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RE: Comments on Forest Plan Revision Okanogan-Wenatchee National Forest

Dear Margaret,

Thank you for the opportunity to comment on the Okanogan-Wenatchee Forest Plan Revision Proposed Action. We applaud the Forest Service for acknowledging that changed circumstances since the 1989 Okanogan National Forest Plan and 1990 Wenatchee National Forest Plan justify including new river segments as eligible for designation under the Wild and Scenic Rivers Act (WSRA). We couldn't be more pleased that the Forest Service has identified additional segments as eligible for Wild and Scenic River designation and in particular the rivers and creeks most highly valued by our community for the truly world-class whitewater opportunities they provide. We provide additional comments below regarding public access to rivers and the value of specific rivers for whitewater recreation.

### **Interest of American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have approximately 6000 individual members and 100 local-based affiliate clubs, including several in Washington State, 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 rivers throughout the Okanogan-Wenatchee National Forests and the recreational opportunities they provide. A significant percentage of American Whitewater members reside in Washington, Oregon, Idaho, and British Columbia who regularly take advantage of the opportunities these Forests provide for whitewater paddling. In addition, paddlers from across the country regularly visit these rivers for the quantity and diversity of paddling opportunities each spring that make the eastern slopes of the Cascades a world-class paddling destination.

## **General Comments**

The discussion of National Visitor Use Monitoring, while providing insight on many activities on the Forest, largely fails to capture the recreational value and use of creeks and rivers for whitewater paddling. One of the big changes we have noticed over the last twenty years corresponding to the time since the current Forest Plan was developed is the increased interest in creek boating. We have observed that many Forest Service staff are more familiar with traditional river running as it occurs on rivers like the Wenatchee but creeking involves paddling down steep gradients, in narrow channels, often dropping over waterfalls and finessing moves over or around rocks and has been largely unrecognized in recent project level planning. Some of the best known runs recently ranked by our members as “outstanding whitewater rivers” of the North Cascades include the Cle Elum River, Cooper River, Entiat River, Icicle Creek, Lost River, and Nason Creek.<sup>1</sup>

## **Public Access to Rivers**

As we have witnessed increased interest and use of rivers on this Forest over the past decade, we have recognized that facilities are often not well matched to the interests of whitewater kayakers and other day-use activities that are enhanced by contact access to the water. For example, trailheads that provide critical river access and require a Northwest Forest Pass like those on Icicle Creek and the Cooper River do not have designated pathways to the river. Campgrounds that provide access on rivers like the Naches have no public day-use access to the river requiring users to cross through individual campsites and develop creative approaches to parking. Campgrounds that provide access to rivers that run at ideal flows before the traditional camping season, such as Lake Creek Campground on the Little Wenatchee, are often closed or otherwise inaccessible. In general, day use sites, trailheads and campgrounds along rivers need to be designed and managed to serve river-based recreation. These developed sites provide critical access points, sanitation, and parking but are often not managed or maintained in a manner that facilitates the needs of whitewater paddlers or others desiring contact access to the water for day-use activities. While the Proposed Action identifies access needs on the Cooper River, Icicle Creek, and Wenatchee River, we believe there are additional opportunities to improve contact access to the water for day use.

We provide specific comments organized by ranger district on developed sites that provide important access along rivers below. There are many other access points that are utilized by paddlers on the Okanogan-Wenatchee National Forest that are not developed sites. A complete list of whitewater resources on these

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<sup>1</sup> American Whitewater recently completed a survey of whitewater resources of the North Cascades that includes rivers on the Okanogan-Wenatchee National Forest. The results of the survey that quantified the value of particular rivers and creeks for whitewater recreation can be viewed at <<http://www.americanwhitewater.org/content/Document/view/documentid/554/>>

Forests is available through our website where Google Maps of individual rivers are available as well as a downloadable kml file of put-in and take-out points that can be viewed with Google Earth.<sup>2</sup> Our view is that despite the world-class paddling opportunities available on this Forest, the needs of whitewater paddling are generally not recognized and we hope to see these needs considered in future planning efforts. The Forest Plan is the appropriate means of providing this necessary guidance for future project level planning.

The detailed inventory of access points utilized by whitewater paddlers is organized below by Ranger District. While the individual projects necessary to provide contact access to the river for day use may be beyond the scope of the Forest Plan, we would like to see general direction to address this need when projects along rivers occur including construction or reconstruction of bridges and future modifications to layout of campgrounds and trailheads.

### *Detailed Comments by Ranger District*

#### Okanogan National Forest, Methow Valley Ranger District

- Camp 4 on the Chewuch River is used as put-in for the Camp Four to Five Mile Bridge run and the Andrews Creek to Camp 4 run on Chewuch.
- River Bend Campground is used as the uppermost access for the Methow River.
- Andrews Creek Trailhead is used as the put-in for the Andrews Creek to Camp 4 run on the Chewuch River.
- Billy Goat Trailhead is used as the start of the hike into the Lost River, one of the most remote backcountry kayak runs in the region that starts below the confluence of Drake Creek and continues down to the Methow River. The hike in to this river begins on the 477 trail and continues down the unmaintained 459 trail along Drake Creek to its confluence with the Lost River. It would be helpful to have a bivouac site at this trailhead or in close proximity for those who come in late but want to get an early start on the trail first thing in the morning.

#### Wenatchee National Forest, Entiat Ranger District

- Cottonwood Campground provides a put-in access for the Cottonwood Campground to FR 5605 run on the Entiat River.
- Lake Creek Campground provides a put-in access for the Lake Creek Campground to Forest Service boundary run on the Entiat River.

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<sup>2</sup> A list of all rivers in Washington State with whitewater resources including those of the Okanogan and Wenatchee National Forests can be found at [http://www.americanwhitewater.org/content/River\\_state-summary\\_state\\_WA\\_](http://www.americanwhitewater.org/content/River_state-summary_state_WA_). Links to individual river reaches provide basic descriptions, photos, gauge levels, and Google maps with access points. A kml file with all these rivers that can be viewed with Google Earth can be downloaded from [http://www.americanwhitewater.org/content/River\\_state-summary\\_state\\_WA\\_.kml](http://www.americanwhitewater.org/content/River_state-summary_state_WA_.kml)

## Wenatchee National Forest, Wenatchee River Ranger District

- Snow Creek Trailhead provides parking and facilities for the take-out on the Ida Creek to Snow Creek Falls run and the put-in for the Snow Creek Falls to Fish Hatchery run on Icicle Creek. Access from the parking area down to the river at the base of Snow Creek Falls is generally poor and no designated pathway is provided. Given that a Northwest Forest Pass is required for this site there is an expectation that a higher level of service should be provided. We are pleased to see that the Proposed Action recognizes this need.
- Rock Island (FR 76 mile 16.5), Ida Creek (FR 76 mile 13.2), Johnny Creek (FR 76 mile 11.0), Bridge Creek (FR 76 mile 8.4) and Eightmile (FR 76 mile 7) all provide river access although reasonable access is available to the river in the general vicinity of these sites such that there is limited user conflict between campers and day users. Primary access issues are in Section 27, 28, and 29 where some of the most challenging rapids on the run occur requiring users to scout from shore, portage, and in some cases take off the river. There is considerable demand for more public access at key locations along the river in these sections.
- Tumwater Campground (identified as a site with a need for river access in the Proposed Action) provides take-out access for the Lake Wenatchee to Tumwater Campground run and may be used as a put-in for runs that continue downstream through Tumwater Canyon.
- Swiftwater Picnic Area is one of the most popular put-in points for those who wish to experience the challenging whitewater of Tumwater Canyon. While this site provides a good put-in, take-out facilities are generally limited. Many wish to take-out above Last Exit, the major rapid visible from mile 98.5 on Highway 2. In addition many want to put-in just below this rapid and access does not serve the current need.
- Huckleberry Campground provides a put-in for the Schaefer Creek to Huckleberry Campground run and a take-out for the Huckleberry Campground to Wenatchee River run on the Chiwawa River.
- Lake Creek Campground is the take-out for one of the most popular creeking runs in the Wenatchee National Forest. Unfortunately access to this campground is often closed by a gate during spring when flows are at an ideal level. At times this gate has been closed when the pavement is clear and apparently dry for a considerable distance past the gate. We would like to see earlier access to this campground as whitewater boating opportunities on this river typically occur before the summer camping season by which time flows are too low.

## Wenatchee National Forest, Cle Elum Ranger District

- Salmon La Sac Campground is an example of an excellent site where overnight camping and day users are both well served. Parking for day

use is provided and access to the Cle Elum River is convenient on the upstream river right side of the bridge. This access serves as a put-in for the run down to the FR 4308 Bridge. It also serves as a take-out for the China Gorge Run that starts at Davis Peak Trailhead or points upstream as far as Scatter Creek.

- Davis Peak Trailhead provides a put-in access for the China Gorge run on the Cle Elum River which continues down to Salmon La Sac Campground.
- Winston Crossing provides one of the only public access sites to the Lower Cle Elum River below the dam. As such it is critical that this site remains in public ownership and continues to provide public access to the river.
- Kachess Campground is the take-out for the Box Canyon Creek run that starts where FR 4930 runs along the creek and continues down to the campground.
- Salmon La Sac Trailhead provides a take-out access for the Cooper River. Out of over 100 whitewater rivers in the North Cascades the Cooper River was rated as one of the top five runs in a survey of our membership. Currently there is no designated access to the river from this trailhead although this need is identified in the Proposed Action. Given that a Northwest Forest Pass is required for this site there is an expectation that a higher level of service should be provided. This site also provides facilities for the backcountry kayak run on Waptus Creek which is accessed by the 1310 trail. The put-in below the falls on the Cooper River is currently accessed by a well-used boater trail and we are pleased to see the need for improvements to this trail identified as a need in the Proposed Action.

#### Wenatchee National Forest, Naches Ranger District

- Lodgepole Campground provides access to the American River however this site is an example of one where no day use access to the river is provided. Paddlers have to pass through a campsite or access the river on the upstream river left side of the Highway 410 Bridge. This alternative site is often used for dispersed camping. Should future closure of this site be considered to limit dispersed camping then provisions for access to the river for day users will become more important.
- Hell's Crossing Campground provides a put-in for the run from Hell's Crossing Campground to American Forks on the American River. Here again there is no good access to the river for day use as access is through individual campsites.
- American Forks Campground could serve as a take-out for the American River or a put-in for the run down the Bumping that continues onto the Naches. Most find the access at the bridge across the American off Highway 410 at mile 88.4 to be more convenient and it eliminates potential conflicts with campers although this alternative site sees a high level of dispersed camping.

- Little Naches Campground provides a take-out access for the Little Naches run and also an alternative put-in for runs that continue on downstream onto the Naches River. Access is problematic in this area as the narrow road and limited parking provide few alternatives to this campground. The campground itself provides insufficient access for day use with most sites occupied by overnight campers.
- Sawmill Flat Campground on the Naches River is one of the few examples in this drainage of a place where camping and day use access to the river are both provided. A picnic area serves the large community of users who have an interest in day use along the river and provides convenient access for whitewater kayakers. We wish to see greater implementation of this approach to site development along rivers.
- Cottonwood Campground is a popular take-out for the Naches River as the river leaves the National Forest a short distance downstream. However, parking and river access for day use are extremely limited. Using this campground as a take-out requires one to pass through individual campsites that can be very disruptive given the large group size this river tends to attract and the fact that rafts desire opportunities to enjoy this river. At least one campsite or area should be designated for day use.
- On the Tieton River, the most convenient put-in which is also used for commercial rafting is located at mile 166.3 along Highway 12. Bridges at Windy Point (mile 177.1 and mile 176.6 on Highway 12) provide popular access points utilized as take-outs. At the put-in we have received complaints from individual river runners who have been blocked in during the busy fall season. This site would benefit from improved parking management. We also have a continuing interest in how mitigation funds from the hydroelectric project on the Tieton Dam (FERC P-3701) will be used to meet the needs of river-based recreation.

### *Roads and Trails*

In the Proposed Action section dealing with Social Systems, the Forest Service states that “any National Forest System road, bridge, trail, or dock that is not needed to meet resource or social and economic objectives and/or user-created roads would be decommissioned and the landscape restored. The desired condition is to reduce miles of inventoried unauthorized roads, and minimize the development and proliferation of new unauthorized roads and trails.”

With respect to roads, we support the objective to eliminate unused and expensive parts of the Okanogan-Wenatchee National Forest system. We have actively supported the Legacy Roads and Trails Remediation Initiative and witness first-hand the impacts of unmanaged roads on water quality. However, there are currently many roads and trails used and highly valued by a variety of recreation groups including whitewater paddlers who must transport on the order of 100 pounds of gear for kayaks and 1000 pounds of gear for rafts from vehicles

to the river. While the Okanogan-Wenatchee National Forest is well known for rivers and creeks that provide high challenge backcountry trips requiring one to pack in boats and gear, the majority of river recreation occurs on rivers that have road access. In order to understand which roads should be retained and invested in, the Forest Service needs to develop a more complete geospatial inventory of access points along rivers—information that we can provide and that is currently available through our website.

With respect to trails, many rivers are accessed via a user-created pathway. Most of these are unplanned, often redundant social trails that have developed through repeated traffic, rather than through unauthorized construction. Regardless, in order to access a river paddlers often need to travel short distances off the road or trail network to reach river access points. The Proposed Action recognizes this for the Cooper River but no others. We support the objective of eliminating redundant and environmentally destructive social trails, but we do not support decommissioning all user-created trail access to popular paddling destinations (that we think will only widen impact). We suggest that as an objective of the Proposed Action, the Okanogan-Wenatchee National Forest work with our organization and our local affiliate clubs to identify and develop a single, sustainable system of trails to service popular paddling areas that builds upon the need identified for the Cooper River in the proposed action.

## **Wild and Scenic Rivers**

We couldn't be more pleased with the decision to recognize additional rivers as eligible for designation under the Wild and Scenic Rivers Act. We thank you for undertaking the comprehensive review of rivers on the Okanogan-Wenatchee National Forest. By separate comments filed jointly with other river conservation organizations, we have provided additional rivers for consideration. We highlight below the unique whitewater recreation value of several of the rivers and creeks identified as having outstandingly remarkable recreation values:

**Chewuch River:** With over 26 miles of whitewater, the Chewuch provides one of the longest continuous whitewater runs on the Okanogan-Wenatchee Forest during the spring snow melt season.

**Chiwawa River:** The Chiwawa has unique ledge features that provide outstanding playboating opportunities. For playboaters who enjoy runs like the lower Wenatchee outside the National Forest this river provides a rare opportunity to enjoy high quality play features in a forested and undeveloped setting.

**Cle Elum:** For over 50 years the Cle Elum River at Salmon La Sac has hosted a whitewater slalom competition, the longest continually running slalom event in the nation. The rapids on this river provide an ideal slalom site and the event attracts international caliber athletes and Olympians including members of the

U.S. and Canadian National Whitewater Teams. Upstream of the slalom site the river flows through the China Gorge a unique advanced whitewater run that can be safely run over an exceptionally wide range of flows from the peak of spring snow melt when many rivers are too high to mid-summer when other nearby runs are typically too low.

Icicle Creek: Icicle Creek is the most well known expert whitewater run in the Wenatchee drainage. For several decades, and long before other creek boating runs in the region were pioneered, the nation's top expert paddlers have recognized the unique opportunities this creek provides for a high challenge whitewater trip. Paddlers come from around the world to test their skills on this creek.

Wenatchee (Tumwater Canyon): With easy access and high visibility along Highway 2, Tumwater Canyon has long attracted the attention of whitewater paddlers. During the spring snow melt the bigwater character of this run attracts the nation's top expert paddlers who come to experience this unique high challenge trip. At flows of approximately 10,000 cfs, the power of the rapids on this run is unique to all but a few rivers throughout the Western United States and it is the only river of its type in Washington State. At more modest flows in late summer and early fall the river draws from a regional population of advanced paddlers who come to experience one of the few late season paddling opportunities in the region. During this time the rapids are characterized more by their technical nature than their power making this a river that provides a range of different types of experiences through the season.

Cooper River: Of all the rivers in the Wenatchee National Forest, we believe the Cooper is one of the most deserving of protection under the Wild and Scenic Rivers Act. Little known at the time the current Forest Plan was published, the river is now known as one of the most outstanding in the region. With advances in the sport of creek boating the unique opportunities this river provides are now widely recognized. This river is clearly a destination of regional and national significance for whitewater paddlers attracting visitors who are willing to travel long distances to use the river resources. It is known as great Class IV run that helps creek boaters build their skill set. The landscape elements of landform (deep bedrock canyons only accessible by kayak), vegetation (native forest), water (exceptional high water quality), color and related factors result in notable or exemplary visual features and/or attractions.

Little Wenatchee River: With the increase in creek boating since the last study of this river, the Little Wenatchee is clearly a destination of regional and national significance. It is one of the best Class IV runs in the area. Paddlers come from around the region and across the country to enjoy the resources that rivers in proximity to Leavenworth provide. In other words, the Little Wenatchee attracts visitors who are willing to travel long distances to use the river resources for recreational purposes. The landscape elements of landform (narrow bedrock



canyons), vegetation (patches of majestic old-growth trees along the river), water (exceptional high water quality), color and related factors result in notable or exemplary visual features and/or attractions.

Naches River: While not identified in the Proposed Action as eligible for Wild and Scenic designation, we believe this river does have outstandingly remarkable values for recreation. This river is unique in the region in providing a high quality recreational resource for beginner boaters and family-oriented recreation that has high scenic value. The river has long been a destination for paddlers from throughout the region. While there is a dam on the Bumping River, major tributaries including the Little Naches and American are unimpaired resulting in a flow regime on the Naches that largely mimics a natural hydrograph. Boating opportunities suitable for beginner boaters that flow through the National Forest on eastside rivers are comparatively rare, and the Naches provides one of the best float trips in the region to meet this need and one that is suitable for rafts.

Nason Creek: Due to its proximity to Highway 2, Nason Creek is accessible when other runs such as those on the Little Wenatchee or Icicle Creek may be inaccessible due to weather or road conditions in the spring. It is a high challenge Class IV/V whitewater run with the unique attribute of one highly continuous section of whitewater that extends over one mile. Many of the other creeks in the region are broken into much shorter sections of whitewater separated by pools and eddies. Nason Creek is thus unique in providing a read-and-run experience requiring paddlers to make fast real-time decisions as they paddle through the most challenging one mile section.

Rattlesnake Creek: As with some of the other rivers on this list, whitewater paddling was not assessed in the 1990 Forest Plan. While Rattlesnake Creek does not currently see heavy use it does provide an opportunity that is unique and rare within the region. Specifically this creek is one of the few easily accessible rivers in the region that does not have a road running along it. The significance is that paddlers have a unique opportunity for solitude in a remote river canyon and impacts from roads in the form of sediment delivery, blown culverts, etc. are greatly minimized in comparison to other rivers throughout the region. The basalt canyons are visually stunning and whitewater paddling affords a unique means of experiencing this environment.

Tieton River: As detailed in our joint comments with the river conservation community, we believe the decision to not analyze the Tieton River is inconsistent with Forest Service policy. While the river is impacted by Rimrock Dam, it is free-flowing, as defined by the Wild and Scenic Rivers Act, in the section below the dam. The fall drawdown of the reservoir provides an exceptional and highly valued recreational opportunity of regional significance making it the only river on the Okanogon-Wenatchee National Forest that supports commercial outfitters.

## Conclusion

We greatly appreciate the hard work Okanogon-Wenatchee National Forest staff have invested in recognizing the superlative and nationally-significant values of the rivers that originate on the Forest. The Proposed Action sets the stage for a revised Forest Plan that manages these rivers in a manner that protects and enhances their ecological and social values. By addressing both public access needs and conservation opportunities, we believe a new Forest Plan will provide appropriate guidance for the management of these rivers. Thank you for the opportunity to comment and we look forward to providing additional input as the draft Forest Plan is released to the public. Please include us on the mailing list for future opportunities to comment.

Sincerely,



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