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June 10, 2013

Peter Forbes District Ranger
Darrington Ranger District
1405 Emens Street
Darrington, WA 98241

RE: 2013 Proposed Projects on the Darrington District

Dear Mr. Forbes:

Wilderness Watch is providing these comments on the 2013 Proposed Projects on the Darrington District scoping document. Our comments are limited to the two projects that occur in Wilderness, USGS South Cascade Glacier Research Station and Pacific Crest National Scenic Trail Post Construction Maintenance. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. We have many members in the area, and been active on issues affecting the Glacier Peak Wilderness for more than two decades.

USGS South Cascade Glacier Research Station

We recognize this station has been operating since 1959, before passage of the Wilderness Act or designation of the Glacier Peak Wilderness. What is unclear is whether the operation of the station and the activities associated with it have ever been subjected to the requirements of NEPA or reviewed for their consistency with the Wilderness Act. The scoping letter indicates that operation of the station involves the use of aircraft, permanent structures, and various permanent installations. At a minimum the Forest Service should complete an environmental assessment (EA) to analyze the effects to the Wilderness from the station and, if issuance of a permit is deemed appropriate, ways to minimize the impact from operating the station on the surrounding Wilderness. The EA should also consider whether there are less impacting ways to collect any necessary data, and whether future technological changes and/or changed circumstances, such as the complete or substantial melting of the glacier, will likely make any remaining structures irrelevant at some point in time. Over the years we have heard many times from members who are concerned about the presence of this station, and especially the use of helicopters servicing the site.

The scoping letter indicates some “legacy” equipment will be removed from the site to reduce the station’s footprint. It does not indicate whether this equipment will be

removed in a traditional “wilderness way” by nonmotorized means, or whether the proposal is to remove the equipment with aircraft. If it is the latter, it seems an environmental assessment is required. This specific project should be analyzed independently of the 20-year permit, since removing the unnecessary equipment from Wilderness should be completed regardless of the long-term plans for the station.

Pacific Crest National Scenic Trail Post Construction Maintenance

We question the stated “purpose and need” for this project. The overarching mandate for this area is to preserve its wilderness character. Administering the Pacific Crest Trail must be done in a fashion that adheres to this standard. The proposed use of a helicopter and motorized equipment appears to fail the test.

There is nothing in the information provided that suggests the proposed trail improvements can’t be completed without motorized equipment or aircraft, merely that the way the FS has designed the project perhaps makes their use convenient. This suggests the project may need to be redesigned.

We are concerned that the scoping letter is misleading when it states that crews would have to walk 26 miles to the worksite. While the Suiattle Road might be closed to public use, FS administrative vehicles can utilize the route to the Wilderness boundary, approximately 15 miles from the site. We suspect pack stock can travel well beyond the trailhead, making the distance one would have to walk much less. In any event, trail crews in the Northern Rockies routinely travel 26 miles or more to work sites without the need for helicopters or other motor vehicles. The analysis should explain why trail crews wouldn’t be capable of walking to the site, or whether it can be reached by other routes.

We also understand road repairs are planned for the next year so that the walking or riding distance to the proposed work site will be substantially reduced. The FS should consider delaying the project until the roadwork is complete. The scoping letter suggests the trail damage occurred a decade ago. Why can’t repairs wait another year?

The scoping letter states there is no ability to utilize pack stock to transport tools and supplies to the work site. Is this because of trail conditions or because the agency lacks the skills or the stock to do the work? If it is the former, then it seems the trail work should start at the point the trail becomes impassable and continue to the proposed work site, utilizing pack stock support along the way. If it is the latter, the FS should work with other FS units to acquire the necessary stock and skills to do its wilderness stewardship job.

We also question the need to use a power drill. Hand-held star drills and sledgehammers are the typical, traditional way to complete projects in Wilderness. The rationale for power drills is usually that it takes less time, even though FS policy is clear this isn’t an appropriate standard for Wilderness. The policy states, “Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations” (FSM 2320.3.1). The Wilderness Management Model adds, “Economy, convenience, commercial value, and comfort are not

standards of management or use of wilderness.” (FSM 2320.6). The use of a helicopter and motorized equipment is contrary to both of these policy goals.

Gauging by the number of proposals from the Darrington District to use helicopters and motorized equipment in Wilderness suggests to us the District may lack the skills, knowledge, or equipment to properly administer Wilderness. We strongly urge you to contact the FS’ Missoula Technology and Development Center for assistance in designing and implementing projects in Wilderness, such as this trail project, without the use of aircraft or motorized equipment. The Center specializes in designing such projects and has access to FS traditional skills experts who can aid in both design and implementation. We encourage you to contract with the Center for assistance.

The scoping letter states this project is a continuation of work done under a six-year-old decision memo. Did that decision memo specifically authorize the trail work, helicopter, and motorized equipment use proposed by this project? Since the Forest Service has determined helicopter use for accessing the Green Mountain lookout, also in the Glacier Peak Wilderness, requires an EIS, it seems the level of analysis for this project, which apparently involves much more motorized use and environmental impacts, would also rise to an EIS. At a minimum, the Forest Service should prepare an EA to make the determination of significance.

Please keep Wilderness Watch informed on these projects. Feel free to contact me should you have any questions about our comments.

Sincerely,

A handwritten signature in black ink that reads "George Nickas". The signature is written in a cursive, flowing style.

George Nickas
Executive Director