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December 14, 2007

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 express our interest in the development of the Ross Lake National Recreation Area General Management Plan (GMP). While we recognize that the formal scoping period has passed we note that this planning process is still in the early phase of development. We request that you consider our comments as you continue the process of developing and evaluating preliminary alternatives. We look forward to providing more detailed comments as the process continues and request that we be placed on the mailing list for future updates and opportunities to provide comment.

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: Lightning Creek, Ruby Creek, Thunder Creek, Skagit River, Stetattle Creek, and Big 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 incredible riparian forests. For our members the river systems and associated riparian zones are thus defining landscape features of the Park that are highly valued by our membership and the general public.

Our members regularly take advantage of opportunities to explore the wilderness rivers of the Park. National Park Service guidelines note that "appropriate visitor enjoyment is

often associated with inspirational qualities of the parks” and “preferred forms of enjoyment are those that are uniquely suited to the superlative natural and cultural resources found in the parks.”¹ The rivers are clearly a superlative natural feature of the Park, which is unique for the diversity of wilderness river opportunities 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. While some rivers such as the Skagit are well-known classics and support commercial outfitters, the wilderness setting and diversity of rivers in the Park allows individuals to find solitude and explore areas of the Park where one can find new adventures and rivers to explore. Individuals have a unique opportunity to experience the sense of adventure akin to that of those who explored the North Cascades prior to the creation of the Park. Paddlers who have explored wilderness whitewater on Lightening Creek, Thunder Creek, and Big Beaver Creek for example regard the Park as one of the “last frontiers” for wilderness river exploration in the Pacific Northwest. We have a strong interest in preserving these opportunities for the future.

Wild and Scenic Rivers

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.² 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.”³ It is important to conduct this review and update information on eligibility as part of GMP development.

Conclusion

Thank you for the opportunity to provide comment. We look forward to working with you and your staff as this process continues and request that American Whitewater be placed on the mailing list for the GMP and all planning efforts that have an impact on the rivers of the North Cascades National Park Complex.

¹ 2006 NPS Management Policies at Section 1.5

² 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.”

³ 2006 NPS Management Policies at Section 2.3.1.9

Sincerely,



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Pacific Northwest Stewardship Director

cc:

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