



December 16, 2019

Submitted

Martie Schramm, District Ranger Snoqualmie Ranger District  
902 SE North Bend Way  
North Bend, WA 98045

Submitted Electronically <<https://cara.ecosystem-management.org/Public/CommentInput?Project=53997>>

RE: Middle Fork Snoqualmie and Pratt Rivers Comprehensive River Management Plan Scoping Comments

Dear District Ranger Schramm:

On behalf of The Mountaineers, we appreciate the opportunity to provide input in the development of a Comprehensive River Management Plan for the Middle Fork Snoqualmie and Pratt Rivers.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,800 skilled volunteers lead 3,200 outdoor education courses and activities annually for 15,500 members and guests. Our youth programs provide over 6,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

As a conservation-oriented recreation organization based in Western Washington, we have a deep interest in this landscape, even though our organization does not engage in whitewater recreation. We actively advocate for wild and scenic river designations as an integral part of Wilderness proposals, as rivers are the arteries of the landscapes where we recreate. As an outdoor recreation organization, we support planning efforts that ensure responsible recreational access on our public lands.

### **General Plan Comments**

We support the overall planning direction as proposed in the Middle Fork Snoqualmie and Pratt Wild and Scenic Rivers Comprehensive River Management Plan Scoping Packet. We believe that recreation is clearly Outstandingly Remarkable Values for this river. Given the

proximity to urban centers and value of this river corridor for day-use, we support the Proposed Management Action to close the river corridor below the Taylor River confluence to dispersed camping. We believe this closure could be extended a modest distance upstream. Regardless of the specific dividing line for the closure, areas upstream need to be modified to ensure we do not push the issues farther up the valley. Finally, if dispersed camping is to be eliminated, an action we support, then the campground needs to be made more accessible for the year-around camping opportunities that are currently available in the river corridor.

### **Detailed Plan Comments**

#### **At Page 3, Recreation Values**

We support our partners at American Whitewater in suggesting that descriptive language that provides some context for why the whitewater opportunities are exceptional should be included. The stunning mountain views and exceptional scenery are unique to a river that is so close to an urban center and readily accessible.

#### **At Page 9-10, Wild and Scenic River Boundaries**

We support the proposed approach to boundaries including the entirety of the headwaters. As an organization that works extensively with Wilderness designations, we support the concept of making the river and wilderness boundary coincident to assure seamless management across the landscape. We agree with including the 1.25 miles of the Taylor River given that the recreational opportunities along this lower segment of the Taylor River are integral to the visitor experience.

#### **At Page 11, Table 3**

We strongly support the Proposed Management Actions to close dispersed camping within ¼ mile of the road and implement river access improvements at Bridgeview. The Potential Management Actions include restoration of large woody debris. While we are not opposed to such projects, we suspect the most cost effective way to restore wood to the system will be a continued focus on riparian forest protection. Much of the Wild and Scenic river reach is a transport reach. Habitat restoration projects will likely be more effective and provide greater ecological benefit if implement farther downstream in the alluvial reaches of the river.

#### **At Page 13, Visitor Capacity**

We appreciate the distinction that visitor capacity is not the same as use limits. Too often these concepts are confused. Like other recreational uses on this landscape, available parking areas are likely to be a primary driver of capacity for those who wish to experience the river for day use. Alternatives including a shuttle service should be considered as future management options. At Page 14, Visitor Use Analysis Areas The appropriate distinct areas of analysis have been defined. We agree with how these are defined. With the closure of camping in Section #3, and the recent road paving project, we expect that there may be additional dispersed camping pressure in Scenic Section #2. This should be closely monitored to ensure that dispersed camping does not expand to unsustainable levels. User-created campsites should be monitored and standards established. If dispersed camping activity exceeds standards, extending the closure should be considered. The number of vehicles parked both in designated parking areas and outside those areas should also be monitored.

#### **Appendix A, Maps**

The Proposed Dispersed Camping closure includes a portion of Section 22. We believe it should include all of Section 22. This entire area is extensively used for day use and is in close proximity to the campground. We also believe that if dispersed camping is closed, a viable alternative needs to be provided. Due to its low elevation, the Middle Fork Snoqualmie is an excellent destination for camping in late winter or early spring. We have experienced weekends in April and even March when dispersed campsites in the valley are occupied but the campground gate is closed. The campground should be opened throughout the year even if minimal service is provided.

### **Conclusion**

We appreciate the opportunity to provide scoping comments on the Middle Fork Snoqualmie and Pratt Wild and Scenic Rivers Comprehensive River Management Plan. We support the planning direction and details that have been provided to date. The Mountaineers looks forward to supporting this effort, especially via our partners at American Whitewater. We look forward to a management plan that meets community needs and protects the resource.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katherine Hollis".

Katherine Hollis,  
Conservation and Advocacy Director