

10 December 2003

Federal Highway Administration  
Attn: Matthew Joerin  
610 East Fifth Street  
Vancouver, WA 98661

RE: Middle Fork Snoqualmie Road (FR 29), EIS

Dear Mr. Joerin:

I'd like to thank you for hosting a productive and informative open house to provide us with information on the Middle Fork Snoqualmie Road improvement project. As a follow up to our discussions I would like to offer a few comments regarding the potential impacts of the project on recreational use of the river and opportunities to improve safety while enhancing visitor experiences that still preserve the aesthetic qualities of the river corridor.

American Whitewater is a national non-profit 501(c)3 river conservation and recreation organization founded in 1957. We have over 8,000 members and 160 affiliate clubs, representing approximately 180,000 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 Snoqualmie River watershed. A significant percentage of American Whitewater members reside in Western Washington—a short driving distance from this watershed for recreation.

The Middle Fork of the Snoqualmie River is a popular recreation resource less than one hour from downtown Seattle and accessible to a population of more than three million people. The Middle Fork and its tributaries include more than 40 miles of whitewater, serving a wide-range of skill levels. There are few places in the country where such a diversity of whitewater recreational opportunities exists so close to a major population center. Some of these runs challenge the world's top experts, others are suitable for a boater on their first river trip, and the section from Dorothy Lake Bridge to Tanner Road known as the "Middle-Middle" is one of the region's best known intermediate runs. It is one of the most popular rivers for the regional whitewater community but it also attracts visitors from across the country. There are two primary seasons for whitewater on the Middle Fork Snoqualmie. Depending on the section of interest and the skill level of the boater, people typically paddle the river between flows of 800 and 5000 cfs. Runs occur at higher and lower levels although less frequently. Ideal levels are in the range of 1200 to 3000 cfs. Once fall rains start in late October the river can come up at any time throughout the winter and early spring in response to rain events. Most use occurs on weekends, although ideal water levels attract boaters who can take off on a weekday. In the late spring, snowmelt begins and depending on the snowpack the river provides more dependable flows through the spring. In the months of April to June the river is particularly popular as an after work run due to its proximity to the Seattle area, the longer days, and the ease of hooking up with other boaters. It is not just the whitewater that attracts boaters, but the high quality of the scenery and the forested setting of this incredible resource which has been proposed for Wild and Scenic River status.

Today, the river has no formal public access sites, and only a few informal sites are available to river users on public lands. We are currently actively working with King County; the

City of North Bend; US Forest Service; National Park Service, Rivers, Trails, and Conservation Assistance Program; and the Washington State DNR to improve and designate access points along the river to protect riparian condition, provide safe access to the river, and enhance the quality of visitor experiences. There are a few specific sites that we are currently working on with our partner agencies that are particularly important to the regional whitewater boating community.

#### *Site 230-240, Island Drop*

This area in the vicinity of the now closed Mine Creek Campground on DNR property and is one of the most important areas along the river for whitewater recreation. This access site is perhaps the most popular on the river for boaters because it is a break point in the river where the character of the whitewater changes. Upstream of this point, rapids are less challenging and suitable for beginner-intermediates, and downstream of this point the more challenging rapids attract intermediate and advanced boaters. This is a particularly important site for the “after work crowd” on weekdays during the spring once daylight savings time sets in. It provides easy put-in access for a short run that is fun for a wide range of skill levels. Boaters park in the area between site 235 and site 240 in the area with the wide shoulder along the northern side of the road. Currently access is along a trail down a drainage ditch. We are currently working with WA DNR to develop a plan for this site that will include a better trail to the river and a management plan for this area as a day use site. When the river is at ideal flows, it’s common to have between 6 and 12 cars parked along the shoulder on the north side of the road. If there has been a particularly long break since the river has been running, one may see up to 20 cars parked here.

Looking upstream from site 230 one can see Island Drop rapid. Although historically paddlers put in above this rapid, with the closure of the Mine Creek Campground paddlers now typically put in below the rapid in the pool along the road near site 230 due to the fact that it is a shorter walk from the road. Once boaters launch in the pool below Island Drop rapid, they often hang out at a popular “playspot” located at the ledge that extends out from the southern bank of the river at site 230. This is a fun place to practice various tricks and surf your boat on a couple of nice waves while you wait for other boaters to begin a trip downstream. This is a very important feature on the river and protecting the integrity of the river bed at this location is extremely important to the whitewater community. In designing the road great care must be taken not to enter or alter the river channel at this location in any way.

#### *Site 325, Concrete Bridge*

This is a popular access site for whitewater boaters located on King County property. The site is used as a put-in for those desiring a longer run continuing past Island Drop and is particularly important to the rafting community. This site is also used by those who just want to make a short training run and take-out at Island Drop, and sometimes as a take-out for paddlers who begin their trip on the class II section upstream of the bridge.

We are currently working with King County Parks to improve this site which was altered by past road construction activities that eliminated convenient access. The site plan includes conversion of an old road bed approximately 60 yards downstream of the bridge to serve as a ~12’ wide trail for carry-in access. The site will be designed to accommodate rafts, canoes, and kayaks. There will be a load/unload zone with parking along the current wide shoulder. The project is currently scheduled for completion in March 2004. There is additional discussion of parking along the south side of the road in this area for river and hiking trail access, but there has been no formal planning.

*Site 480, Pratt River Access*

Historically, access at the Pratt River Bar was important to those who paddled the section known as the “Upper Middle” which starts at the Taylor River confluence. A short spur road left the Middle Fork Snoqualmie road and provided convenient access to the river. Flooding has severely damaged this spur road and the Forest Service ATM plan calls for formally decommissioning it and converting the road to a trail for river day use. Although the site is an excellent day-use area it no longer provides convenient river access for boaters due to the length of the carry in to the river. The preferred access point has since moved to a nearby site on DNR land just downstream of the Pratt River Confluence. This site is at a point where the river closely approaches the road at site 480. Access in the area of the Pratt River is important because the character of the river changes at the confluence with the Pratt River. A typical day trip beginning at the Taylor River ends at the Pratt River although some groups do continue downstream to the Concrete Bridge. Shoulder parking or a pull-out for up to six cars should be sufficient for this site.

*Overall Character of the Road*

While the character and high quality of the whitewater draws boaters from around the region along with visitors from across the country, one of the most important attributes of this river is the incredible scenic qualities of the river corridor. The river is an important escape from the urban environment of the greater Seattle area and as such remains a treasured resource for the citizens of the region. Specific recommendations for road design include the following: design speed of 35 mph, 11’ lanes with no shoulder except for pull-outs to provide recreational access, and minimum clear zone of 10’ or less to preserve the tree canopy. An additional challenge will be to address the issue of drag racing which has been a problem on straight paved sections of road in remote areas. In addition no bank armoring or walls should alter the river channel in any way at sites 230 or 290. In considering the overall design of the road, the Mountain Loop Highway along the upper reaches of the Sauk and South Fork Stilligumish River (FR 20) in the Darrington Ranger District and the Index-Galena Road along the North Fork Skykomish River (FR 63) in the Skykomish Ranger District might be considered as examples.

We thank you for the opportunity to provide input on this project. Please do not hesitate to contact American Whitewater or our local affiliate clubs if any additional clarification is required.

Sincerely,



cc:

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