

February 3rd, 2012

Tina Hokanson, Communications
Snohomish County Public Works
300 Rockefeller Ave., M/S 607
Everett, WA 98201

RE: Index-Galena Road Repair, Mile Post 6.4-6.9

Dear Ms. Hokanson:

We are pleased to learn that the NEPA process is underway for the repairs to the Index-Galena Road at mile post 6.4-6.9. We support the decision to analyze this project through an Environmental Assessment as we believe this will allow all issues to be fully considered and reviewed while providing a more robust defense to any concerns that may be raised regarding this project. We strongly support restoration of vehicle access along this river corridor in light of its regional importance for river-based recreation. The river is a State Scenic Waterway and has been recommended by the Forest Service for Wild and Scenic designation in part due to its significance as a recreational resource. With this status, there are important considerations with respect to construction projects that could impact river values, but we believe the project can be designed to protect and enhance the river-dependent values unique to the North Fork Skykomish River. We provide our detailed scoping comments below.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5000 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 North Fork Skykomish River. A significant percentage of American Whitewater members reside in Washington State—a short driving distance from this river for recreation.

Importance of the North Fork Skykomish for Whitewater Recreation

The high quality scenic values of the North Fork Skykomish River and the unique whitewater attributes of this run that are highly desired by intermediate to advanced paddlers distinguish this river as one of the region's best whitewater runs. The season for the river begins with fall rains in October, continues through the winter, and in most years extends into early summer as long as snow melt maintains elevated flows. In a survey of whitewater enthusiasts on Whitewater Paddling in the North Cascades,¹ American Whitewater found that the North Fork

¹ <http://www.americanwhitewater.org/content/Document/view/documentid/554/>

Skykomish was one of the most popular rivers in the North Cascades (41% of paddlers had done the run), it was rated as having outstanding recreational and aesthetic qualities of regional and national significance, and it was identified as one of the top five favorite runs out of 158 recognized whitewater runs in the North Cascades. In a study of River Recreation in Washington State, the National Park Service identified the North Fork Skykomish as having Grade A qualities for whitewater recreation.² The reputation of the river extends beyond the boundaries of the state and the river is well known to paddlers from across the country and around the world—in fact, it is one of two rivers in the state featured in the book *World Whitewater*,³ a guidebook to the world’s best whitewater.

The North Fork Skykomish was identified as a potential Wild and Scenic River in the Nationwide Rivers Inventory (NRI) published by the National Park Service in 1982. The Forest Service conducted a formal suitability review of the river for wild and scenic designation during the most recent forest planning process. As an outcome of that process, the river was recommended to Congress for designation as a National Wild and Scenic River for its scenic, recreation, fish, and wildlife values.⁴ The Forest Plan specifically notes that the North Fork Skykomish receives high recreation use, much of which “is oriented toward river activity” and that the river is one of Washington State’s most “continuously challenging whitewater rafting and kayaking runs, with 11 miles of class III or IV river.”⁵ The North Fork Skykomish River is currently part of the Washington State Scenic River System, the legislative purpose of which is to “protect and preserve the natural character of such rivers and fulfill other conservation purposes.”⁶ Rivers in the system “shall be preserved in as natural a condition as practical.”⁷

Access Considerations for the North Fork Skykomish

Since floods damaged the road in 2006, access to the river has been limited. Even those who have been willing to drive over Jack’s Pass have been deterred by the gate that does not allow the general public to proceed downstream to the desired access points that are between the gate and the two washouts at road mile 6.4 and 6.9. A small community of expert boaters runs the river above Bear Creek Falls, but most boaters put in below a rapid known as Drumbeater near North Fork Road mile 11.7 (47.8947, -121.393) located at the start of a short canyon reach approximately 0.5 miles upstream of the Troublesome Creek Bridge. This section from Drumbeater to Troublesome Creek Campground is known as one of the most scenic class IV river canyons in Western Washington. For those who do not wish to run the canyon, the next popular access point is at road mile 10.9 where the river closely parallels the road at a rapid

² River Recreation in Washington: An Initial Inventory and Assessment. National Park Service, Pacific Northwest Region and Washington State Parks and Recreation Commission. 1986.

³ Cassidy, J. and D. Dunlap. 1999. *World Whitewater: A Global Guide for River Runners*. Ragged Mountain Press.

⁴ Land Resource and Management Plan, Mt. Baker-Snoqualmie National Forest, Appendix E, June 1990.

⁵ At Page E-149 to E-156, Land Resource and Management Plan, Mt. Baker-Snoqualmie National Forest, Appendix E, June 1990.

⁶ Revised Code of Washington 79A.55.

⁷ Revised Code of Washington 79A.55.005

known as Rooster Tail. There is a short portage trail here for those who do not wish to run the rapid that is one of the more challenging drops on the river. Rafters often access the river at road mile 10.5 on the upstream side of the bridge. There are two primary access points downstream that are used for take-outs but can also serve as put-ins for those paddling down to Index. There is a pull-out along the river at road mile 6.9 on public land. A second access point is downstream at road mile 6.1 on private land (47.864, -121.487) at the Trout Creek confluence. Boaters often choose one of these two access points depending on permission of the land owner at Trout Creek, available parking, and the time available. The approved alignment appears to bypass the historic public access at road mile 6.9. While we support removal of the damaged road segments, we request that the project evaluate an alternative that includes a provision for retaining a short spur of the remaining road near mile 6.9 so it can continue to serve as public access to the river.

Now that road repairs have been completed at mile 10.5, 10.9, 11.9, 12.8, 13.1, and 13.8, we request that the gate be set in an open position or moved to mile 10.5 as soon as feasible and preferably by April 1st of this year so that kayakers and rafters can more easily utilize the various access points that can be reached by coming in from Jack's Pass. Our National Whitewater Inventory includes a complete description of the North Fork Skykomish and an interactive map that identifies the key features and access points utilized by the whitewater boating community.⁸

Conservation Value of the North Fork Skykomish

As a river identified as suitable for Wild and Scenic designation under the Wild and Scenic Rivers Act, the Forest Service Handbook provides management guidelines that must be used when carrying out projects and activities.⁹ Specifically the free-flowing character of the river must not be modified, the outstandingly remarkable values must be protected, and classification status must be maintained.

Our initial analysis of the proposed reroute from milepost 6.4 to 6.9 is that the project will be consistent with guidance for projects along a suitable wild and scenic river. Specifically, moving the road corridor out of the floodplain and channel migration zone will enhance the free-flowing character of the river. It will protect and enhance outstandingly remarkable values by enhancing the scenic experience from the river, restoring recreational access, protecting fishery values by removing a segment of road out of the floodplain, and protecting the river-dependent wildlife values by restoring floodplain habitat along the alignment of the old road. The project will have an impact on terrestrial resources but the opportunity to protect and enhance the river-dependent values is significant. This segment is along a section of the river identified for recreation classification and as stated in the Forest Service Handbook, "new roads and railroads

⁸ <http://www.americanwhitewater.org/content/River/detail/id/2212/>

⁹ FSH 1909.12, 82.5

are permitted to parallel the river if such construction fully protects river values (including river's free-flowing character)."¹⁰ We believe the proposed project can meet this standard.

We also believe the proposed action will be consistent with statutory requirements for conservation of the river under the State Scenic waterway designation. By moving the road out of the channel migration zone it will "protect and preserve the natural character of [the] river" and by allowing the river to more freely migrate within the floodplain it will serve to preserve the river in "as natural a condition as practical."¹¹ The scoping document notes that the State Scenic Waterway program has not been funded since 1993, and that no coordination with a responsible agency is required for approval under this law. While we concur that a program within Washington State Parks no longer exists, we believe the project can and should be completed in a manner consistent with state law and the management objectives outlined in RCW 79.72.

Conclusion

Thank you again for the opportunity to provide scoping comments on this project. We are pleased to see the NEPA analysis underway and support the current approach of conducting the analysis under an Environmental Assessment. We look forward to enjoying restored access to this river that has historically provided one of the most highly valued whitewater recreation opportunities in the state. We believe the project can be completed in a manner that restores the access and the unique river-dependent recreational values, while enhancing the scenic, fish, and wildlife benefits of pulling a segment of road out of the channel migration zone. The added benefit of this project will be a reduction in long-term maintenance costs. If you have any questions regarding the interests of whitewater recreation and the impacts of the project on our activity please do not hesitate to contact me.

Sincerely,



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

¹⁰ FSH 1909.12, 82.51.4c

¹¹ RCW 79.72