



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
3537 NE 87th St.
Seattle, WA 98115
okeefe@americanwhitewater.org

October 26th, 2012

Joseph Neal, District Ranger
Skykomish Ranger District
Mt. Baker – Snoqualmie National Forest
P.O. Box 305
Skykomish, WA 98288

RE: Forest Road 6122 Recreational Access to the Sultan River, as part of the Henry M. Jackson Hydroelectric Project (FERC P-2157)

Dear District Ranger Neal:

American Whitewater is pleased to learn that planning is well underway for the project to formalize recreational access to the Sultan River below Culmback Dam as outlined in our Settlement Agreement and the recently issued license for the Henry M. Jackson Hydroelectric Project, FERC P-2157 (Jackson Project). We fully support the Proposed Action as consistent with the comprehensive Settlement Agreement between American Whitewater, Public Utilities District No 1 of Snohomish County, USDA Forest Service, and other parties.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5500 members and 100 local-based affiliate clubs, representing thousands of whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the Sultan River. A significant percentage of American Whitewater members reside in Washington State—a short driving distance from this river for recreation.

Whitewater kayaking on the Sultan River has occurred since the mid-1970's, prior to construction of Phase II of the Jackson Project and expansion of Culmback Dam. Despite requests for mitigation for the impacts of the Jackson Project on whitewater recreation dating back to 1980, outstanding issues were not resolved until the signing of a comprehensive Settlement Agreement in October 2009 for the Jackson Project. The agreement included provisions for public access to the river, restored flows for recreational and other purposes, and improved information on project operations to enable the whitewater paddling community to take advantage of the flows.

Comments in Support of Proposed Action

The Sultan River Canyon Trail was identified as a necessary mitigation measure and a key component of the Settlement Agreement to address recreation needs at the Jackson Project. At

one time, paddlers could drive FR 6122 to the river and an access point at the old stringer bridge. A series of landslides and a lack of maintenance on FR 6122 over the past three decades has effectively resulted in the loss of convenient public access to the river. As this historic access deteriorated, miners and whitewater kayakers created a new path to the river that resulted in environmental concerns and social conflicts and did not meet Forest Service trail standards. Stakeholders in the relicensing proceeding determined that a multi-purpose public access trail to the Sultan River and Sultan River Canyon would effectively meet recreational goals of the Jackson Project and be in the public interest. This measure, along with others in the Settlement Agreement, was evaluated under the National Environmental Policy Act through an Environmental Assessment and subsequent License Order issued by the Federal Energy Regulatory Commission.

We understand that the Proposed Action under review for a Categorical Exclusion includes the installation of two relief culverts on FR 6122 and the removal of 6100 cubic yards of fill from the two culvert locations. We support these activities as consistent with the overall project to construct the Sultan River Canyon Trail, which has already been extensively reviewed as part of the hydropower licensing proceeding.

Conclusion

Thank you again for the opportunity to provide comments on this project. We fully support the Proposed Action and look forward to the beginning of the trail construction planned for 2013. If you have any questions regarding our interest in this manner please do not hesitate to contact me. We would welcome any opportunity for a site visit prior to or during construction.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a stylized flourish at the end.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director