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October 3<sup>rd</sup>, 2014

Joseph Neal Skykomish District Ranger 74920 N.E. Stevens Pass Highway P.O. Box 305 Skykomish, WA 98288

RE: Comments on Alpine Falls Trail Project Scoping Letter

Dear District Ranger Neal:

American Whitewater writes to express our support for development and construction of a day-use site at Alpine Falls on the Tye River as proposed in your recent scoping notice. We concur with the need to provide additional day-use recreational opportunities within the Stevens Pass Greenway along State Highway 2 and agree that Alpine Falls is an exemplary scenic feature.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5500 individual members and 100 local-based affiliate clubs, representing 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 Tye River that supports whitewater recreation. A significant percentage of American Whitewater members reside in the greater Puget Sound Region—a short driving distance from this river for recreation.

The Tye River is an important resource for the whitewater paddling community and has been found suitable and recommend for designation under the Wild and Scenic Rivers Act. The basis for this recommendation was the river's free flow and the outstandingly remarkable values that include scenic, recreation, fisheries, and wildlife. For kayakers, Alpine Falls represents the dividing point between the upper and lower runs.

Paddlers running the Upper Tye put in above the Deception Creek, paddle through a series of steep cascades and bedrock gorges, and end their trip at the Highway 2 bridge just upstream of Alpine Falls.<sup>2</sup> In our survey of over 150 whitewater runs in the North Cascades, the Upper Tye ranked second among all other runs based on the quality of whitewater, scoring 4.82 on a 5-

<sup>&</sup>lt;sup>1</sup> At ROD-24, Record of Decision Land and Resource Management Plan, Mt. Baker-Snoqualmie National Forest. USDA Forest Service, Pacific Northwest Region. June 1990.

http://www.americanwhitewater.org/content/River/detail/id/3406/

point scale. <sup>3</sup> The Lower Tye begins at the base of Alpine Falls with access available from a social trail from the pull-out to the base of the falls. <sup>4</sup> This run scored 4.30 on a 5 point scale for the overall quality of the whitewater. <sup>5</sup> Individuals have kayaked Alpine Falls, but it is a challenging rapid run by only a handful of the most experienced kayakers.

American Whitewater strongly supports the proposal to develop the pull-out at Alpine Falls as a recreation site. We have two primary issues we wish to highlight:

- 1) From the map published with the scoping notice, it is difficult to determine if contact access to the water will be available. Kayakers need to be able to exit the water above Alpine Falls and enter the water below Alpine Falls. We request an opportunity to participate in a site visit to view the site and discuss our existing use of the river. It may be appropriate to provide access for kayakers at another site to separate our activity from general day use, but any alternatives need to be evaluated and we wish to discuss these in more detail in the field before a Decision Notice is issued.
- 2) We support the installation of a vault toilet and believe that sanitation is essential for highuse day-use areas in close proximity to rivers. However, we have concerns with the implications for long-term access to the site. As you are aware, there have been ongoing issues regarding maintenance responsibilities for the recreation site at Deception Falls. The site has been closed at times and an important public recreation site has been unavailable to the public. Our members use the river during a time that many resource managers consider to be the shoulder seasons for recreation—in the fall and early spring. We do not want to see the site at Alpine Falls developed to a level that the site must be closed during periods of low use or when funds are not available for maintenance. We request that you evaluate how maintenance needs will be met and make a commitment to accommodate recreational use outside the high-use summer season in your Decision Notice.

Thank you for the opportunity to comment on this project and we look forward to additional collaboration and dialogue as you move forward. The need to provide for more outdoor recreational opportunities in places close to the Seattle metropolitan area is critical and we believe this project complements many ongoing efforts in the Stevens Pass Greenway.

Sincerely,

Thomas O'Keefe, PhD

Pacific Northwest Stewardship Director

<sup>&</sup>lt;sup>3</sup> Whitewater Paddling in the North Cascades, American Whitewater

<sup>&</sup>lt;a href="http://www.americanwhitewater.org/content/Document/view/documentid/554/">http://www.americanwhitewater.org/content/Document/view/documentid/554/>

<sup>&</sup>lt;sup>4</sup> http://www.americanwhitewater.org/content/River/detail/id/2257

<sup>&</sup>lt;sup>5</sup> Whitewater Paddling in the North Cascades, American Whitewater

<sup>&</sup>lt;a href="http://www.americanwhitewater.org/content/Document/view/documentid/554/">http://www.americanwhitewater.org/content/Document/view/documentid/554/>