within Riparian Reserves. The selected alternative will relocate approximately 1.75 miles of trail out of the Riparian Reserves. About 1.50 miles of trail will remain in Riparian Reserves. None of the trail will be within a floodplain except where the trail crosses a stream.

The selected alternative will remove approximately 1.45 acres of vegetation within the Riparian Reserve spread over 1.50 miles of trail. The actual trail tread will encompass approximately 0.36 acres of land across 1.50 miles of trail. Further, user built trails will be "storm proofed" to reduce the potential for erosion (EA pp. 30-31 and 75-78).

Public Involvement

On May 2002, the Forest Service mailed government-to-government and scoping letters to Tribes and to persons on the Snoqualmie Ranger District mailing list, requesting comments on the proposed reconstruction/relocation of the Pratt River Trail project. The Forest Service received thirty-four written responses and comments to the government-to-government and public involvement scoping effort. Further, a public meeting was held on May 23 at the Snoqualmie Ranger District conference room. On August 14, 2006, a second scoping letter was sent to the original four Tribal chairs that were contacted in 2002. As a result of this letter, the Snoqualmie Tribe has shown interest in this project (Appendix A and EA p. 21).

Copies of the pre-decisional EA were mailed to those who participated in the public and government-to-government scoping process or who had requested a copy of the EA, including individuals, groups, and Tribal councils. On July 2, 2008, a legal notice of the availability of the EA was published in the Snoqualmie Valley Record, initiating the 30-day pre-decisional comment period. Twelve emails and letters were received within the established comment period. Substantive comments received from the 30-day comment period are documented along with how they were addressed in Appendix B of this Decision Notice.

Tribal Consultation

On May 2002, letters describing the proposed action and requesting comments and concerns were sent to the Tribal Chairpersons and other identified contacts of the Colville Business Council, Snoqualmie Tribe, Tulalip board of directors, and Yakima Tribal Council. In August of 2006, a second letter was sent to the listed Tribes. Further these Tribes were also sent copies of the EA on July 2, 2008. The Snoqualmie Tribe did show interest in this project and a meeting was held on August 8, 2007 with the Tribal Environmental and Natural Resources Department Director. This August meeting was for sharing information. Other than the meeting with the Snoqualmie Tribe representative, no Tribal comments were received to either mailing (EA Appendix A and pp. 21, 85-86).

Finding of No Significant Impact (FONSI)

I have evaluated the effects of the project relative to the definition of significance established by the Council on Environmental Quality (CEQ) Regulations in 40 CFR 1508.27. I have reviewed and considered the 2008 Lower Pratt River Trail Reconstruction and Partial Relocation Environmental Assessment, which is incorporated by reference herein. Based on the above, I have determined that the Selected Alternative (Alternative 2) will not have a significant effect on the human environment. For this reason, no environmental impact statement (EIS) will be prepared. My rationale for the FONSI follows, organized by subsection of the 40 CFR 1508.27 definition of significance.

1. *Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial [40 CFR 1508.27(b) (1)].*

The proposed project context (society as a whole, affected region, affected interests, and locality) was reviewed, and the intensity (severity) of the negative impacts as a result of implementing The Pratt River Trail Reconstruction and Partial Relocation project is minor. The only short-term impacts for a long-term benefit are: (for the length of project implementation, 1year) implementation is *Likely to Adversely Affect* the spotted owl and marbled murrelet for noise disturbance during implementation. Blasting could result in *May Impact Individuals, Not likely to contribute to a trend toward listing,* of various fish species due to vibrations and concussive impacts to aquatic species This impact will be minimized by allowing noise-generating activities (power saws and blasting) to occur only between August 6 through March 31, and during this timeframe they will only be permitted two hours after sunrise and must cease two hours before sunset (EA pp. 36, 65-66, and 72).

The project will provide long-term recreation opportunities by:

- Improving an existing though inadequate trail that is listed in the Land and Resource Management Plan (LRMP) with an identified need of reconstruction. The trail will provide a Forest Plan need to provide a trail that will be snow-free most of the year (LMRP, Appendix E page E-4, and Forest Wide Standards and Guidelines page 4-87).

- Being consistent with the Forest Plan by providing an adequate for use hiker/equestrian trail near a large campground to provide for visitor use and enjoyment (LRMP, Appendix E, p. E-7).

With implementation of management requirements and mitigation measures, the Selected Alternative will result in few impacts to wildlife. The project will:

- Have no net loss of grizzly bear habitat within the core habitat of BMU #01 (habitat will be above the 1997 baseline level after implementation) (EA pp. 57-58, and 63-65).

- For the spotted owl and marbled murrelet, the effects determination is “Likely to Adversely Affect” due to noise. Adverse effects would be mitigated by timing restrictions. The effects determination for spotted owl and marbled murrelet critical habitat is “No Effect” (EA p. 65-66).

- There would be no effect to other wildlife species other than those previously listed (EA pp. 63-66). .

With implementation of management requirements and mitigation measures, the Selected Alternative will result in few impacts to fisheries.

- There will be no effect to anadromous fish species (EA pp. 71-73).

The project will protect the soil resources by:

- Clay may be encountered during reconstruction or partial relocation. Stabilizing construction techniques used on previous projects, when clay is present, will be utilized with this project. Employing these techniques would result in no detrimental effects to the environment (EA pp. 34 and 92-93).

2. *The degree to which the proposed action affects public health or safety [40 CFR 1508.27(b) (2)].*

   Due to the inadequacy of the Lower Pratt River Trail, users are wading the river to access the Pratt drainage. Depending on river flows this can be an unsafe condition. Reconstructing the trail will provide an adequate and safe alternative to wading the river. Further, public safety will be enhanced by providing a safe and timely method of access to the Pratt drainage that does not currently exist for Search and Rescue (SAR) operations. This is essential for safety in the winter months when weather conditions do not allow aerial operations. Thus, public safety and health will be enhanced (EA, pp. 7 and 95-96).

3. *Unique characteristics of the geographic area such as the proximity to historical or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas [40 CFR 1508.27(b) (3)].*

   A cultural resource inventory and report was completed and submitted to the State Historic Preservation Officer (SHPO) for review and response. The project will have “no effect” to known historic properties associated with American Indian or Euro-American heritage resources listed or eligible for listing on the National Register of Historic Places. SHPO concurred with this finding (EA pp. 82-86).

4. *The degree to which the effects on the quality of the human environment are likely to be highly controversial [40 CFR 1508.27(b) (4)].*

   The degree to which the effects on the quality of the human environment are likely to be highly controversial is considered low. One controversy that has been voiced through public comment is whether or not this segment of trail still exists.

   The first 1 – 1 ½ miles of this trail has been kept open by a high level of public use (EA p. 10). Large segments of the trail can be found on the ground and the trail is considered necessary to provide for public safety. The Pratt trail is listed in the Forest Plan as a viable trail that meets management objectives (EA p. 1).

   Though inadequate, the majority of the 3.25 mile of trail still exists and is adjacent to the Middle Fork Snoqualmie River and follows the curves of the river. However, approximately 0.75 miles of the trail located in Section 29 is not discernible and has either been obliterated by vegetation and lack of use or eroded by the shifting Middle Fork Snoqualmie River. The trail will be rebuilt and relocated so as to have the least effect on Riparian Reserves and lower future management needs (EA p. 9).

   A controversy that has been voiced through public comment is the effect to clay soils in the Pratt River drainage. This project is designed to utilize standard and proven trail construction techniques that would protect clay soils. Two projects that successfully utilized construction techniques in clay soil areas are the Middle Fork Trail to the east and the Middle Fork campground (EA pp. 30-31, 78, and 92-94).

   A controversy that has been voiced through public comment is whether this is a trail that should be rebuilt or should other new trails be built instead. These new trails would access areas that are currently without trails within the Middle Fork drainage. These new trails were considered but eliminated from detailed study (EA p. 26). Nothing in the alternative description or in this decision precludes constructing these other trails in the future (EA pp. 30-31)

5. *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks [40 CFR 1508.27(b) (5)].*

   This decision will not have effects that are highly uncertain or involve unknown risks. Activities included in this decision have been implemented numerous times in the Forest on similar terrain and forest conditions. This type of project has become a routine project for the Mt. Baker-Snoqualmie National Forest. While any action carries some degree of risk, the Selected Alternative was designed and the analysis summarized in the EA was carefully completed to minimize unique or unknown risks. In addition, the Mt. Baker-Snoqualmie National Forest implementation procedures for trail construction will ensure that the effects will be similar to those predicted in the EA. The effects on the human environment of implementing the Lower Pratt River Trail Reconstruction and Partial Relocation project are not expected to be highly uncertain or involve unique or unknown risks (Chapter 3 of the EA).

   Best management practices, constraints, and mitigation measures have been developed to ensure adverse effects to the human environment are reduced or eliminated (DN Appendix A and EA pp. 33-37).

6. *The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration [40 CFR 1508.27(b) (6)].*

   This action is unlikely to establish a precedent for future actions with significant effects or to represent a decision in principle about a future consideration. Though there are no current plans for building other trails in the project area; this decision does not preclude the opportunity to construct new trails in the drainage. The only planned future activity in the drainage is maintenance of existing trails as in addition to this one.

7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts [40 CFR 1508.27(b) (7)].*

   For an action to contribute to cumulative effects there has to be some kind of additive or interactive effect. The cumulative effects of the alternatives and the past, present, and foreseeable future actions are disclosed in Chapter 3 of the EA, in conjunction with Appendix C of the EA. The EA discloses there will be no significant cumulative impacts by implementing the Lower Pratt River Reconstruction and Partial Relocation project, including foreseeable future actions (Chapter 3, Environmental Effects, under each resource section, and Appendix C of the EA).

8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources [40 CFR 1508.27(b)(8)].*

   Cultural surveys of the project area were conducted with review by the Forest Archeologist; nine resources were recorded. The project will have “no effect” to known historic properties associated with American Indian or Euro-American heritage resources listed or eligible for listing on the National Register of Historic Places (EA pp. 82-86).

9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973 [40 CFR 1508.27(b) (9)].*

No suitable habitat for the spotted owl or marbled murrelet will be removed. There could be some temporary disturbance to these species through noise and increased human activity. As a result, the effects determination is: *Likely to Adversely Affect.* To alleviate adverse affects from noise, timing restrictions will be implemented for this project. The effects determination for critical habitat for both species is: *No Effect* (EA pp. 65-66).

Consultation with the U. S. Fish and Wildlife Service was conducted and completed in 2002. The bald eagle was de-listed in 2007 and is managed and administered under the Forest Service sensitive species program. The effects determination for the bald eagle is: *No Effect.* Implementation of this trail project would result in a reduction of core habitat for the grizzly bear: however, overall, the core habitat will be above the 1997 baseline level (there will be no net loss). Thus, there will be no adverse impacts expected to the grizzly bear of to the gray wolf. The project will have no impact on the Canada lynx. The closest habitat for this species is approximately 14 miles away (EA pp. 63-65).

Chinook salmon, steelhead, and bull trout are currently listed as threatened in Puget Sound under the Endangered Species Act. The Selected Alternative will have “no impact” on these species. It will also have “no effect” to designated Chinook or bull trout critical habitat. The National Marine Fisheries Service has not designated critical habitat for steelhead, but regardless there will be “no effect” because there is no steelhead habitat. This project will also have “no effect” on essential fish habitats (EA pp. 68 and 73).

10. *Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment [40 CFR 1508.27(b) (10).*

    The project is designed to meet all applicable Federal, State, and local laws (Chapter 3 of the EA, and Forest Plan Consistency Appendix F).

National Forest Management Act Consistency Findings

The Mt. Baker-Snoqualmie National Forest Plan, as amended was developed and approved (1990) using the provisions of the planning rule in affect prior to November 9, 2000 (the 1982 planning rule). The Forest Service now has a new planning rule (36 CFR 219, published in the Federal Register on April 21, 2008) referred to as the 2008 planning rule. The 2008 rules specifically states at 36 CFR 219.14(b)(4) that, for plans developed under the 1982 rule, the 1982 planning rule is without effect. There remain no obligations from that regulation, except those that are specifically in the plan. The only requirement specifically provided in the 2008 rule related to projects is at 36 CFR 219.8(e), requiring that projects and activities must be consistent with the applicable plan components. As required by 36 CFR 219.8(e), I have found that this project is consistent with Mt. Baker-Snoqualmie Forest Plan, as amended. For my consistency findings, refer to the “Forest Plan Consistency” section above.

Findings Required By Other Laws and Regulations

My decision is consistent with all applicable laws and regulations and Forest Plan direction and applicable standards and guidelines (EA pp. 3-5, 8, 13-20 and Chapter 3 and Appendix F of the EA, applicable laws and regulations in each resource section, and other effects Chapter 3 of the EA).

Administrative Appeal

This decision is subject to administrative appeal pursuant to 36 CFR Part 215, only by those individuals and organizations who provided substantive comments during the 30-day comment period on the EA The appeal must meet the requirements at 36 CFR 215.14.

The appeal may be filed with the Appeal Deciding Officer, Forest Supervisor, Attn: 1570 Appeals, 2930 Wetmore Avenue, Suite 3A, Everett, WA 98201.

Appeals may also be faxed to (425) 783-0214, sent electronically to appeals-pacific northwest-mtbaker-snoqualmie@fs.fed.us, or hand delivered to the above address between 8:00 AM and 4:30 PM, Monday through Friday except legal holidays.

Appeals, including attachments, must be filed within 45 days after the publication date of this notice in The Snoqualmie Valley Record (newspaper of record) Snoqualmie, Washington. The publication date in the newspaper of record is the exclusive means for calculating the time to file an appeal. Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source.

Electronic appeals must be submitted as part of the actual email message, or as an attachment in a Microsoft Word (.doc), rtf, or .pdf format only. E-mails submitted to e-mail addresses other than the one listed above, in other formats than those listed, or containing viruses will be rejected. E-mailed appeals must include the project name in the subject line. In cases where no identifiable name is attached to an electronic message, a verification of identity will be required.

It is the appellant’s responsibility to provide sufficient project- or activity-specific evidence and rationale, focusing on the decision, to show why the Responsible Official’s decision should be reversed.

It is the responsibility of each individual and organization to ensure their appeal is received in a timely manner. For electronically mailed appeals, the sender should normally receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive such an automated acknowledgement, it is the sender’s responsibility to ensure timely receipt by other means.

Project Implementation

Implementation of this project decision cannot begin until the 15th business days after the disposition of any appeal, depending on the nature of that resolution. If no appeal is filed, implementation of the decision may begin on, but not before, the 5th business day after the close of the appeal period.

Contacts

For further information, contact Jim Franzel, District Ranger; or Don Davison, I.D. Team Leader, at the Snoqualmie Ranger District, 902 SE North Bend Way, Bldg 1, North Bend, WA 98045; or by telephone at (425) 888-1421; or by email ddavison@fs.fed.us.

/s/ James Franzel

JAMES FRANZEL

District Ranger
Snoqualmie Ranger District
Mt. Baker-Snoqualmie National Forest

February 6, 2009

Date

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Attachments

Appendix A: Project Elements and Mitigation Measures

Appendix B: Public Comment and Responses from 30-Day Comment Period

Appendix C: Lower Pratt River Trail Reconstruction and Partial Relocation Selected Alternative Map

Appendix A: Project Elements and Mitigation Measures

The following are standard best management practices (BMPs), management constraints, and mitigation measures, included as part of Alternative 2. These BMPs, constraints, and mitigation measures were incorporated from resource specialist reports located in the project record. Estimated mitigation effectiveness, or the basis for effectiveness, is described with each mitigation measure.

Cultural Resources

- The relocated segment of trail where it crosses Rainy Creek may affect a segment of collapsed wooden waterline. If this waterline is encountered, a segment of the waterline (a 10' section) is to be moved out of the way and laid parallel to the remaining undisturbed line enabling the trail to be constructed. The goal is to maintain the integrity of existing structures, such as the waterline, while being able to complete the project. Though a section of waterline would be moved, the entire structure would still be in its original context thus preserving this feature on the landscape.

  Mitigation Effectiveness: Past experience has shown that a minor disturbance to a linear cultural resource feature on the landscape does not affect the integrity of the feature, thus providing for future analysis and interpretation of the cultural resource.

- If a previously unidentified resource is discovered during project implementation, or if an identified resource is affected in an unanticipated way, the Forest Heritage Specialist shall be notified and the Forest will fulfill its responsibilities in accordance with the Programmatic Agreement between the Advisory Council on Historic Preservation (ACHP), Washington State Historic Preservation Office (SHPO), and United States Department of Agriculture–Region 6 Forest Service. (1997 Programmatic Agreement)

Botany

- The round leaf orchid, *Platanthera orbiculata* occurs along the trail route. Have a botanist identify and mark (flag) any examples of this species that could be affected during trail layout and prior to the beginning of construction. Avoid physical disturbance of this orchid by routing the trail at least 20 feet slope distance from each plant.

- To ensure that project activities would avoid threatened and endangered (T&E) plant locations, have a botanist identify and mark known plant locations prior to final trail design. Once identified, reroute the trail as necessary.

  Mitigation Effectiveness: Avoidance is a common practice used on the Forest and has proven to be highly effective at providing protection to T&E plants.

- If any previously undiscovered vascular plants, bryophytes, lichens, or fungi are encountered at any time prior to or during project implementation, work is to cease until a botanist is consulted and necessary mitigation measures are enacted (USDA Forest Service 1990b p. 4-127).

  Mitigation Effectiveness: This method of detection is effective in locating species of plants thus being able to complete the affected project yet have a minimal effect on any located species.

- The trail contractor must ensure that all machinery and equipment (including hand tools and trailers used for hauling) are free of soil and vegetative material before entering on to Forest Service lands. Designated Forest Service personnel may inspect machinery and equipment as necessary (USDA 2005a).

- If bare soils are to be seeded for erosion control, all seed mixes will be locally collected native species or those desirable non-native species recommended for use on the National Forest (Potash and Aubry, 1997).

  Mitigation Effectiveness: Past experience has shown that by cleaning equipment and being selective of the types of seed used on National Forest lands, that the threat of spreading noxious weeds is greatly reduced.

Soils

- Reconstruction and construction of the trail(s) is to follow regional standards as follows: Standard specifications for the Construction of Trails, EM-7720-103 and Standard Drawings for the Construction and Maintenance of Trails, EM-7720-103.

- Standard trail and design techniques to be used if lacustrine (clay) soils (as well as other sensitive soils) are encountered include the installation of puncheon, turnpike, drainage ditching, and native-borrow or imported gravel surfacing. The decision on the type of appropriate trail structure is made on a site-specific basis. The final design of this trail may include quantities of all of the above.

- Reduce trail grades (measured in percent) through sensitive soils (including clays). Out-slope the trail bed as much as the side-slope allows (typically 3.0%). Segments of trail that cross flat areas would be crowned using imported and crushed rock (typically 5/8” minus) that is to be mechanically compacted. If necessary, use coarser rock (3” minus) as a base in wetter areas and if necessary, filter cloth to separate surfacing material from the sub-grade.

  Mitigation Effectiveness: Past experience in constructing facilities in the Middle Fork drainage has shown that the construction methods described above are effective in mitigating effects to clay soils. Projects that have utilized these techniques include construction of the Middle Fork Trail (from the Middle Fork Bridge, east towards Goldmyer Hot springs) and construction of the road, camping areas, picnic areas, and day-use area in the recently constructed Middle Fork Campground.

- If an alternative is selected to allow stock on the trail, close the trail to stock uses for one year following completion to allow “hardening” of the tread. Following the first year, implement annual closures during the wet seasons as necessary to protect the trail.

  Mitigation Effectiveness: Past experience has shown that by closing trails to use (other than hiking) for periods of time greatly reduces adverse effects not only to the trail but to the environment. Periodic closure reduces the costs of maintenance and lengthens the life of the trail and aids in preventing erosion and soil displacement.

Recreation

- Discourage use of the original trail not being rebuilt and all user-built trails by obscuring the trail segments with debris generated from brush clearing and trail reconstruction. Material should be placed perpendicular to the unused trail and parallel to the existing trail to act as a retaining structure or a drainage structure.

  Mitigation Effectiveness: Past experience has shown that obscuring trails with native materials is an effective method of directing use onto the newly rebuilt trail and away from segments that are being rehabilitated.

- Place water bars in the trail segments that are not to be used or in user-built trails to control run-off and soil erosion. Once water bars have been installed, seed and mulch bare soils on the trail segments or user-built trails that are no longer to be used. Use seed as defined in the Botany mitigation measures listed above.

  Mitigation Effectiveness: Past experience has shown that this method of trail rehabilitation is effective in reducing the potential for soil disturbance and to permanently obscure trails that are being rehabilitated.

- If deemed necessary, install signs prohibiting horses from utilizing the area around Pratt Lake. If needed, designate an area away from the lake where horses can be tethered for the night.

  Mitigation Effectiveness: Past experience has shown that in general, the majority of people who use horses on National Forest Lands follow all regulatory signs and requirements. However, on occasion, some forest users will ignore such controls and involving law enforcement may become necessary.

- Lop and scatter any slash generated from the implementation of this project along the length of the trail or at the entrances to trail that is not being used or at user-built trails; burning is not being considered in this proposal.

  Mitigation Effectiveness: Past experience has shown that lop and scatter is a cost effective and esthetically pleasing method of slash disposal (versus piling and burning or others).

- If deemed necessary for public safety, the felling of hazard trees within riparian reserves is allowed (RA-2 ROD C-37). Leave all trees in place after felling.

Fisheries

- All projects potentially affecting the beds and banks of stream, lakes, or other water bodies shall meet all provisions specified in the Memorandum of Understanding with Washington Department of Fish and Wildlife (WDFW) for hydraulic projects, including in-water timing periods. For the Middle Fork Snoqualmie sub-watershed, the timing period is July 15 – October 31 (Forest BA standard management practice for fish).

- Trails shall be located away from stream banks and out of floodplains where feasible to retain the largest pieces of downed wood possible in stream channels and floodplains and to minimize the

need to buck large riparian trees during trail clearing activities (Forest BA standard management practice for fish).

- Use of treated wood shall follow best management practices for treated wood in western aquatic environments (WWPI 2000). (Forest BA standard management practice for fish)

- To retain the largest pieces of downed wood possible in stream channels and floodplains, bucking of large riparian trees during trail-clearing activities shall be restricted to only those trees that must be cut (Forest BA standard management practice for fish)

- To educate the recreational user about the effects of rock dams on fish, WDFW signs addressing this issue should be posted at the Middle Fork Campground and at or along the trails near the river(s) (Forest BA standard management practice for fish).

- If blasting is needed, effects to fish from in-water vibrations should be minimized by the following: a) Avoid surface charges to minimize potential addition of blasted materials to fish-bearing waters. b) Divide and separate charges with appropriate lengths of detonation cord to achieve delays of approximately 50 milliseconds between the charges (Between 25-100msec, with a target of 50msec). Use the MBS blasting guidelines attempting to not exceed the potentially lethal distance and charge weight (Forest BA standard management practice for fish).

- There shall be no excavation, filling, or disposal of material within the wetted perimeter of the stream (Forest BA standard management practice for fish).

- Have hazardous spill clean-up materials on-site (Forest BA standard management practice for fish).

Wildlife

- To minimize potential noise impacts to the northern spotted owl and marbled murrelet, noise-generating activities (power saws and blasting) will only be allowed between August 6 through March 31 and only permitted two hours after sunrise and must cease two hours before sunset. (2003 Forest Programmatic Biological Assessment)

- Coarse woody debris already on the ground should be retained and protected to the extent possible from disturbances during trail construction/reconstruction (USDA USDI 1994, p. C-40).

- Snags are to be retained along the trail unless they are a potential threat to public safety (USDA USDI 1994, p. C-42).

- Use of explosives within suitable habitat during the nesting season will incorporate guidelines in: “Guidelines for Blasting on National Forest Lands in Relation to Disturbance to Wildlife.”

Lands and Facilities

- During trail construction/reconstruction activities, place signs at appropriate locations near the Middle Fork trail-bridge to warn forest users of project activities.
  Mitigation Effectiveness: Warning users that they may be entering a work zone within the project area heightens user awareness and reduces the risk of accidents. This practice is highly effective and routinely used to warn users of the hazards of reconstruction work on narrow Forest Service trails.

Monitoring

Heritage: During reconstruction, have a Heritage Resource Tech. or Archaeologist observe removal of a segment of wooden water pipe (if necessary). Periodically check progress to ensure no further disturbance occurs.

Measure: Ensure that a minimum amount of pipe is disturbed.

Botany: Prior to project implementation, have a botanist mark locations of specific species of plants so that they can be avoided during implementation. Periodically inspect to ensure no other example(s) is present.

Measure: Ensure that all marked plants are left undisturbed.

Reconstruction: Ensure that all requirements (mitigations and best management practices are listed in the EA are included in the reconstruction contract and that they are adhered to during reconstruction activities.

Measure: Ensure that a Contracting Officer or Contracting Officers Representative is familiar with all contract requirements and that regular inspections occur on-the-ground ensuring that all requirements are implemented.

Appendix B: Public Comment and Responses from 30-Day Comment Period

Introduction

The Lower Pratt River Trail Reconstruction and Partial Relocation Environmental Assessment (EA) was prepared and made available for a 30-day comment period on July 2, 2008. The Snoqualmie Ranger District mailed a copy of the EA to individuals, groups, and organizations that commented or provided information during the initial scoping for the document or provided input during development of the EA. A Public Notice requesting comments appeared in the "Snoqualmie Valley Record" and on the Mt. Baker-Snoqualmie National Forest website on July 2, 2008. The 30-day comment period ended on August 1, 2008.

The Forest Service received 12 emails and letters during the 30-day comment period (July 2 through August 1, 2008). Comments from these emails and letters are as follows:

Doug Walker

Comment: I do not believe Alternative 1 (no action) is a viable option. I do favor Option 2 (hiker trail only). The environmental impacts seem modest and this will give a huge boost to outdoor recreation, which is accessible all year round. As your document indicates, there are not very many low elevation areas like this in the forest, so it will be a great improvement to have this trail. I can certainly live with Alternative 2, but it is more expensive and the demand did not seem to be strong.

> **Forest Service Response:** Comment noted; Alternative 1 is *No Action*; Alternative 2 is the proposed action, *Reconstruct or Relocate for use by Horses and Hikers;* Alternative 3 is, *Reconstruct or Relocate for use by Hikers only* (Refer to the EA pp. 29 - 32). Since the writer favors a "hiker only trail," the assumption is that this person prefers Alternative 3.

Barbara Lierson

Comment: I am in favor of the Pratt River Trails plans.

> **Forest Service Response:** Comment noted.

Jeffery Smith

Comment: Please include mountain bike use on trail and connectors outside the wilderness. While some groups may prefer separate trails, this can lead to a hodgepodge of poorly maintained trails, rather than well-engineered, well-maintained trails with minimal impact on natural resources and wildlife.

Forest Service Response: Comments noted. Due to public comments received during the 30-day comment period, an alternative that would allow mountain bike use on this trail was considered but was eliminated from detailed study (Refer to p. 27 in the EA).

Michael Leake

Comment: I am delighted that the consideration regarding reconstruction of the Lower Pratt River Trail is continuing. I have reviewed the document mailed on June 24 and am pleased with the analysis. The suggestion that trail should be relocated is an obvious requirement to make this trail a viable, successful, part of the inventory; therefore I support it.

Forest Service Response: Comment noted; refer to the alternative descriptions beginning on p. 29 of the EA.

Greg Varney through Kathy Decker (King County Sheriff's Office, King County Search and Rescue Coordinator)

Comment: I support this proposed plan as it will provide a safe means for search and rescue personnel to get to the lower Pratt Valley. I was involved in the …. Search and was unable to execute my assignment to travel up the Pratt Valley due to being exhausted after traveling down the Middle Fork/Pratt intersection.

Forest Service Response: Comment noted; Public Safety was included in Chapter 3 of this document (Affected Environment and Effects of Implementation). (Refer to pp. 95-96 of the EA).

Washington Trails Association (Jonathan Guzzo)

Comment #1: Washington Trails Association (WTA) represents 9,000 members and volunteers statewide and is the primary hiker advocacy organization in Washington. As such, we sometimes comment on Forest Service projects. Regarding the Lower Pratt, we write to express our support for Alternative 2, reconstructing and partially relocation the Lower Pratt River Trail to hiker and horse standards.

Comment #2: Linking the Pratt River Trail with the Middle Fork Trail to restore public access to the Pratt is consistent with the management objective of closing the Middle Fork Road at the Taylor River and developing more recreation opportunities in the lower valley. The restoration of the Pratt River Trail will also act as a valve, releasing some of the pressure on much-loved and heavily visited Alpine Lakes Wilderness trails.

Forest Service Response: Comment noted; The Forest Service did not close the Middle Fork Road (Road 56) at Taylor River rather, the road is closed at Dingford Creek. The selected alternative will make an identified inadequate trail in the Forest

Plan, adequate for use, providing safe day-use access opportunities adjacent to a high use campground, provide for safe access for other users and search and rescue operations both in and out of the Pratt drainage (EA pp. 7-10 and 30-31).

Mountains to Sound Greenway (Cynthia Welti)

Comment #1: On behalf of the Mountains to Sound Greenway Trust, I send out strong endorsement of the Lower Pratt River Trail Project and the selection of Alternative 2 – Proposed Action, Reconstruct or Relocate for use by Horse and Hikers.

Comment #2: …this proposed trail will help serve new recreationists drawn to the area of the new campground. All of this is consistent with the goals that many stakeholders developed in the 1997 "Middle Fork of the Snoqualmie River Valley River Corridor Public Use Concept."

Comment #3: The Greenway has supported closure of the Middle Fork Road at Dingford with the understanding that additional day-hike opportunities, like this one, would be developed in the lower valley. We also have supported the expansion of the Alpine Lakes Wilderness with the understanding that it would not have undue impacts on hiking opportunities.

Comment #4: It is important that recreational opportunities provide for public safety and are done in a way that is as sensitive as possible to natural resources. It is also notable that this proposal will allow better access for Search and Rescue teams that are regularly called into the Pratt drainage.

Forest Service Response: Comments noted; Alternative 2 is the proposed action, *Reconstruct or Relocate for use by Horses and Hikers* (Refer to p. 30 of the EA). Refer to pages 3 - 5 and pp. 88 - 91 of the EA for a discussion on wilderness. Refer to pp. 95-96 of the EA for a discussion on public safety.

Recreational Equipment Inc. (REI) (Michael Collins)

Comment #1: We wish to comment in favor of Alternative 2 and Alternative 3 of Lower Pratt River Trail Reconstruction and Partial Relocation Project. It is our belief that both alternatives support backcountry safety and access.

Comment #2: Alternative 2 and 3 allows improved access from the Middle Fork. This creates a significant win for recreational users entering the Lower Pratt River Drainage from the Middle Fork as well as much better access for Search and Rescue, when required.

Comment #3: We believe that reclaiming the trail is of great benefit to the recreation community because it offers enhanced access to a prime outdoor area near to the Seattle metro area; it offers low-elevation hiking opportunities; and by providing another access point to the drainage, it is likely to better disperse users.

Forest Service Response: Comments noted; Alternative 2 is the proposed action, *Reconstruct or Relocate for use by Horses and Hikers* (Refer to p. 30 f the EA). Refer to p. 31 of this EA for a description of Alternative 3 *Reconstruct or Relocate for use by Hikers only.* Refer to pages 95 - 96 of the EA for a discussion on public safety. Refer to pages 88 and 91 of this EA for a discussion of trail use and dispersing users both inside and outside of the wilderness.

Walter and Elisa Shostak

Comment #1: I am writing to express my disappointment that this project does not include an option with a trail designation for mountain bike use.

Comment #2: The success of the experimental mountain bike use on the Middle Fork Trail on odd numbered days demonstrates that mountain bikers are responsible visitors on the forest.

I applaud the District for recently making this arrangement permanent.

Comment #3: It is my understanding that USFS policy has always been "open unless signed closed." The trail sign had no use restrictions posted.

In fact, the Pratt River, Middle Fork, and Thompson Lake trails are listed as "Other Trails Open" on a spreadsheet listing trails open to mountain bikes on the MBSNF, most likely obtained from the North Bend Ranger District in the late 1980's or early 1990's.

I urge you to include an option with a trail designation for mountain bike use on the Lower Pratt River Trail and valley.

Forest Service Response: A spreadsheet included with this letter lists "Trails open to Mountain Bikes" on the Mt. Baker-Snoqualmie National Forest (Listed by District). In reviewing this list, no trails within the Middle Fork drainage are included for use by mountain bikes. However, portions of the Snoqualmie Lake Trail (Trail 1002), the CCC Trail, the closed Middle Fork road from Dingford Creek to Hardscrabble, and a portion of the Middle Fork Trails are open to mountain bikes. Due to public comments received during the 30-day comment period, an alternative that would allow mountain bike use on the Lower Pratt River Trail was considered but was eliminated from detailed study (Refer to p. 27 in the EA).

Len Gardner

Comment #1: In connection with my own experiences on the Lower Pratt River Trail… I became aware of the clay soil, which prevails in the Lower Pratt Valley. This clay layer is unsuitable as material on which to build a trail. When wet, it becomes slick and mucky.

This clay is extremely prone to erosion when wet, which is most of the time, and quickly turns to mire under impact from boots, wheels, or hooves.

The subject EA acknowledges the clay layer in passing (pages 89 – 90) but does not adequately consider the problems that would result from heavy trail use on such poor base material. In particular it does not document any excavations along the proposed route to determine the extent of the clay layer or to evaluate its erosive potential.

Mitigation measures discussed for building the proposed trail (pages 33 – 34) do not adequately address the clay problem.

Comment #2: In addition, the EA does not consider all mitigation measures for the increased use of the existing trail that would result form connecting it with the Middle Fork Trail. Damage to the portion of the existing trail below the railroad grade is to be, expected as it is built on clay.

Comment #3: Erosion from the clay layer will be detrimental to water quality in the nearby Pratt River. The EA should evaluate the expected damage to the existing trail, as well as the impact on water quality, and should address mitigation measures.

Comment #4: A major part of the rationale for the project is "to provide for public safety" (p. 1). The EA says this has to do with "a total lack of helicopter landing areas within this drainage" (p. 7). Yet on p. 51, the EA discloses that, "King County Search and Rescue (SAR) cleared a helispot in a level area on the east side of the Middle Fork Snoqualmie River and to the north of the Pratt River."

Comment #5: Finally, I note that the EA addresses the question of possible expansion of the Alpine Lakes Wilderness into the project area (p. 85). In this regard, the EA mentions the provision in the Alpine Lakes Management Plan that areas within the ALW without trails remain trail-less (EA pp. 5 and 85). The EA then dismisses the application of this provision to the subject project by stating that the "proposed alternatives in this document would rebuild and relocate an existing trail regardless if it is in wilderness or not. The proposed trail is not existing in fact, much of the original trail in the riparian area has been washed away and substantial portions of it would be built (relocated) where no trail ever existed (pages 9 – 10).

> **Forest Service Response:** The soils report for this document is in the project file. The potential for eroding soils entering the Middle Fork within Riparian Reserves is part of a "Key Issue" (EA p. 22) Potential effects to soils is a concern under "Other Issues" (EA p. 23). An alternative that would rebuild the trail in its original location has been considered but rejected due to the possible effects to Riparian Reserves as well as other environmental concerns (EA pp. 25 and 26). The alternatives describe various trail construction techniques for the protection of soils, depending on soil conditions (Alternative Descriptions, EA pp. 30-31). Various standard management requirements

and mitigation measures are listed under botany, soils, and recreation that specifically address the protection of soils and in-turn, protect other resources such as water (EA pp. 33 and 36). Trail treads are generally 18" to 24" in width thus, the total affected area where bare soil could occur is 0.6 to 0.8 acres. Specific soils are listed as occurring in the project area and specific historic and proven trail construction techniques were described when utilized, prevent soil damage (including clays) EA pp. 92-94).

Public Safety is a part of the "Need for Action" in this EA (EA p. 7). Search and Rescue (SAR) personnel have had to access the Pratt drainage during all seasons including summer, fall, winter, and spring (EA p.7). During the winter months, the only way to access the Pratt drainage is from the bottom or by helicopter (aircraft are only effective if clouds and fog do not obscure both the one landing area and the ground that is to be searched whether it is summer or winter) (EA p.7). Due to the lack of clearings, there is no suitable helicopter landing areas (EA p. 7). However, to facilitate future searches, in C.Y. 2006, SAR did clear a landing area. Thus, combining both a reconstructed trail with the landing area would accommodate all possible SAR activities. With an inadequate trail, a situation exists that is unacceptable when SAR is required to enter the Pratt drainage and swift actions are needed (especially if a helicopter landing area cannot be used) (EA p. 49). Alternatives 2 and 3 would meet the "Need" for public safety as described in the EA (EA pp. 50-54). The Effects of Implementation for Public Safety are described in the EA (EA pp. 95-96).

Trails have existed along the Middle Fork and Pratt River since at least 1905 (Recreation Report (REC) p. 1). Railroad logging began in the Middle Fork in 1920 (REC p. 1). Trails in the Middle Fork and Pratt drainages had been obliterated by logging but were then rebuilt either during or after logging (REC p. 1). That segment of trail from the Middle Fork Trail Bridge and the Pratt River has not been maintained since the 1960's however, in 2007, maintenance had been preformed on the Pratt River Trail in 2007 (REC p. 1). The segment of trail discussed in this document is a system trail and is in the inventory of trails within the MBS Land and Resource Management Plan (Table E-1, pages E-20 and E-21) (REC p. 11).

MidFORC (Mark Boyar)

Comment #1: We feel that the Pratt Connector trail does not answer the greatest need in the Middle Fork Valley, which is for view trails accessible from the campground and other points in the lower valley. There are many days of river hiking along the Middle Fork and Taylor trails already…. Given how difficult trail construction funds are to come by, we would rather they were applied to a new view trail… I would like to offer one correction to the EA regarding invasive (plants)… there is evergreen blackberry on the logging track leading away from the Pratt and in the helispot cleared by King County SAR.

Forest Service Response: Other trails were considered and eliminated because they did not meet the project purpose and need and were not within the scope or decision space of the project (EA pp. 25-29). Neither the alternatives nor this decision preclude construction of new trails in the Pratt or Middle Fork river drainages. If justified, all new trails recommended both during the scoping process and during the 30-day comment period, by the public, could be considered and possibly built. The EA is consistent with the LMRP because it states: *Priority for use of trail funds will generally be as follows: b) Reconstruction and relocation of existing trails to protect the resources" (LMRP, Appendix E, p. E-5, Item 13, part b)* (EA p. 4).

Comment about the invasive blackberry is noted and this information has been passed on to the District Botanist.

Alpine Lakes Protection Society/North Cascades Conservation Council (Rick McGuire/Marc Bardsley)

Comment #1: It would not provide an attractive recreational experience compared to other alternatives which the Forest Service has failed to consider. Its purported safety benefits are grossly overstated, and the Forest Service, as far as we know, has taken no steps to address any possible problems of hikers getting lost in the Upper Pratt watershed after hiking from I-90… The proposed project would be a very poor use of taxpayers' money, especially considering that there are so many better alternatives, alternatives ignored by the Forest Service,

Forest Service Response: Other trails were considered and eliminated because they did not meet the project purpose and need and were not within the scope or decision space of the project (EA pp. 25-29). Safety was a concern as described in the "Need for Action" (EA p. 7) and as analyzed in the document (EA pp. 95-96). Both the King County Sheriff's Office and King County Search and Rescue Coordinator support this project to provide better access for search and rescue operations (Refer to this appendix p.20). Current Forest Service District maps clearly show that the Trail along the Pratt River ends at the Middle Fork Snoqualmie River and that the Lower Pratt River Trail is a "Low Maintenance Trail" (Refer to the current District Map).

Comment #2: This project would construct an entirely new trail. There is currently no trail between the Taylor River area of the Middle Fork Snoqualmie (the Gateway Bridge area) and the Pratt River Valley. There has been no trail along this corridor for approximately 80 years. The railroad based logging of the Middle Fork valley in the 1930's eliminated this portion of what was once the Middle Fork Trail. Once the valley was logged, the trail was buried in logging slash, was no longer used, and disappeared. New forest grew up and the trail ceased to exist. The EA states that this portion of the Middle Fork trail was depicted on a 1930 reprint of a 1923 map. However, this is the last known depiction of any map of any trail in this area until the Forest Service put it on its 2008 Snoqualmie Ranger District map

as a "low maintained trail."… and the Forest Service depiction of it on their 2008 map is a case of politically inspired cartography with no basis in reality. We are told that there are public safety concerns because there is no trail there, yet the claim is made that this is an existing trail. Which is it?

> **Forest Service Response:** Loggers began moving up the Middle Fork Snoqualmie River drainage in the 1920's and logged the Middle Fork, Taylor River, and Pratt drainages up into the 1940's (Recreation Report p.1, Analysis File). Many of the trails in the Middle Fork drainage were rebuilt following logging, including the Pratt River trail, the Middle Fork Trail past Goldmyer Hot Springs and beyond, and the Snoqualmie Lake Trail (Refer to current trail maps.) A 1950 edition of a United States Geological Survey (USGS) map indicates that a trail still existed along the Middle Fork Snoqualmie River, following the original route (EA, Analysis File).
>
> The Lower Pratt River Trail, though inadequate for use exits. Portions of it have washed out and it has not been maintained since the 1960's (EA p. 1). Field observations in calendar year 2006 indicate that the majority of this 3.25 mile segment of trail (Lower Pratt River Trail) still exists and is adjacent to the Middle Fork Snoqualmie River (EA p. 9). The segment of trail discussed in this document is still considered a system trail and is in the inventory of trails within the MBS Land and Resource Management Plan (Table E-1, pages E-20 and E-21) (REC p. 11). As previously discussed, the trail is inadequate because it has not been maintained, is overgrown with brush and part of the trail is missing thus, users "…have to pick and choose their route along visible segments of the remaining Lower Pratt River Trail…"(EA p. 95). Though the Pratt Trail has not been maintained in several years, consistent use of the first 1 – 1 ½ miles of the trail by the public have kept the tread open and fairly clear of brush (EA p. 10). The Lower Pratt River Trail is listed within the Mt. Baker-Snoqualmie National Forest, Forest Plan as a viable trail that would help in meeting management objectives (Forest Plan, Appendix-E page E-8) (EA p.1). The 3.25 miles of trail that would be reconstructed/relocated under alternatives 2 and 3 is listed as a system trail in the Land Management Plan (Appendix E, page E-21) (EA p. 56).

Comment #3: This section of the EA mentions the Mountains to Sound Greenway "Middle Fork of the Snoqualmie River Valley River Corridor Public Use Concept, Phase II" (1997). The MTSG Concept Study shows only a possible trail between Taylor River and the Pratt depicted on the map. The MTSG Concept Study was formulated at a time when the understanding of the potential recreation opportunities in the Middle Fork Snoqualmie was at an early stage. The document referred to was a "Concept Study," not an ironclad plan. Likewise, much more is now known about the Middle Fork valley in general, and the recreational opportunities there, particularly as regards locations for new trails, than was known in 1997. The EA fails to acknowledge this or to examine the other trail proposals which have been repeatedly been made to the Forest Service.

Forest Service Response: The "Middle Fork of the Snoqualmie River Valley River Corridor Public Use Concept, Phase II" (1997) was referred to in this EA (EA page 9). The Interdisciplinary Team for the Lower Pratt River Trail Reconstruction and Partial Relocation project referred to and considered the concepts in this document during planning in an attempt to be responsive to the desires of the public in the management of the Middle Fork and Pratt River drainages. As of the date of this writing, no other documents or updates or amendments or changes to the 1997 concept plan have been provided to the Forest Service. Thus, ideas presented in this document in most cases are still considered valid. The Mountains to Sound Greenway (authors of the Concept Plan) endorses this project and the reconstruction of the Lower Pratt River Trail (Refer to this Appendix p.21). Other trails in the Middle Fork Snoqualmie River watershed were considered and eliminated from detailed study because they did not meet the project purpose and need and were beyond the scope of the project. This analysis does not preclude other trails from being proposed and developed within the Middle Fork Snoqualmie watershed (EA p. 26).

Comment #4: Although never specifically stated in the EA, it appears that there are concerns about hikers getting lost after accessing the uppermost Pratt River watershed from trails which begin along the I-90 corridor and climb up… Apparently some hikers have gotten lost and mistakenly descended into the Pratt River valley instead of going back the way they came in returning to the I-90 trailheads. The absence of any supporting discussion or statistics or indeed acts of any kind in the EA makes it difficult to know whether there really is such a problem and if so, its severity. Other measures could be taken to help the possible problem at its source. Such measures could be as simple as having adequate signage alerting people that descending the Pratt valley is not the way back…

Forest Service Response: There is no safe, direct access to the Pratt drainage from the Middle Fork Road (Road 56), the Middle Fork Campground, or the Middle Fork Trail (EA, Need for Action, p.7). Those personnel involved with search and rescue are concerned with access to the Pratt drainage because in calendar year 2006, King County Search and Rescue (SAR) cleared a helispot in a level area on the east side of the Middle Fork Snoqualmie River and to the north of the Pratt River (On the opposite side of the river from Road 56). This clearing was completed so that SAR could access the lower Pratt drainage in the event that search and rescue activities as well as the possibility of the extrication of victims could be accomplished (EA p. 54). In 2007, a lost hiker was reported around Snow and Gem Lake. Not knowing where the lost person may have gone, SAR accessed the Pratt drainage from the top. This is because there was no easy access from the bottom (EA pp. 95-96). In 2003/2004, a lost cross-country skier was reported near Snoqualmie Pass. Eventually the skier was located in the upper portion of the Pratt drainage (EA pp. 95-96). Both the King County Sheriff's Office and King County Search and Rescue Coordinator support this project to provide better access for search and rescue operations (Refer to this appendix p.20). Signing trails would be a method to direct hikers that may be "turned-around" on the trail

system however, once a hiker leaves a trail, no signage would aid in helping the hiker in returning to a trailhead. This is especially true when there may be 8 – 10 feet of snow on the ground as occurred in 2003/2004. As has been mentioned and discussed in the EA, the issue is providing safe access to rescue personnel when an unfortunate incident occurs and SAR is needed to locate lost forest users.

Comment #5: In the paragraph entitled "Build `Trails in Other Locations" the EA summarily dismisses the other trail proposals which have been made to the Forest Service over a period of many years.

Forest Service Response: Other trails were considered and eliminated because they did not meet the project purpose and need and were not within the scope or decision space of the project (EA pp. 25-29).

Comment #6: The Forest Service claims that it is impossible to build new trails in Wilderness. However, there is nothing in the Wilderness Act which prevents trail building. Forest Service prohibitions on trail building in Wilderness are entirely self-imposed and have no basis whatsoever in law.

Forest Service Response: The Lower Pratt River Trail Reconstruction and Partial Relocation project is in compliance with the Mt. Baker-Snoqualmie National Forest Land and Resource Management Plan (as amended) (LRMP) (1990) (EA pp. 13-16). Congress directed the Forest Service to complete an "Alpine Lakes Area Management Plan" (ALMP) which was completed November 2, 1981 (EA p.4). The ALMP was incorporated into the 1990 Forest Plan (EA p. 17). Under the ALMP, *"Portions of the Wilderness without trails will be managed to remain trail-less"* (EA p. 5). If the Pratt drainage in incorporated into the Alpine Lakes Wilderness, then by definition trail-less means: *"Areas are greater than 500 feet from system trails…,"* (EA pp.88-89) thus, no new trails could be built where the location is beyond 500 feet from any existing trail. The Lower Pratt River Trail is listed within the Mt. Baker-Snoqualmie National Forest, Forest Plan as a viable trail that would help in meeting management objectives (Forest Plan, Appendix-E page E-8) (EA p.1). The 3.25 miles of trail that would be reconstructed/relocated under alternatives 2 and 3, though currently inadequate for use by hikers/equestrians is listed as a system trail in the Land Management Plan (Appendix E, page E-21) (EA p. 56).

Comment #7: The conservation groups have invested substantial time and energy over the past decade in identifying and locating the best places to build new trails in the Middle Fork Snoqualmie. Even putting all other issues and problems aside, the conservation groups do not believe that building a trail from Taylor River down the southeast side of the Middle Fork to the Pratt Valley would offer the best recreational experience to the public or offer anything approaching the best and wisest use of scarce trail building dollars. Trail construction dollars are scarce and the conservation groups look upon expenditure of these monies in unproductive ways as an egregious waste of public resources. All of the proposed

trail would be located in dense valley bottom forest with few or no views. The trail would essentially duplicate the experience offered by other, already physically existing trails in the area and would offer nothing new.

> **Forest Service Response:** Comment Noted. Refer to pages 7-9 of this EA for the purpose and need for the project. The Forest Service has not ignored public comments regarding possible trails in other locations. Other trails were considered and eliminated because they did not meet the project purpose and need and were not within the scope or decision space of the project (EA pp. 24-29).

Comment #8: Mention is made in the EA of the proposed Taylor to Pratt Trail being snow free for all but two weeks of the year. This is untrue. The proposed trail would be snow covered for more than two weeks in most winters.

> **Forest Service Response:** Comment Noted. The respondent is correct this statement should have stated two months. The EA has been corrected (EA page 3). The Lower Pratt River Trail would be consistent with the LRMP in that: *"Special emphasis will be given to identification and planning for trails at elevations where the ground is usually snow-free for at least half of the year"* (LRMP, Appendix E, p. E-4) (EA p. 4).

Comment #9: The EA devotes only one page to the serious effects of this project on grizzly bear core habitat. The EA states that "a large portion of the trail construction, mainly along the Middle Fork Snoqualmie River is within 1/3 mile of a high use road and is not considered grizzly core habitat." This statement ignores the fact that the Middle Fork Snoqualmie River forms an effective barrier to the movement of people. Core security habitat begins immediately beyond the SE bank of the river, and except perhaps for the limited area immediately downstream of the Gateway Bridge…

> **Forest Service Response:** The baseline for the no-net-loss policy is open road and high use or motorized trails occurring in BMU's as of 7/31/97. Any reductions in core habitat due to new or reopened roads, motorized or high use trails, would need to be offset by increases to core habitats in another area of the same BMU. The new core area (created by closing roads, motorized or high use trails) would need to create an equal or greater area of core habitat and contain equal or greater value of seasonal foraging components compared to the area where core habitat was lost (WL Report and EA pp. 57-58). This decision is consistent with the "no-net-loss" policy because a large portion of the trail construction, mainly along the Middle Fork Snoqualmie River, is within 1/3 mile of a high use road (Road 56) and is not considered grizzly core habitat. Implementation of the Middle Fork Snoqualmie River Watershed Access and Travel Management Plan (ATM) (2005) resulted in a net increase of core habitat as roads were decommissioned or closed (EA p. 57-58). As a result of these closures, Early Core Habitat increased by 3,540 acres and Late Core Habitat increased by 2,465 acres (EA p. 58). Currently, the Pratt Trail can be considered low use however, if either Alternatives 2 or 3 were implemented, the portion of the Pratt Trail that would

be reconstructed / relocated would more than likely become high use. Thus, this use would effectively eliminate the core grizzly bear habitat that is within 1/3 mile from the trail (EA p. 65). Although there would be a loss of grizzly bear habitat with either Alternatives 2 or 3, the overall core habitat within BMU #01 would be above the 1997 baseline level (there would be no net loss of habitat). After implementation, Early Core Habitat would be 2,424 acres and Late Core Habitat would be 1,375 acres (EA p. 64).

Comment #10: The EA is also dismissive of the changes in use levels which could occur on the existing trail in the Pratt valley. This trail now receives little use, and most of that use is late summer and early fall when habitat values are less critical compared to late winter and spring when they are highest. If the proposed trail is built, it would likely have the effect of turning the existing Pratt River trail within the Pratt River valley from very low use to high use. Yet the EA fails to acknowledge this, and claims that use there would remain low.

Forest Service Response: The EA did discuss the changes in the type of use (Low or High) that will occur on the Pratt Trail system (EA p. 51) as well as effects to the grizzly bear (EA pp. 63-65).

Comment #11: The EA makes only the most perfunctory mention of deer and elk and the possible effects of the proposed project on these species. And again the EA treats the project as if it would affect only the narrow physical corridor which the proposed trail would actually occupy. The EA states erroneously that most of the best elk habitat is downstream from the Pratt/Middle Fork confluence. While there is good habitat downstream, there is also extensive high quality habitat in the Lower Pratt valley itself. The lower Pratt's combination of low elevation and difficult access makes it a winter and spring haven for many species of wildlife. The Forest Service needs to analyze the effects of building trail into this area, and has failed to do so.

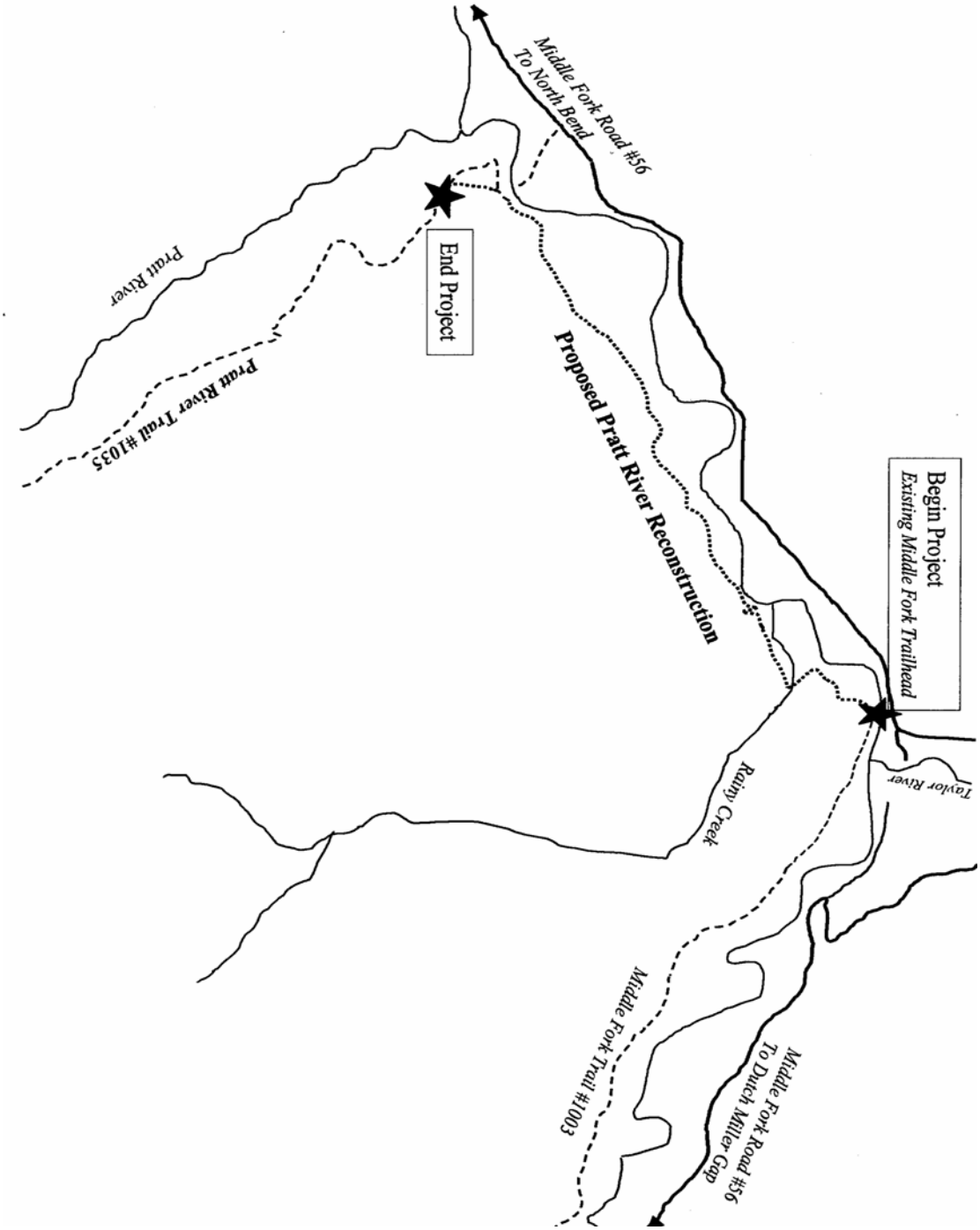
Forest Service Response: Land allocations from the LRMP, as amended, were described in the EA and the deer and elk winter range (MA-14) is not in these allocations (EA pp.13-15). The EA acknowledges that deer and elk do occur in the watershed, and winter along the mainstem of the Middle Fork Snoqualmie, Pratt, and Taylor Rivers (EA p.60). Further, those lands along the Pratt River, just on the edge if this project area, are designated as "winter range" (Management Area 14) (Preferred Alternative Map, LMRP). Though this project may be on the edge of winter range, the standards and guidelines for MA-14 state: *"Concentrated recreational activities are permitted except where direct conflicts with winter range occurs"* (LMRP p. 4-231).As stated in the analysis: Both deer and elk are known to over-winter along the mainstem Middle Fork Snoqualmie River but mostly on private land (generally below the project area). Summering and fawning/calving occur in the Pratt, Taylor, and Quartz Creek drainages with some animals moving to the higher elevations in the

wilderness (EA p. 60). Under alternatives 2 and 3, clearing for the trail would involve removing brush 4 feet on either side of the trail tread and could equal up to 3 acres of clearing of brush and small trees (total) stretching over 3.25 miles of trail. The various species of brush could provide forage habitat and possibly some hiding cover however, since a narrow clearing corridor is spread out over such a long distance, impacts would be slight and would not be measurable at the scale of an animal's home range (EA p. 62).

Comment #12: The lower Pratt and adjacent areas provide a refuge for deer and elk where they are seldom hunted. Construction of a trail from the Taylor River area downstream to the Pratt, as proposed by the Forest Service would greatly increase access to the lower Pratt and adjacent areas, opening them up to increased hunting pressure and ending the areas' status as a defacto game reserve.

Forest Service Response: The EA acknowledges that uses would change (EA pp. 51 and 64-65). Further, as noted in the EA, hikers already use about 40 - 45% of the trail. The EA states: *"… consistent use of the first 1 – 1 ½ miles of the trail by the public have kept the tread open and fairly clear of brush"* (EA p. 10). Statistics are not available as to the number or type of users that currently hike the first 1 – 1 ½ mile of the Lower Pratt River Trail, however, it is probable that some of these users are hunters and that they already hunt big game in this portion of the Lower Pratt drainage.

Statistics are not available for trail use for the existing Lower Pratt River Trail (south of the Middle Fork Trailhead). However, statistics were gathered to determine use on the Middle Fork Trail, north towards Goldmyer Hot Springs. Use figures indicate that an average 15 users per day accessed the Middle Fork Trail from the Middle Fork Trailhead (EA p. 45). Using available statistics, it is estimated that currently, the Lower Pratt River use levels are low (1 to 500 users per year). Thus, once rebuilt, the use levels of the Lower Pratt River Trail could become high (500 to 3,000 users per year). This equates to approximately 3 to 15 users per day (EA p. 51). The commenter is correct; though no statistics are available, a certain percentage of these users would more than likely be hunters however, as stated, , impacts to deer and elk would be slight and would not be measurable at the scale of an animal's home range (EA p. 62).

Land allocations from the LRMP, as amended, were described in the EA (EA pp.13-15). None of the lands in the Middle Fork, Taylor River, and Pratt Rivers have been or are being considered for reserve status (including big game) (LMRP, preferred alternative map).

Appendix C: Lower Pratt River Trail Reconstruction and Partial Relocation Selected Alternative Map