



Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
3537 NE 87th St.
Seattle, WA 98115
okeefe@americanwhitewater.org

September 23, 2022

Jody Weil, Forest Supervisor
Mt. Baker-Snoqualmie National Forest
2930 Wetmore Avenue, Suite 3A
Everett, Washington 98201.
Submitted Electronically to <sm.fs.mbsfeecomm@usda.gov>

Dear Forest Supervisor Weil:

American Whitewater submits these comments in response to the August 18th Notice of Proposed Changes to Recreation Fees Identified by the Mt. Baker-Snoqualmie National Forest. Our specific comments are on the proposed \$5 fee for the Cable Drop Boat Launch, Marblemount Boat Launch, and Sauk Boat Launch. We question whether these sites are developed to a level that would justify the Standard Amenity Recreation Fee as defined at 16 USC §6802(f)(4) and support retaining them as no-fee sites. We also request that you review federal investment for these sites to determine if they meet the standard of “substantial federal investment” under 16 USC §6802(f)(4)(B).

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,000 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates.

Cable Drop Boat Launch

Cable Drop Boat Launch saw increased use following the closure of Washington Department of Fish and Wildlife lands at Sunset Falls to public use and access in summer 2000. Following that closure American Whitewater initiated dialogue with the Skykomish Ranger District to formalize the existing social trail at Cable Drop through correspondence and discussions in 2003. Working with the Forest Service we jointly developed a plan in 2012 to improve the existing gravel parking area, rehabilitated an existing social trail that followed a drainage ditch and had resource degradation issues, and widened an existing trail to 5 feet and improved it by installing a set of cedar rails on wood posts for boaters to slide their rafts to the launch site. American Whitewater provided direct financial contributions to implement the project and volunteer resources through our local affiliate Washington Recreational River Runners. These volunteer resources included a professional contractor and construction services. Given the investments our organization made to improve this site, we do not believe it meets the standard of “substantial Federal investments” under 16 USC §6802(f)(4)(B). In addition, the site does not contain three of the standard amenities under 16 USC §6802(f)(4)(D) given that it lacks a permanent toilet facility, a permanent trash receptacle, and picnic tables. For those amenities that are available, service is generally minimal: parking is available but lightly developed, a kiosk is present but underutilized with no effective safety or interpretive information on the river, and security presence is limited. We do not support providing these amenities simply for the purpose of charging a fee at the site; the site as currently developed is effectively meeting current user needs. The vision for improving this site was not to develop a multi-purpose recreation site but to reduce conflicts with nearby private landowners and to address existing resource damage associated with a social trail that was not sustainable. We are concerned that charging a fee at this site will push users to other informal sites and exacerbate resource impacts and landowner conflicts we sought to address. This was a concern we raised at the time we proposed improvements and invested in this site.

Marblemount Boat Launch and Sauk Boat Launch

The Marblemount Boat Launch and Sauk Boat Launch are located within the Skagit Wild and Scenic River corridor. We request that you review these sites and provide justification that they meet the standard of “substantial federal investment” under 16 USC §6802(f)(4)(B). We do not have access to detailed records on the construction and development of these sites but understand that improvements have been made through mitigation dollars associated with the Skagit Hydroelectric Project. The Marblemount Boat Launch is within the hydroelectric project boundary and we are currently in active negotiations with Seattle City Light on a future project license that could include responsibilities for operations and maintenance of recreational facilities within the Wild and Scenic River corridor. In addition, these sites do not contain the standard amenities under 16 USC §6802(f)(4)(D), given the lack of a permanent toilet facility and a permanent trash receptacle; the Marblemount Boat Launch lacks a picnic table.

Conclusion

Thank you for the opportunity to provide comment on the Proposed Changes to Recreation Fees Identified by the Mt. Baker-Snoqualmie National Forest. While we are not opposed to fees for developed recreational facilities, the Federal Lands Recreation Enhancement Act was carefully worded to ensure that parking areas providing general access to public lands and waters were not included. We are familiar with all of the sites identified in the Public Notice and believe that the Cable Drop Boat Launch is unique given the substantial private investment for this site made by our organization and lack of standard amenities. It should more appropriately be recognized as a “general access” site under 16 USC §6802(d)(1)(B) for which user fees are prohibited, and not a developed recreation area as defined under 16 USC §6802(f)(4). The Marblemount Boat Launch and Sauk Boat Launch similarly lack standard amenities identified under 16 USC §6802(f)(4)(D) and should be reviewed as to whether they meet the standard of “substantial federal investment” under 16 USC §6802(f)(4)(B) given the investments of Seattle City Light.

Sincerely,

A handwritten signature in black ink, appearing to read 'Th O'Keefe', with a stylized flourish at the end.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director