

January 2, 2008

Amy Tinderholt
Okanogan & Wenatchee National Forests
215 Melody Lane
Wenatchee, WA 98801
Email: okawen_rsfmp@fs.fed.us

RE: Comments on Whitewater Recreation and Recreation Facility Analysis for Okanogan and Wenatchee National Forests

Dear Amy,

Thank you for your past outreach efforts to our organization and our members on the development of the Recreation Facility Analysis (previously Recreation Site Facility Master Planning) for the Okanogan and Wenatchee National Forests. While we understand that initial public outreach has been completed and you are currently developing the 5-year proposed program of work for public review we wish to provide some comments we hope you will consider.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 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. As a conservation-oriented paddling organization, American Whitewater has an interest in the rivers throughout the Okanogan and 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

In materials you provided you note that visitor preferences and demographics have changed and that a number of recreation sites provide facilities or services that no longer meet visitor expectations or are not suited for projected future recreation demand. One of the big changes we have noticed over the last ten years 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. 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.

As we have witnessed increased interest and use of rivers on these Forests 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.

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 and Wenatchee National Forests that are not developed sites. A complete list of whitewater resources on these 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.¹ Our view is that despite the world-class paddling opportunities available on these Forests the needs of whitewater paddling are generally not recognized and we hope to see these needs considered in this and future planning efforts.

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.

¹ 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>. 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>

- 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.

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.
- 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 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 which 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 is not mentioned in the list of sites. It 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 by our membership. Currently there is no designated access to the river from this trailhead. 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.

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.

- 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 which 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.
- Tieton River Rafters is listed as a site for review. We are not clear where this site is located as we do not find it labeled on the Wenatchee National Forest map. In materials developed for future public review please provide clear indication of its location. 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. At the take-out at Windy Point we understand that bridges are scheduled for replacement. We formally supported acquisition of these parcels with the understanding that they would continue to provide public access. We also have an 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.

Conclusion

Our primary comment is that facilities along rivers that include trailheads, picnic areas, and campgrounds provide critical access points for whitewater recreation however many of these sites are not currently being managed to meet the needs of whitewater paddlers. Sites do not necessarily need to have areas specific to whitewater recreation but in modifying, managing, and designing sites along rivers attention should be given to this need and the broader need for contact access to the water. We wish to see more sites such as Salmon La Sac Campground on the Cle Elum River and Sawmill Flat Campground on the Naches River where access to the water is designed to be compatible with other uses. Thank you for the opportunity to comment and we look forward to providing additional

input as the draft proposal is released to the public. Please include us on the mailing list for future opportunities to comment.

Sincerely,



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

cc:

John Newcom, District Ranger
Methow Valley Ranger District
Okanogan National Forest
24 West Chewuch Road
Winthrop, WA 98862

Karin Whitehall, District Ranger
Entiat Ranger District
Wenatchee National Forest
2108 Entiat Way
P.O. Box 476
Entiat, WA 98822

Vaughn Marable, District Ranger
Wenatchee River Ranger District
Wenatchee National Forest
600 Sherbourne
Leavenworth, WA 98826

Rodney Smoldon, District Ranger
Cle Elum Ranger District
Wenatchee National Forest
803 West 2nd Street
Cle Elum, WA 98922

Randall Shepard, District Ranger
Naches Ranger District
Wenatchee National Forest
10237 Highway 12
Naches, WA 98937

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 Street, Suite K, PMB# 501
Renton, WA 98055

Seattle Raft and Kayak
7777 62nd Avenue NE, Suite 102
Seattle, WA 98115

Leavenworth Mountain Sports
220 Highway 2
Leavenworth, WA 98826

Outdoor Adventure Center
15143 NE 90th Street
Redmond, WA 98052