

October 31, 2008

Palmer (Chip) Jenkins, Superintendent
North Cascades National Park Service Complex
810 State Route 20
Sedro Woolley, WA 98284-1239

RE: Ross Lake National Recreation Area General Management Plan

Dear Superintendent Jenkins:

On behalf of American Whitewater and our affiliate clubs in Western Washington I am writing to provide our input on the Skagit Wild and Scenic River Eligibility and Suitability Studies as part of the Ross Lake National Recreation Area General Management Plan. We wish to express our appreciation for all the work you and your staff have invested in this planning effort to date and thank you for your commitment to conduct a suitability evaluation of the Skagit River and Goodell Creek.

We strongly support Wild and Scenic River designation of the Skagit River from the Gorge powerhouse to the National Recreation Area (NRA) boundary, and Goodell Creek from its headwaters to its mouth. This reach of the Skagit and Goodell Creek are exceptional and deserve permanent protection from future water development and other harmful projects that could impair their free-flowing character, outstanding values, or water quality. As part of the Ross Lake General Management Plan, we concur with the preliminary conclusions that the Skagit River be recommended for inclusion in the national Wild and Scenic Rivers system.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,000 members and 100 local-based affiliate clubs, representing approximately 80,000 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. Founding principles of our organization include protection of the wilderness character of waterways and promotion of the recreational value of wilderness rivers.

As a conservation-oriented paddling organization, American Whitewater has an interest in the rivers of the Skagit River watershed including several within the Ross Lake National Recreation Area enjoyed for the whitewater recreational opportunities they provide including Lightning Creek, Ruby Creek, Thunder Creek, Skagit River, Stetattle Creek, and Little Beaver Creek. A significant percentage of American Whitewater members reside in the Pacific Northwest and regularly take advantage of the opportunities for wilderness exploration that the Park offers. While the recreational

opportunities are important, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and ecologically important riparian forests. For our members the river systems and associated riparian zones represent defining landscape features of the Park that are highly valued by our membership and the general public.

Findings of the Draft Wild and Scenic Eligibility Study

Based on the National Park Service preliminary findings, the Skagit River from Gorge Powerhouse to Ross Lake National Recreation Area Boundary and Goodell Creek from the headwaters to the Skagit River were found to be eligible for Wild and Scenic designation. We concur with the finding that fishery resources, wildlife, geology, and pre-history are all outstanding remarkable values for the Skagit River with scenery added as an outstanding remarkable value for Goodell Creek. We agree with the preliminary assessment that the quality of these resources qualifies the river for designation under the Wild and Scenic Rivers Act. Several of our members have questioned why recreation and scenery were not included as outstanding remarkable values for the Skagit River and we believe this determination should be reevaluated.

Recreation

The Skagit River from Goodell Creek to Copper Creek is one of the highest quality recreational resources for river runners in the region for the experience that it provides for family-oriented recreation.¹ Interagency guidelines² state that for recreation to be considered an outstandingly remarkable value, “recreational opportunities are, or have the potential to be, popular enough to attract visitors from throughout or beyond the region of comparison or are unique or rare within the region. Visitors are willing to travel long distances to use the river resources for recreational purposes.”

This section of the Skagit River is popular enough to attract visitors from throughout the region and it is common to see visitors from across the country and around the world. Two elements of the river make it unique within the region—the intermediate level of whitewater difficulty that provides a thrilling ride through the S Bends without being overly challenging and the size of the river and consistent flows throughout the year. There are many rivers that provide more challenging whitewater in the region and rivers like the White Salmon or Wenatchee see higher use numbers by commercially-guided river runners, but the Skagit is popular for those seeking an introduction to rivers of the region. The river is the third largest river on the West Coast as measured by annual discharge and the consistent flows it provides through the summer provide a recreational opportunity during the summer when the majority of other rivers in the region are too low for rafting. For this reason the river does attract visitors during the summer vacation and tourist season when many travelers come to enjoy the Pacific Northwest.

Interagency guidelines also state that “interpretive opportunities may be exceptional and attract, or have the potential to attract, visitors from outside the region of comparison.”

¹ This section of the Skagit River is profiled in North, Douglass A. 1992. Washington Whitewater: The 34 Best Whitewater Rivers. Mountaineers, Seattle, WA.

² Diedrich, J. and C. Thomas. 1999. The Wild and Scenic Study Process. Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council.

The Skagit River offers unparalleled opportunities for interpretation of Pacific Northwest Rivers. Because of consistent flow, its intact riparian corridor, and the size of the river, the river has been used as a natural classroom.³

Interagency guidelines further state that rivers meeting the outstanding remarkable standard for recreation may provide, or have the potential to provide, settings for national or regional usage or competitive events.” With the abundance of rivers in our region, many paddlers who compete at the world-class level either got their start or make their home in the region, including current and past national team members and Olympic athletes from both the United States and Canada. The Skagit is known as a training run for National Team members and has been identified as a suitable site for international competition in the discipline of downriver racing.

An important reason to include recreation as an outstanding remarkable value is so that this unique and exemplary feature can be managed and protected for future generations. The National Park Service is directed to “provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks.”⁴ The Skagit River is clearly a superlative natural feature of the Park. Future actions that potentially degrade the outstanding opportunities for kayaking, rafting, and canoeing need to be managed appropriately. As one example, our members who use the river have expressed concern with conflicts associated with motorized craft that sometimes use this stretch of river. As engine power increases and new mechanized craft are developed, the potential exists for conflicts with the existing high value this resource provides for paddlesports recreation. Recognizing and protecting the existing recreational opportunities should be the goal of a future management plan, a goal that could be realized by recognizing recreation as the outstanding remarkable value that it is.

Scenery

The Skagit is the third largest river on the west coast after the Columbia and Sacramento and discharges approximately 13 million acre feet annually representing 20% of the freshwater to Puget Sound. The river is thus a large undeveloped river along the section from Goodell Creek to Copper Creek. Interagency guidelines⁵ state that for scenery to be considered an outstandingly remarkable value, “the landscape elements of landform, vegetation, water, color, and related factors result in notable or exemplary visual features and/or attractions.” Two particularly outstanding attributes of the Skagit River are the clear water and the intact riparian forest. While there are many scenic rivers in the Cascades, what makes the Skagit unique among rivers in the region is the fact that few large rivers anywhere in the world have an intact riparian corridor comparable to the undeveloped shorelines of the Skagit River. This is an outstanding and unique feature of this river that should be protected. In their book *Western Whitewater*, Cassidy et al. state, “...the wet climate produces a forest so dense and lush that nearby roads and buildings are often invisible from the river. Above the wall of green is a primordial world of fire

³ As one example the University of Washington’s River Ecology Course (FISH/ESC 547) conducts an annual field trip on the river <<http://www.fish.washington.edu/classes/fish547/>>. Visiting research scientists from around the world have also attended field trips to experience this section of the Skagit River which offers exceptional interpretive and educational opportunities.

⁴ 2006 NPS Management Policies at page 157.

⁵ Diedrich, J. and C. Thomas. 1999. *The Wild and Scenic Study Process*. Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council.

and ice: lofty volcanoes capped by blue-white glaciers and wreathed in shreds of cloud.”⁶ At a few points along the river power lines from the Skagit Hydroelectric Project and Highway 20 are visible but they have a minimal impact on the scenic character of the river corridor. The Skagit River also has exceptionally clear water and is one of the only large river systems where one can easily observe large salmon migrating upstream and choosing and defending nesting sites in a large river system. While there are other places where salmon behavior can be observed on smaller tributary streams the exemplary visual features of the Skagit River and its water clarity provide a unique and rare opportunity to observe salmon on a large river system.

An important reason to include scenery as an outstandingly remarkable value is so that this unique and exemplary feature can be managed and protected for future generations. Projects or development that could impact the scenic and visual attributes of the river and the riparian corridor through which it flows should address and consider any impacts to the scenic landscape. Currently the Skagit Wild and Scenic River system managed by the US Forest Service includes scenery as an outstandingly remarkable value and the management plan states, “the visual characteristics of the corridor will be a key factor in management of the river system.”⁷ This same standard should be applied to the section of the river that flows through the Ross Lake NRA.

Benefits of Wild and Scenic Designation

American Whitewater fully supports designation of this section of the Skagit River as Wild and Scenic. This section of river has been proposed for hydropower development in the past when Seattle City Light pushed for construction of the 108 MW hydropower project at Copper Creek that would have inundated this reach (Federal Energy Regulatory Commission Project 2795). The site is published as a potential site on the Idaho National Laboratory’s Washington State Resource Assessment report⁸ In consideration of the resource values of the river in its free-flowing state, environmental groups, fishermen, whitewater boaters, and tribes, were successful in preventing hydropower development when the Seattle City Council decided to shelve the project in August 1981. However, the site continues to be identified as a potential site on the Idaho National Laboratory state list that is routinely cited as a source of sites available for future development. Among the strongest protections afforded by the Wild and Scenic Rivers Act⁹ is Section 7 which prevents the construction of any dam, reservoir, or other project works on a Wild and Scenic River. Designation of this section would recognize the values of the river in its current undeveloped state and protect those values from any future hydropower proposal.

Designation of this section of river will also eliminate confusion over management of this section. Most individuals who visit the river and many agency staff believe that this section is already designated as Wild and Scenic. In fact the National Park Service publishes a fact sheet for river runners that includes guidelines and safety tips for running the section of the Skagit River within the NRA titled “Running the Wild and Scenic Skagit River” that is distributed at the North Cascades National Park Visitor Center.

The river would benefit from a management plan that would protect and enhance the resource values of this river. Potential needs for improvements to river access at NPS Road 213 (Highway 20 mile 111.7) might be considered. We also believe that a proactive

⁶ at page 502, Cassady, J., B. Cross, and F. Calhoun. 1994. Western Whitewater from the Rockies to the Pacific. North Fork Press. Berkeley, CA.

⁷ At page 39, River Management Analysis Skagit River, Volume 1. USDA Forest Service. 1983.

⁸ http://hydropower.inl.gov/resourceassessment/app_d/index_states.shtml?wa15

⁹ 16 U.S.C. 1271-1287

management plan should be developed to protect the high quality opportunities for paddlesports on this section of river including any potential conflicts with expansion of motorized use of this section.

Other Eligible Sections Within the North Cascades National Park

The Draft Eligibility report notes that a previous study of Big Beaver Creek, Ruby Creek, Granite Creek, Canyon Creek, Thunder Creek, Fisher Creek, Chilliwack River, Stehekin River, Agnes Creek, Bridge Creek, North Fork Nooksack, and Baker River determined these rivers to be eligible for Wild and Scenic designation. The previous review of these rivers was published as a National Park Service memo in 1989 which describes general setting, eligibility determination including evaluation of potential outstandingly remarkable values, and basic characteristics of the river reach. This memo is difficult for the public and agency staff to locate, yet the findings have implications for river management and serve as the basis for future suitability studies.

Under the Wild and Scenic Rivers Act, the National Park Service is required to study rivers for eligibility in the national system as part of developing a GMP.¹⁰ National Park Service management policies specifically state that “Potential national wild and scenic rivers will be considered in planning for the use and development of water and related land resources. The service will compile a complete listing of all rivers and river segments in the national park system that it considers eligible for the National Wild and Scenic Rivers System.”¹¹ We understand that current resources will not permit a complete review of these findings, however to facilitate public knowledge of this past effort we request that the findings be republished as part of this planning effort in a format where they can be fully indexed, searched, and reviewed by the public. We also request that the National Park Service include a recommendation in the General Management Plan to conduct an updated eligibility analysis and suitability analysis for these other rivers.

Conclusion

The Skagit River is clearly a superlative natural feature of the North Cascades National Park, which is unique for the diversity of opportunities for exploring wild free-flowing rivers in the conterminous United States. Exploring the Park’s rivers by hand-powered craft affords visitors with a unique opportunity to experience park resources, promotes enjoyment of the river and riparian landscape, contributes to health and personal fitness of park visitors, and provides inspirational opportunities to experience wild rivers. We thank you for the opportunity to provide comment and look forward to working with you and your staff as the planning process continues.

¹⁰ Section 5(d)(1) of the Wild and Scenic River Act states: “In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved.”

¹¹ 2006 NPS Management Policies at Section 2.3.1.9

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a long horizontal stroke extending to the right.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

cc:

Washington Kayak Club
P.O. Box 24264
Seattle, WA 98124

Paddle Trails Canoe Club
P.O. Box 24932
Seattle, WA 98124

University Kayak Club
University of Washington
Campus Box 354090
Seattle, WA 98195

Washington Recreational River Runners
330 SW 43rd St., Suite K, PMB# 501
Renton, WA 98055