



A ranger shows pictures of birds to visiting children during an early morning bird walk near the North Cascades Visitor Center.

WELCOME

You are now in the Public Involvement Chapter. Here are the topics you can read about:

Public Scoping

Public Review of the Draft Alternatives

Skagit Wild and Scenic River Eligibility and Suitability Studies Public Process

Agency Consultation and Coordination

List of Draft GMP/EIS Recipients

Public Review of the Draft GMP/EIS

Substantive Comments and Responses on the Draft General Management Plan and Environmental Impact Statement

Comment Letters

CHAPTER 7: PUBLIC INVOLVEMENT

Public involvement and consultation efforts were ongoing throughout the process of preparing this draft GMP/EIS. Public involvement methods included Federal Register notices, news releases, public meetings and workshops, invited presentations at partner and special interest group meetings, newsletter mailings, and website posting. This chapter provides information about each public involvement period and summarizes public comments received by the NPS during each phase.

PUBLIC SCOPING

The Ross Lake National Recreation Area general management planning team launched the planning process in late September 2006. The official public scoping period was initiated on September 29, 2006 and closed on December 30, 2006. A comprehensive scoping outreach effort was planned to elicit early public comment regarding issues and concerns, the nature and extent of potential environmental impacts, and possible alternatives that should be addressed in the preparation of the GMP. Through various scoping outreach activities, the NPS welcomed information and suggestions from the public regarding resource protection, visitor use, and land management.

The NPS formally announced the public scoping period and invited public comment through newsletters, correspondence, press releases, public workshops, informal meetings, the NPS Planning, Environment, and Public Comment (PEPC) website, and a *Federal Register* notice. NPS staff produced and mailed Newsletter Number 1 to approximately 350 individuals and entities on the mailing list. Agencies, organizations, governmental representatives, and tribal governments were sent letters of invitation to attend the public workshops or individual meetings. Press releases were distributed to local and regional news media. The project was launched on the NPS Planning, Environment, and Public Comment (PEPC) website: <http://parkplanning.nps.gov/rola>, providing access to information about the Ross Lake NRA GMP and a method for taking public comments. A notice of intent to prepare a general management plan and environmental impact statement for Ross Lake National Recreation Area was published in the *Federal Register* on October 30, 2006 (Vol. 71, No. 209, pp. 63351-63352). The public was invited to submit comments by regular mail, e-mail, fax, online, and at public workshops and individual meetings.

News articles featuring the public workshops were written in the local Courier Times and East Skagit Community News and announced on private and public radio stations.

Public Workshops and Written Comments

The NPS held seven public workshops in western Washington and British Columbia in October 2006 to provide the public with an opportunity to learn about the general management planning project and to offer comments. The meetings began with a presentation of Ross Lake National Recreation Area and the GMP planning process. The meeting then transitioned into a facilitated group discussion format. Meetings were held in Washington State in Concrete, Marblemount, Sedro-Woolley, Seattle and Bellingham; and in Surrey and Chilliwack, British Columbia. 63 people attended the meetings overall. The following table lists the locations, dates, and number of people who attended each meeting:

Table 7.1 Public Scoping Workshops, 2006

Location	Date	Attendance
Concrete, WA	October 17, 2006	8
Marblemount, WA	October 18, 2006	4
Sedro-Woolley, WA	October 19, 2006	14
Bellingham, WA	October 23, 2006	12
Surrey, BC	October 24, 2006	0
Chilliwack, BC	October 25, 2006	9
Seattle, WA	October 26, 2006	16
TOTAL		63

During the public comment period, the NPS received a total of 19 written responses in the form of letters, e-mails, newsletter response forms, and web comments.

Comments, either through public meetings or written correspondence, were received from the following representatives:

- The Access Fund
- Backcountry Horsemen of Washington
- Buffalo Run Inn

- Canadian Ministry of the Environment
- Conservation Northwest
- Environmental Protection Agency
- Miller Construction
- National Parks Conservation Association
- North Cascades Conservation Council
- North Cascades Institute
- Ross Lake Resort
- Seattle City Light
- Skagit County
- Skagit Environmental Endowment Commission
- Student Conservation Corps
- Washington Climbers Association
- Washington Native Plant Society
- Wilderness Conservation Corps
- The Wilderness Society

Summary of Public Scoping Comments

The following summary incorporates both the public workshop comments and the written comments received by the NPS through the close of the public comment period. The NPS received correspondence from over 80 individuals and organizations during the public comment period that provided a total of over 750 specific comments. All comments received were reviewed and considered by the NPS staff for the preparation of this GMP.

The comments received covered a broad range of topics, ideas, and preferences. Many statements or ideas were expressed by several individuals. Comments were grouped into 25 topics, and the number in brackets indicates the number of comments that were received concerning the stated topic. The topics that received the most comments were Recreation (269), Natural Resources (150), Visitor Experience/Use (106), Education and Interpretation (87), Access and Transportation (75), and Visitor Facilities (60). Other topics receiving comments are described below.

Recreation

Most of the comments on recreation stated that Ross Lake NRA should provide a diversity of dispersed recreational activities with an emphasis on non-motorized activities. Many commenters stated that recreational activities should not impact the North Cascades natural ecosystem resources and conditions.

Several commenters wanted more dayhiking opportunities, climbing opportunities, and a variety of camping or overnight experiences. Many people said they would be willing to pay fees for service and use of Ross Lake NRA facilities. Comments related to the installation of an advanced reservation system were mixed. Some comments stated that group size limits should be better enforced to ensure that large groups do not overrun Ross Lake NRA.

Lake recreation was a popular topic, and the public provided dozens of comments on boating within Ross Lake NRA. The overwhelming majority of comments on boating and lake recreation stated that self-propelled boating should be emphasized and there could be limits on motorized use that could benefit natural conditions, soundscapes, and visitor experiences on the lakes. Limits that were suggested included limiting boat engine size and horsepower, phasing out the use of 2 cycle engines in favor of 4 cycle engines, and limiting jetskis and float planes.

Natural Resources

The overwhelming majority of comments on natural resources maintained that ecological integrity of resources and processes in Ross Lake NRA should be preserved. These resources include the diversity of wildlife, vegetation, aquatic, air and water resources. Many people were concerned about recreational pressures and hydro-electric demands that could create impacts to natural resources, wilderness values, and the primitive character of Ross Lake NRA.

Commenters wanted to ensure the protection of migration corridors for wildlife. Several people expressed support for the reintroduction of grizzly bears and other native wildlife populations. Comments also expressed concern about the introduction of invasive, non-native species and support for the NPS to remove and prevent invasive species. Some people mentioned concern about climate change and the impacts from global warming on natural resources within Ross Lake NRA.

Visitor Experience/Use

When asked what kind of visitor experience they would like to have at Ross Lake NRA in 20 years, the vast majority of commenters stated that its existing character should be preserved. Comments described the existing character as a place of beauty, spaciousness, and isolation. Commenters wanted the wilderness character to be preserved as well, where

visitors can experience solitude, peace, and quiet in a natural setting.

Several people said that the NPS should allow for a natural increase in visitation and encourage learning about Ross Lake NRA. Several people also recommended that the NPS should seek to diversify its visitor base through new programs and facilities.

Education and Interpretation

Most comments on education and interpretation suggested that the NPS should diversify and increase educational and interpretative programs. The NPS could explore additional ways to connect with the interested public and park visitors, such as internet-based educational programs. Partnerships for education and interpretation should be expanded, and the partnership with North Cascades Institute could serve as a model. The NPS should consider ways to interact with and engage visitors who are driving through Ross Lake NRA on Highway 20.

Access and Transportation

Comments included concerns about new and upgraded roads to and within Ross Lake NRA, the soundscape along the North Cascades Highway corridor, and expanded opportunities for non-vehicular access to Ross Lake NRA's scenic and hiking areas. Several people said their greatest concern is the possibility of paving the road from Hope, British Columbia to Hozomeen; they feared that paving the road will allow larger boats and more visitors which would detract from the visitor experience in the Hozomeen area. Opening up the North Cascades Highway to year-round traffic was a significant concern, and most commenters said that year-round traffic would prevent visitors from wintertime recreational activities along the North Cascades Highway to the east of the Ross Dam Trailhead parking lot. Several comments stated that noise intrusions along the North Cascades Highway affect park users, and the NPS should work with the WSDOT to enforce maximum permissible noise levels. Several comments focused on public transportation to trailheads and scenic areas throughout the park, which could broaden visitor use while reducing vehicular traffic along the North Cascades Highway. Some people thought the parking lot at Ross Dam trailhead should be expanded, as there is not enough parking during the peak season.

Visitor Facilities

Comments on visitor facilities focused on the preventing overdevelopment, locating new facilities within the North Cascades Highway corridor, and creating a distinct park entrance that is consistent with the natural setting. Most comments stated that Ross Lake NRA should maintain existing facilities, and growth, if at all, should be modest and located in existing developed areas of Ross Lake NRA. Several people stated the need for a more formalized entrance, which would provide a distinct sense of arrival to Ross Lake NRA and park complex as well as visitor information. A few people would like to see improved visitor facilities at campgrounds.

User Capacity

Many commenters expressed concern over the region's increase in population, subsequent increase in visitation and the impacts this additional visitation could have on resources and existing visitor experiences. People wanted to ensure that resources will not be degraded by increased visitor use. Some commenters thought the NPS could consider a permitting or reservation system that could regulate the number of visitors to Ross Lake NRA.

Interagency Management

Most comments on interagency management stated that the NPS will benefit from working with related agencies and partners. These entities include Seattle City Light, the Washington Department of Transportation, U.S. Forest Service, Washington Department of Fish and Wildlife, British Columbia Parks, Skagit Environmental Endowment Commission, and the North Cascades Institute. Issues that could



NPS staff collected public comments from community members at 7 public scoping meetings in October 2006.

be mutually addressed through cooperation could be visitor use and facilities management in the Newhalem area, soundscapes along the North Cascades Highway, resource protection strategies and visitor services with neighboring land management agencies, and joint educational programs with Seattle City Light and the North Cascades Institute.

Wilderness

The majority of comments on wilderness pertained to preserving wilderness character, values, and experience. These commenters thought the NPS should provide recreational opportunities that are compatible with wilderness and protect wilderness from impacts. Comments suggested that wilderness educational and interpretive opportunities should be expanded.

Other Comments

The public commented on several other areas of park management and operations. These general comments are listed below.

Comments on staffing recommended increasing staffing, particularly rangers in the field for interpretation, resource protection, and visitor safety.

When zoning the park, visitor facilities and services should be concentrated in already impacted areas along Highway 20.

Comments on concessions focused on the Ross Lake Resort. They stated that some expansion could be manageable; however no new concessions should be added to the lake.

Seattle City Light operations could be coordinated with the NPS, including the ferry schedule, lake levels, and removal of woody debris.

Safety and security were concerns, particularly along Highway 20 and at the international border with Canada.

Partnerships were strongly encouraged to enhance resource protection, visitor recreation, and education and interpretation.

Cultural resources, particularly archeological resources, were highlighted by a few individuals encouraging the NPS to preserve and conduct

additional research in cooperation with tribal governments.

Some commenters were concerned about funding for Ross Lake NRA and want to ensure that appropriate funding levels match Ross Lake NRA's needs.

PUBLIC REVIEW OF THE DRAFT ALTERNATIVES

The Draft Alternatives public process was an additional planning step to ensure that the public fully comprehended the range of draft alternatives and was able to comment effectively on these draft alternatives. The primary purpose of this planning step was to understand the public's concerns and preferences with regard to the range of draft alternatives and to assist the planning team in refining the draft alternatives and selecting a preferred alternative.

The official draft alternatives public process began in February 2008 when the NPS produced and mailed the Draft Alternatives Newsletter to approximately 450 contacts on the mailing list and announced this planning step on the NPS website (www.nps.gov/rola and <http://parkplanning.nps.gov/rola>). The newsletter fully outlined the concepts and actions in the draft alternatives and proposed management zones. A planning schedule including dates, times, and locations for the public workshops invited public participation and comments on the range of draft alternatives. The newsletter also contained a business reply questionnaire that asked the public to comment on the four draft alternatives. Press releases were prepared and mailed to local media in advance of the public meetings by the North Cascades NPS Complex staff.

Public Workshops and Written Comments

The NPS held four public workshops in Concrete, Sedro-Woolley, Bellingham, and Seattle in February and March 2008. Seventy people participated in the public workshops and provided oral comments.

The workshops began with a presentation of the draft alternatives and then transitioned into facilitated group discussions. In the cases of meetings with large attendance, separate stations were set up for the

topics of Recreation/Visitor Experience, Natural and Cultural Resources, and Facilities. Members of the public could visit any or all of the stations to provide comments and join discussions on those topics. Each station was attended by NPS staff with expertise on the relevant issues. Staff took detailed notes on all comments received in their groups. The following table lists the locations, dates, and number of people who attended each meeting:

Location	Date	Attendance
Concrete, WA	February 25, 2008	12
Sedro-Woolley, WA	February 26, 2008	26
Bellingham, WA	March 4, 2008	16
Seattle, WA	March 5, 2008	16
TOTAL		70

During the public comment period, the NPS received a total of 32 written responses in the form of letters, e-mails, newsletter questionnaires, and comments submitted on the NPS Planning, Environment, and Public Comment (PEPC) website. The vast majority of written comments were received from Washington State.

Comments, either through public meetings or written correspondence, were received from the following representatives of entities including:

- The Access Fund
- American Whitewater
- British Columbia Ministry of the Environment
- The Mountaineers
- National Parks Conservation Association
- North Cascades Conservation Council
- North Cascades Institute
- Pacific Northwest Trail Association
- Ross Lake Resort
- Seattle City Light
- Skagit Alpine Club
- Skagit Citizens Alliance for Rural Preservation
- Skagit Commercial Use Authorized Users
- Skagit Environmental Endowment Commission
- Washington Seaplane Pilots Association
- Whatcom County Backcountry Horsemen
- The Wilderness Society

Summary of Draft Alternatives Public Comments

The comments on the draft alternatives covered a broad range of topics, issues, and recommendations for Ross Lake NRA. When compiled, 150 different comments or ideas were represented, with a total of 539 individual comments provided overall. Because various statements or ideas were mentioned repeatedly, similar comments are stated once, but the number of times a particular point was made has been tabulated.

The following summary is organized by topics that are addressed for each alternative in the Draft GMP/EIS. The topics are: Recreation and Visitor Experience, Natural Resources, Access and Transportation, Facilities, Interpretation and Education, Cultural Resources, and Operations. The majority of comments received were related to recreation and visitor experience. Natural resources, access and transportation issues, and facilities each accounted for approximately ten percent of comments. Smaller percentages were split between the additional issue areas discussed below.

Recreation and Visitor Experience

Recreation and visitor experience was the most common area of comment overall, with nearly half of all comments submitted.

Lake Recreation

Lake recreation was an area of strong interest to the public, and the majority of recreation comments overall were related to the use of motorboats within Ross Lake NRA. Although a few commenters supported continuing current motorboat policies and practices, the public expressed a high level of support for setting limits on motorboats in order to protect resources and maintain a high quality visitor experience. There was also strong support for implementing a deadline for engine restrictions before the proposed date of 2020. Suggestions for how to limit motorboats included speed limits, restricting motorboat activities to certain geographic areas, restrictions on amphibious craft, and creating a motorboat “season.” There was a moderate amount of support for phasing out gas-powered boats in favor of different engine types. Some opposition to towing of people was also expressed. The public comments also

reflected support for non-motorized boating within Ross Lake NRA.

Camping

Public comments on camping stated support for maintaining camping opportunities as well as support for limited improvements and enhancements. In the face of severe or catastrophic weather events, the public was in favor of a “no net loss” approach to rebuilding campgrounds. Several commenters wanted the NPS to retain existing popular campground sites such as Colonial Creek and Goodell, or provide comparable experiences.

Several comments related to the Hozomeen campground area, in support of improved facilities and programs, including the new ranger station/visitor center, and additional interpretive opportunities. A number of comments also encouraged development of large group areas within Ross Lake NRA, including campsites and picnic areas. These facilities could be geared toward families, educational groups, or other visitor groups.

Some support was expressed for maintenance and improvement of backcountry campsites, as well as for additional frontcountry camping opportunities, including walk-in sites. A few comments stressed maintaining current sites as they are, and were opposed to expansion. Some comments opposed expanded campsite infrastructure such as electricity and RV hookups. The boat-in campsites were of interest to the public, with equal numbers supporting maintenance of the existing boat-in sites and providing new or enhanced boat-in sites. There was also minimal support for year-round camping and recreational access.

Trails, Hiking, and Climbing

The majority of comments on trails and hiking stated support for increased or improved trails within Ross Lake NRA, including day-hiking trails along the North Cascades Highway corridor. The public comments also included several specific ideas for new trails. A few comments suggested limiting the amount of new trails, either by location, length, or number. Additionally, a few commenters preferred to focus on maintaining existing trails.

Most comments related to sport climbing expressed support for enhanced climbing management, including such possibilities as establishing a climbing

permit system and developing Climbing Management Areas. A few comments supported continuing the climbing opportunities as they currently exist.

Motorized Recreation

The most comments on motorized recreation were related to seaplanes. Several commenters wanted to maintain current seaplane access to Ross Lake NRA, and expressed concern about possible future limitations on seaplane use. Several comments also suggested restricted seaplane use within Ross Lake NRA, including specific ideas such as designating use areas and restricting times of operation. There was also some general concern about aircraft and interest in limiting overflights. Additionally, some support was provided for limiting snowmobile use.

Non-motorized Recreation

The most prevalent theme among comments on non-motorized recreation was support for enhancements of stock staging area opportunities and improved horse trails and facilities. There was concern with security and vandalism in current parking areas, as well as potential conflict with non-stock users. Some commenters also wanted improvements to bicycle access and facilities, as well as for restrictions on hunting. A few comments were supportive of promoting non-motorized winter recreation.

Fees and Reservations

The public expressed strong support for an expanded reservation system. Ideas included providing additional online information and reservation features, as well as allowing some permits and camping reservations to be arranged online or remotely. A few comments supported implementing limited user fees, which could be restricted to certain geographic areas or activities. Some commenters also stated a concern about obtaining backcountry reservations when entering Ross Lake NRA from the east.

Wilderness

Several comments expressed general support for wilderness preservation within Ross Lake NRA. In addition, the idea of preserving the “wilderness character” of Ross Lake NRA was also stated several times.

Natural Resources

The most common comments on natural resources discussed the need for ecosystem preservation and for native species restoration and stewardship. Noise and light pollution were of concern to the public, and comments expressed strong support for preserving natural soundscapes and dark night sky. There were also several comments in support of continued fire management practices, including cooperative fire management and allowing natural fires to burn. A few comments provided support for a wild and scenic river study of the Skagit River. Strong support was also provided for low-impact research activities within Ross Lake NRA.

Access and Transportation

Access and transportation comments focused on roads, parking, universal access, and alternative transportation.

Comments related to the North Cascades Highway were raised about increased traffic along the highway corridor and its potential impacts on safety, visitor experience, and the rural character of communities outside Ross Lake NRA. The public was also concerned about noise levels along the North Cascades Highway and the need for noise reduction. A few comments expressed support for additional pullouts and overlooks and universal access to resources within Ross Lake NRA. There was also a moderate level of support for expanding the Ross Dam Trailhead parking lot.

There was also strong support for developing alternative transportation options within Ross Lake NRA. A few commenters supported the undertaking of a transportation study to analyze transportation issues. Additionally, a few commenters expressed opposition to the idea of paving the road from Hope to Hozomeen.

Facilities

Public comments on the draft alternatives included many new ideas for placement or development of facilities within Ross Lake NRA. Several public comments were received specific to the Wilderness Information Center and its potential future location. Several commenters supported moving the facility to the North Cascades Highway. Some commenters suggested maintaining the Wilderness Information Center in its current location.

Some commenters expressed support for improved park entrances and improved signage for trails, facilities, and permitting stations. Some people wanted a modest expansion of the North Cascades Environmental Learning Center. A few commenters provided support for employee housing.

Other comments on facilities supported a new ranger station/visitor center at Hozomeen.

Interpretation and Education

Comments on interpretation and education focused on continuation and enhancement of park-based programs. There was also strong support for an increase in interpretation of cultural resources within Ross Lake NRA, including the history of the hydroelectric projects and Native American history and use. Comments supported a continued relationship with the North Cascades Institute and Environmental Learning Center and other education partnerships. Additional comments expressed support for increasing interpretive staff presence within Ross Lake NRA.

Climate Change

Several commenters supported taking actions to reduce Ross Lake NRA's carbon footprint and reduce potential contributions to climate change. A moderate level of public support was expressed for applying sustainable or "green" building design to new facilities.

Cultural Resources

Some support was expressed for researching, documenting, and interpreting cultural resources as well as providing access to cultural resources.

Concessions

Several commenters wanted an expanded water taxi service on Ross Lake. Several commenters were concerned with potential impacts of expanding the Ross Lake Resort. Issues of concern included user capacity, design issues, access, and potential impacts to visitor experience and neighboring campsites. Comments were also received in support of additional overnight lodging opportunities both within and outside Ross Lake NRA.

Partnerships

The public comments showed strong support for domestic interagency partnerships, primarily with the U.S. Forest Service and continued cross-border cooperation and partnership with Canada.

Seattle City Light

Several comments relating to Seattle City Light facilities were received. These were predominately in support of adaptive reuse options in Diablo and Newhalem Townsites. In addition, there were several comments in support of additional Seattle City Light-provided public amenities, such as landscaping and wayside exhibits. The public also expressed interest in increased interpretation of Seattle City Light activities such as facility tours, and interpretation of hydroelectric history.

Staffing

A few public comments expressed support for increased staff presence within Ross Lake NRA, including rangers, interpreters, and seasonal staff.

User Capacity

Some public comments were received concerning user capacity issues. Concern was expressed with how increased visitation will be handled in the future and resulting impacts on visitor experience.

Lands

A few comments suggested expanding the Ross Lake NRA boundary.

SKAGIT WILD AND SCENIC RIVER ELIGIBILITY AND SUITABILITY STUDIES PUBLIC PROCESS

The NPS invited public comments on the Skagit Wild and Scenic River Eligibility and Suitability Studies in fall 2008. The primary purpose of this public comment period was to understand the public's concerns about the preliminary eligibility findings and potentially designating the river segments as wild and scenic rivers. This was an extra planning step designed to provide the public with opportunities to focus on

the Skagit wild and scenic studies. The information gathered was used in formulating and refining the Skagit Wild and Scenic River Eligibility and Suitability Studies.

A newsletter was sent to approximately 450 contacts and thirty people attended the two public meetings held on October 14, 2008 in Seattle, WA and October 15, 2008 in Sedro-Woolley, WA. Press releases were sent to regional media announcing the public meetings and public comments were taken through October 31, 2008. Written comments were received from 52 organizations and individuals.

The three ideas that received the most public comments were support for designation and preliminary study findings, support for adding recreation and scenery as outstandingly remarkable values; and support for conducting additional wild and scenic river eligibility and suitability studies for other river segments within the North Cascades NPS Complex.

More information about the Skagit Wild and Scenic River Eligibility and Suitability Studies and public involvement can be found in Appendix D.

AGENCY CONSULTATION AND COORDINATION

The following sections document the consultation and coordination efforts undertaken by the NPS during the preparation of this Draft GMP/EIS. Consultation is an ongoing effort throughout the entire process of developing the Final GMP/EIS. Copies of letters exchanged with partners and agencies are in the administrative file.

Consultation with Native American Tribes

In keeping with the provisions of the National Historic Preservation Act- Section 106 process, the North Cascades NPS Complex staff established opportunities for interaction with tribal officials. Swinomish, Sauk-Suiattle, and the Upper Skagit Tribes were consulted for this project.

Consultation with the Washington State Historic Preservation Officer and the Advisory Council on Historic Preservation

The Washington State Historic Preservation Officer must be consulted concerning any resource management proposals that might affect a cultural property listed on or eligible for the National Register of Historic Places; several listed properties exist within Ross Lake NRA. The NPS initiated consultation with the Washington State Historic Preservation Officer and the Advisory Council for Section 106 of the National Historic Preservation Act, as amended, in date during the public scoping period.

Consultation with the U.S. Fish and Wildlife Service

The Endangered Species Act of 1973 (ESA), as amended, directs every federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the existence of any listed species or destroy or adversely modify critical habitat (50 CFR 400). The ESA authorizes federal agencies to enter into early consultation with the USFWS to make those determinations. Formal consultation with the USFWS under Section 7b of the ESA was conducted in date. (See Special Status Species in the Affected Environment.)

Coordination with other Agencies, Organizations, and Groups

The Federal Land Policy Management Act, Title II, Section 202, provides guidance for coordinating planning efforts with American Indian tribes, other federal departments, and agencies of the state and local governments. All local governments, tribal governments, and federal and state agencies with resource management responsibilities or interest in the planning area were informed of the planning effort and encouraged to participate.

LIST OF DRAFT GMP/EIS RECIPIENTS

Paper copies or executive summaries of the draft GMP/EIS were sent to the following recipients. Additionally, executive summaries were sent to the mailing list of approximately 400 individuals and

organizations. The draft GMP/EIS is available on the internet at www.nps.gov/noca/parkmgmt/rlna-gmp.htm and upon request.

Federal Agencies and Officials

- Advisory Council on Historic Preservation, Lakewood, CO
- Army Corps of Engineers, Chelan, WA
- Bureau of Indian Affairs, Portland, OR
- Ebey's Landing National Reserve, Coupeville, WA
- Environmental Protection Agency, Seattle, WA
- Federal Energy Regulatory Commission, Portland, OR and Washington, DC
- Honorable Cathy McMorris Rodgers, U.S. House of Representatives, Washington, DC
- Honorable Dock Hastings, U.S. House of Representatives, Washington, DC
- Honorable Maria Cantwell, U.S. Senate, Washington, DC
- Honorable Patty Murray, U.S. Senate, Washington, DC
- Honorable Rick Larsen, U.S. House of Representatives, Washington, DC
- Mount Rainier National Park, Ashford, WA
- National Oceanic and Atmospheric Administration, Seattle, WA
- Office of Federal Programs, Washington, DC
- Olympic National Park, Port Angeles, WA
- San Juan Island National Historical Park, Friday Harbor, WA
- U.S. Department of Transportation, Federal Highway Administration, Vancouver, WA
- U.S. Fish and Wildlife Service, Lacey, WA
- U.S. Forest Service, Mount Baker-Snoqualmie, Okanogan-Wenatchee National Forests
- U.S. Geological Survey, Seattle, WA

State and Local Agencies and Officials

- Chelan County Courthouse, Wenatchee, WA
- City of Burlington, Burlington, WA
- City of Mt. Vernon, Mt. Vernon, WA
- City of Seattle, Seattle, WA
- Concrete Public Library, Concrete, WA
- Economic Development Association, Mt. Vernon, WA
- Governor Christine Gregoire, Olympia, WA
- Honorable Cary Condotta, 12th Legislative District Representative, Olympia, WA
- Honorable Dale Brandland, 42th Legislative District Senator, Olympia, WA

- Honorable Dan Kristiansen, 39th Legislative District Representative, Olympia, WA
- Honorable Doug Ericksen, 42th Legislative District Representative, Olympia, WA
- Honorable Kelli Linville, 42th Legislative District Representative, Olympia, WA
- Honorable Kirk Pearson, 39th Legislative District Representative, Olympia, WA
- Honorable Linda Evans Parlette, 12th Legislative District Senator, Olympia, WA
- Honorable Mike Armstrong, 12th Legislative District Representative, Olympia, WA
- Honorable Val Stevens, 39th Legislative District Senator, Olympia, WA
- Seattle City Light, Newhalem, Rockport, and Seattle, WA
- Sedro-Woolley City Council, Sedro-Woolley, WA
- Skagit County Commissioners Office, Mt. Vernon, WA
- Skagit Environmental Endowment Commission, Seattle, WA
- Town of Concrete, Concrete, WA
- Washington Department of Archaeology & Historic Preservation, Olympia, WA
- Washington Department of Ecology, Olympia, WA
- Washington Department of Fish & Wildlife, Wenatchee, WA
- Washington Department of Natural Resources, Olympia, WA
- Washington Department of Parks and Recreation
- Washington Department of Tourism, Olympia, WA
- Washington Department of Transportation
- Washington Department of Transportation, Olympia, WA
- Washington Department of Water Resources
- Washington State Historic Preservation Officer, Olympia, WA
- Whatcom County Office, Bellingham, WA
- Whatcom County Parks, Bellingham, WA
- Whatcom County Planning & Development Services, Bellingham, WA
- Winthrop Town Council, Winthrop, WA

Tribes

- Sauk-Suiattle Tribe, Darrington, WA
- Swinomish Tribe, La Conner, WA
- Upper Skagit Tribe, Sedro-Woolley, WA

Businesses, Institutions, and Organizations

- Adventures Cross Country, Mill Valley, CA
- Alpine Ascents International, Seattle, WA
- American Alpine Institute, Bellingham, WA
- American Mt. Guides Association, Boulder, CO
- American Rivers, Seattle, WA
- American Whitewater, Seattle, WA
- Ascent Institute (Teams & Leaders), Seattle, WA
- Backcountry Horseman of WA, Lake Stevens, WA
- Base Camp, Inc., Seattle, WA
- Bellingham Bicycle Club, Bellingham, WA
- Blue Water Network, San Francisco, CA
- Boy Scouts of America, Seattle, WA
- Camp Nor'wester, Lopez Island, WA
- Camp Thunderbird, St. Louis, MO
- Cascade Bicycle Club, Seattle, WA
- Cascade Corrals Cragg, Stehekin, WA
- Cascade Loop Association, Wenatchee, WA
- Concrete Chamber of Commerce, Concrete, WA
- Conservation Northwest, Bellingham, WA
- Dali Llama Wilderness Adventures, Bow, WA
- Defenders of Wildlife, Washington, DC
- Discover Your Northwest, Seattle, WA
- Earth Justice Legal Defense Fund, Oakland, CA
- FOCUS, Rockport, WA
- Go-Trek and Expeditions, Bellevue, WA
- Hi Lakers, Mercer Island, WA
- International Mountain Guides, Inc., Ashford, WA
- Izaak Walton League, Bellevue, WA
- King County Outdoor Sports Council, Seattle, WA
- Longacre Expeditions, Newport, PA
- McGraw YMCA, Camp Echo, Evanston, IL
- Methow Biodiversity Project, Twisp, WA
- Methow Conservancy, Winthrop, WA
- Moondance Adventures, Asheville, NC
- Mount Baker Council of the Boy Scouts of America, Everett, WA
- Mountain Madness, Seattle, WA
- National Outdoor Leadership School, Conway, WA
- National Parks Conservation Association, Seattle, WA
- North Cascades Chamber of Commerce, Marblemount, WA
- North Cascades Conservation Council, Seattle, WA

- North Cascades Institute, Sedro-Woolley, WA
- North Cascades Mt. Guides, Mazama, WA
- Northwest Mt. School, Leavenworth, WA
- Outdoor Recreation Information Center, Seattle, WA
- Outward Bound West, Mazama, WA
- Pacific Northwest Trail Association, Sedro-Woolley, WA
- Paddle Trails Canoe Club, Seattle, WA
- Pro Guiding Service, North Bend, WA
- REI, Seattle, WA
- Ross Lake Resort, Rockport, WA
- Sedro-Woolley Chamber of Commerce, Sedro-Woolley, WA
- Sierra Club Cascades Chapter, Seattle, WA
- Sierra Club Cascades Chapter, Tacoma, WA
- Sierra Club Outing Committee, Corvallis, OR
- Skagit Alpine Club, Mt. Vernon, WA
- Skagit Audubon Society, Mt. Vernon, WA
- Skagit Community Action, Mt. Vernon, WA
- Skagit County Historical Society, Larcener, WA
- Skagit County Parks Foundation, Mt. Vernon, WA
- Skagit County Upriver Services, Concrete, WA
- Skagit Fisheries Enhancement Group, Mt. Vernon, WA
- Skagit Land Trust, Mt. Vernon, WA
- Skagit River Bald Eagle Awareness Team, Concrete, WA
- Skagit Watershed Council, Mt. Vernon, WA
- Student Conservation Association, Seattle, WA
- Summit Expeditions International, Colorado Springs, CO
- The Access Fund, Moab, UT
- The Evergreen State College, Olympia, WA
- The Mountaineers, Bellingham, WA
- The Mountaineers, Seattle, WA
- The Nature Conservancy, Mt. Vernon, WA
- The Nature Conservancy, Seattle, WA
- The Road Less Traveled, Chicago, IL
- The Wilderness Society, Seattle, WA
- Trout Unlimited, Arlington, VA
- University Kayak Club, University of Washington, Seattle, WA
- Washington Kayak Club, Seattle, WA
- Washington Native Plant Society, Seattle, WA
- Washington Outfitters & Guide Association, Snohomish, WA
- Washington Recreational River Runners, Renton, WA
- Washington Trails Association, Seattle, WA
- Washington Water Trails Association, Seattle, WA
- Washington Wilderness Coalition, Seattle, WA
- Washington's National Park Fund, Seattle, WA
- Western Land Exchange Project, Seattle, WA
- Western Washington University Outdoor Center, Bellingham, WA
- Wild Fish Conservancy, Duvall, WA
- Wildcat Steelhead Club, Sedro-Woolley, WA
- Wilderness Inquiry, Minneapolis, MN
- Wilderness Ventures, Jackson Hole, WY
- Wilderness Watch, Missoula, MT
- Winthrop Chamber of Commerce, Winthrop, WA
- Youth Dynamics Adventures, Leavenworth, WA
- YMCA of Greater Seattle, Seattle, WA

Canadian Entities

- British Columbia Ministry of Environment, Vancouver, BC
- British Columbia Parks, Vancouver, BC
- Tourism British Columbia, Vancouver, BC

PUBLIC REVIEW OF THE DRAFT GMP/EIS

For the remainder of this chapter, all information is new for the final GMP/EIS.

The official public review process for the Ross Lake Draft General Management Plan and Environmental Impact Statement began on July 1, 2010 and ended September 30, 2010. The NPS intentionally held the public review period during the peak summer visitation season in order to provide opportunities for the visiting public to learn about the NPS’s preferred alternative for Ross Lake NRA and provide their comments on the draft plan. The draft plan and information about how to provide public comments were made available on the NPS and Planning, Environment, and Public Comment (PEPC) websites (www.nps.gov/rola and <http://parkplanning.nps.gov/rola>) on July 1, 2010.

The NPS also announced the public review process through a Notice of Availability published in the *Federal Register* (v75, n136, pp 41512-14) on July 16, 2010. In early July 2010, the NPS distributed approximately 160 paper and digital copies of the complete draft GMP/EIS to state congressional offices, local tribes, governmental agencies, and other interested organizations and individuals. The NPS also produced and mailed the Draft GMP/EIS Executive Summary Newsletter#3 to over 900 contacts on the mailing list. The newsletter fully outlined the four alternatives and encouraged the public to participate in the planning process. The public had opportunities to provide comments through attending a public open house, submitting comments on the NPS PEPC website, writing a letter or e-mail, or providing comments on the postage paid comment form enclosed in the newsletter. Dates, times, and locations for the public open houses were clearly listed in the newsletter and on the NPS and PEPC websites. Contact information for the public to either request more planning materials and/or comment on the draft plan was also printed in the newsletter and available on the web.

Press releases were prepared and mailed to local media in advance of the public open houses by the North Cascades NPS Complex staff, and a series of posters were distributed to approximately 35 locations throughout Ross Lake National Recreation Area and the region announcing the public open houses and requesting public comment.

Public Meetings and Written Comments

The NPS held six public open houses in Sedro-Woolley, Marblemount, Newhalem, Seattle, Bellingham, and Winthrop in July 2010. Seventy-seven people participated in these public open houses and provided oral comments.

The open houses began with a presentation of the draft general management plan and then transitioned into smaller facilitated discussions at three to six subject-based stations. Station topics included: the Skagit Corridor, Gorge and Diablo Lake Area, Ross Lake Area, Resource Protection, Boundary Modifications, and the Skagit Wild and Scenic River Designation Study. For open houses that had smaller attendance, some stations were combined for efficiency. Members of the public could visit any or all of the stations to provide comments and join discussions on these topics. Each station was attended by at least one, if not two NPS staff with expertise on the relevant issues. Staff took detailed notes on all comments which contributed to the record of public comments.

The following table lists the locations, dates, and number of people who attended each meeting:

Location	Date	Attendance
Sedro-Woolley, WA	July 21, 2010	9
Marblemount, WA	July 22, 2010	12
Newhalem, WA	July 24, 2010	19
Seattle, WA	July 27, 2010	13
Bellingham, WA	July 28, 2010	16
Winthrop, WA	July 29, 2010	8
TOTAL		77

The National Park Service received approximately 1,645 total comments on the draft plan by mail, e-mail, fax, hand delivery, oral transcript, and the Internet via the NPS Planning, Environment, and Public Comment (PEPC) website. A number of groups and individuals submitted duplicate comments by different means, and several people commented up to four times. Of the comments received, 7 were from agencies and elected officials, 5 from businesses, and 22 from organizations. The remaining comments were from individuals. Approximately 1,220 individuals responded by using one of two different form letters.

Range of Comments

The comments on the draft GMP/EIS covered a broad range of topics, issues, and recommendations for Ross Lake National Recreation Area. The comments were entered into the NPS Planning Environment and Public Comment database and analyzed.

The following topics received the most comments:

Alternatives

Approximately three quarters of the public comments received explicitly stated a preference for one of the alternatives over the others. Nearly all of these comments expressed support for the NPS preferred alternative and the future vision for Ross Lake NRA. Many people also stated support for the preferred alternative with one or more significant modifications. The most common suggested modifications were the conversion of portions of Ross Lake NRA to national park and allowing seaplanes to access all of Ross Lake. A few comments also favored Alternative A and Alternative D.

Connection to the “National Park”

Whether commenting on visitor facilities, recreational activities, interpretive programs, or boundary modifications, a dominant theme in the comments was an expressed desire for a “national park” experience while visiting Ross Lake NRA. While Ross Lake is an important and dominant feature in the landscape, most people’s affiliation to the area is with the North Cascades as opposed to Ross Lake. This sentiment came across particularly clear when talking about the relationship between North Cascades National Park, Ross Lake National Recreation Area, the North Cascades Highway, and the gateway communities. Numerous commenters expressed a desire to encourage people to understand the magnificence of this place, to learn about this national resource, and to ultimately get out of their cars and experience what this landscape has to offer. Particular comments encouraged the NPS to create a more distinguished “entrance” along the North Cascades Highway that welcomes visitors from both the east and west sides of the North Cascades NPS Complex. Many other commenters requested more opportunities to stop along the road, learn about the area, and perhaps day hike to a scenic vista. Others sought increased access to Ross Lake and surrounding areas and urged the NPS to improve visitor services and amenities to engage citizens from all ages, abilities, and interests.

Despite the topic, commenters made it clear that they value Ross Lake National Recreation Area and seek to enhance the experience of the place for both themselves and others.

Boundary Modifications

Many comments received by the NPS were in reference to **internal boundary changes**. Of these, several commenters requested that the NPS convert portions of the National Recreation Area to National Park designation, particularly along the North Cascades Highway and areas in the NRA that do not have hydroelectric features or activities.

Many commenters also requested that the NPS consider **external boundary modifications** in order to allow for more holistic management, assure the successful recovery of threatened or endangered species, and/or respond to threats within these surrounding lands. Some comments suggested that boundaries be based on ecological or hydrological functions/divides, and, related to this, some suggested

“While . . . the present working relationship between the National Park Service and the U.S. Forest Service is effective at protecting lands in the Skagit Watershed, this may not always be the situation in the future. Boundaries following hydrologic divides would provide for simpler and more consistent management in the long run . . . Boundary evaluation does not necessarily need to be part of the GMP, but the plan should explicitly allow for it.”

Public Comment



NPS staff speak with community members at Public Meeting in Sedro-Woolley, 2010.

“Preserve the character of Ross Lake. There are so few places with limited mechanization and noise.”

Public Comment

“I like advance trip planning. Keep it local though because park employees know usages and accommodations and what else is going on in the park.”

Public Comment

a formation of an international park between Canada and the United States. More specific comments recommended incorporating lands to the east such as the Skagit River, Baker River, Bacon Creek, and Cascade River Watersheds currently managed by the U.S. Forest Service, and sections of the Mount Baker Wilderness north of Mt. Shuksan. Some comments also requested that the NPS expand to the west to incorporate all or various sections of U.S. Forest Service lands in the upper Methow River watershed. Some commenters voiced their support of the NPS’s decision to not change their external boundaries. These commenters thought the changes in designation were unnecessary and some feared that the boundary changes would change the character of surrounding communities.

The NPS received numerous comments about the proposed boundary modification in the town of **Diablo**. While many commenters expressed support for the land exchange due to the number of opportunities for education, lodging, trailhead maintenance, and visitor services, other commenters voiced concern about future plans. Some of these comments referred to staff, budgeting, and operating costs. Others brought up safety concerns (both natural and human caused hazards) on the site and future needs such as a sewage treatment plant. Other commenters wanted to learn more about the NPS’s future plans for this site before expressing their support for this proposed land exchange.

Visitor Experience

The vast majority of comments on the Draft GMP/EIS discussed visitor experience within Ross Lake NRA. The areas of visitor experience that received the

most comments included: backcountry permit system, boating, climbing, concessions operations, hunting, interpretation, seaplanes, and soundscapes..

The NPS received many comments regarding an advanced trip planning option for **backcountry permits**. Some commenters expressed their support for such a change, and several suggested that this option be available online. Some commenters also expressed a great appreciation for the current system, noting the value of personal interaction with NPS rangers, and offered suggestions for how to create a balance between online and in-person permitting. Suggestions included: offering advanced trip planning for only a portion of current campsites, requiring confirmation or in-person pickup, allowing only certain user groups to access an online option, requiring commitment to “leave no trace” principles in an online system, and maintaining a shorter time frame for advanced trip planning. Several commenters requested that any permitting system remain “local”.

The NPS received many comments about **boating** regulations, ranging from opposition to any additional regulations to support for a complete ban of all motorized activity on Ross Lake. Several commenters questioned the need for additional boating regulations as motorboat access to Ross Lake is already limited in large part by the gravel road to Hozomeen. Other commenters also expressed concerns about safety (search and rescue and tree stumps in the northern section of Ross Lake) and the ability to access the entirety of Ross Lake if restrictions on boating were implemented. Other commenters urged the NPS to implement regulations on engine size and type, horsepower, zoning (concentrated use) and maintain its ban on personalized water craft and towing activities. Many commenters who said they favored the four-stroke engine requirement also requested that the regulation be implemented sooner than 2015. Several commenters requested additional or more stringent regulations on boating such as restricting the number of boats on Ross Lake, limiting access to only electric boats, or eliminating all motorized uses on the lake. Many people stated that the wilderness qualities of Ross Lake and natural soundscapes were justification for new restrictions. Some commenters also questioned the justifications for proposed regulations. A few commenters suggested that waves from wind are more responsible for erosion on Ross Lake than any boating activity. Two commenters also questioned the size of boats operated by Seattle City Light and the National Park Service, and several others questioned the four-stroke engine requirement, suggesting that this regulation may not ensure less pollution.



The Skagit River.

Most of the comments received regarding recreational **climbing** in Ross Lake NRA voiced “tentative support” for proposed climbing management areas. These commenters were in favor of maintaining if not improving access for climbers along the North Cascades Highway, but voiced concern over the process of defining these areas and the potential to limit climbing to the Skagit River area through this type of management. Some commenters expressed concerns about locating any climbing management area near hydroelectric facilities; some discussed locating parking lots around such areas; and some were concerned about the overall environmental damage to resources in these areas. Some of those particularly concerned about environmental impacts requested a full environmental assessment before designating climbing management areas and suggested that education be a part of this management proposal. Some comments also suggested that the NPS create a stand-alone climbing management plan. Comments about **concessions** in Ross Lake NRA generally referred to one of three topics: commercial air tours, Ross Lake Resort expansion, and suggestions for new concessions. Those that responded to commercial air tours voiced their support against this type of concession in favor of private pilots. Those that

responded to the Ross Lake Resort expansion varied from support of the expansion to concerns about the architectural consistency of new development, future transportation to the Resort, and the financial implications of any expansion. Suggestions for new concessions ranged from horse packing concessions to new lodging opportunities, as well as public transportation ideas such as a shuttle or ferry.

The NPS received several comments about **hunting** in Ross Lake NRA. Some of these comments raised concerns over impacts to wildlife populations, safety, education, and increased use. Other commenters expressed their support for the ban on lead-based ammunition.

The NPS received many comments in support of education and **interpretation** in Ross Lake NRA. Some of these commenters voiced general support for the NPS’s proposed “primary interpretive themes” and goals in the draft plan. Other commenters urged even greater support for interpretation through increased staff and funding. Additional commenters made specific suggestions for interpretation and visitor services within Ross Lake NRA. These suggestions ranged from increased services in Newhalem, to more

visitor services along the North Cascades Highway, information waysides along trails, extending seasonal operations, and expanding the climate friendly parks initiative. Many of these suggestions also encouraged increased cooperation between the NPS and the U.S. Forest Service, Seattle City Light, and other regional and local entities.

Many citizens submitted comments regarding the proposed regulations on **seaplanes** in the preferred alternative. These comments ranged from full support of a ban on seaplane landings and take-offs to full access for seaplanes. Some commenters expressed concerns over the impact of seaplane noise on natural soundscapes, wildlife populations, and the tranquil and pristine character of the reservoirs. Many of these commenters questioned the compatibility of seaplane use with the backcountry and wilderness character of Ross Lake NRA. In contrast, many commenters urged the NPS to reconsider the proposed limitations on seaplane access. Numerous reasons were stated for this reconsideration including: the historic use of seaplanes on Ross Lake, the nature and relative small size of the seaplane pilot community, the comparative impacts between boats and seaplanes, the lack of significant environmental impacts from seaplanes, safety concerns in different areas of Ross Lake, border control issues, and a desire to access prime campsites along the middle sections of Ross Lake. Many commenters also questioned the justification for such limitations. Other commenters suggested alternative approaches for managing seaplane use and suggested a noise abatement program and other soft approaches such as education and stewardship opportunities. Some commenters suggested a permit system that could be operated online. Others suggested changes to the proposed management zones such as limiting landing sites to seaplane accessible campsites. And others suggested placing time limits on operation, restricting flight elevation, limiting the number of landings and take-offs one pilot could do within 24 hours, or simply allowing seaplanes to deviate from rules during unusual weather conditions.

“Float plane landings and take-offs on Ross Lake are incompatible with the backcountry and wilderness experiences.”

Public Comment

The NPS received a number of comments regarding natural **soundscapes** in and around Ross Lake. Some commenters highlighted the importance of natural soundscapes and expressed concern about the impact of human caused noise on wildlife within Stephen Mather Wilderness. Many of these commenters voiced particular concern about the noise generated from motorcycles and other traffic on the North Cascades Highway and seaplanes on Ross Lake. To this end, some commenters voiced their support for the preferred alternative, its attention to these natural soundscapes, and its proposed concentration of noise in already developed areas (such as along the North Cascades Highway). Other commenters suggested that the NPS enhance education about soundscapes and increase support for soundscape monitoring programs. Some people proposed additional regulations to protect the natural soundscapes such as decreasing the size of proposed front country zones to further concentrate motor use, enforcing noise standards on all motor vehicles, encouraging use of EPA certified motors, and limiting administrative use of helicopters. Other methods for controlling human caused noise included creating “acoustic cushions” (areas where motorized vehicles are excluded) and promoting more non-motorized activity on Ross Lake. Some commenters requested that the NPS address in particular noise created by motorcycles in the general management plan.

In addition to the comments listed above, the NPS received other comments concerning bicycling, stock use, fishing, dogs, helicopters and other motorized aircraft, recreation along the Skagit River, and spiritual practices within Ross Lake NRA.

Facilities

The NPS also received numerous comments about current and proposed facilities in Ross Lake NRA. While these comments covered a range of topics, from signage to sustainability and energy conservation, the NPS received the most comments on trails, campgrounds, facilities in Hozomeen, facilities along the North Cascades Highway, and other transportation amenities.

Some comments responded to recommendations in the draft plan regarding **campgrounds** in Ross Lake NRA. A few commenters specifically voiced their support for the proposal to consider locating campgrounds near the aggregate ponds, but others were concerned about this proposal due to impact on salmon habitat and requested a

further analysis of what species would be impacted by such a development. A few other commenters suggested that the NPS add more campsites along Ross Lake or add a front country campground that would be accessible for stock. Other commenters were primarily concerned about operations of campgrounds, specifically requesting that the NPS maintain full control of the facilities rather than allowing a concessionaire to provide this service. Some commenters also discussed Colonial Creek Campground and steps the NPS would take if the campground was destroyed by a natural hazard. Some of these comments voiced support for relocating the campground if destroyed, but some voiced concerns over relocation. These commenters suggested that facilities should not be rebuilt in a hazard area, and if relocation was necessary, the new site should be located so as to minimize loss of important forest habitat.

Comments about **Hozomeen** generally referred to border control issues, facilities and development, and/or international coordination. Some commenters voiced their support for maintaining the gravel road to Hozomeen, citing the current access conditions as important to maintaining the character of the experience on Ross Lake. Some commenters expressed opinions about the proposed changes to the campgrounds, ranging from those in support to those against the proposal. Some commenters liked the proposal to improve facilities, particularly a ranger station if managed by both British Columbia and the National Park Service. Many commenters also urged the NPS to work with B.C. Parks to improve consistency across the border, whether through changes in information, regulations, camping fees, or overall quality of facilities. Some of these commenters suggested creating an international park.

Many citizens wrote to the NPS about hiking **trails** in Ross Lake NRA. Some comments voiced support for new proposed trails such as Happy Flats, Goodell Creek, and County Ponds, and some suggested closures or improvements to current trails such as the Gorge Overlook, Newhalem Creek, Sourdough, and Stetattle Trails. Many comments expressed the need for more, easy to moderate, mid-elevation trails that are varied for different audiences and accessible from the North Cascades Highway or Newhalem. Some of these comments specifically requested more loop trails, particularly to Thornton Lakes. Many comments also suggested specific new trails that could be added. These suggestions ranged from a new trail to the Pickett Range, to a trail to Silver Lake, a trail

up Ruby Mountain, a loop trail around Diablo Lake, and a Skagit River Trail. A few commenters were not in support of increasing the number of trails. Some commenters raised concerns for the location of new trails which ranged from border issues with Canada to concerns about over-development in Newhalem and protecting high quality and diverse wildlife habitat, particularly for grizzly bears.

The NPS also received a number of comments about roads and **transportation** within Ross Lake NRA. These comments ranged from suggestions to run a shuttle along the North Cascades Highway to building a tram up Ruby Mountain, operating a ferry on Ross Lake, regulating motorcycles and snowmobiles in the NRA, and increasing the number of turn-outs along the highway. A number of commenters also wrote to the NPS regarding the proposed addition of a water taxi on Ross Lake, some in support of the additional service and others against such an enterprise. Most transportation comments though referred either to the proposal to designate the North Cascades Highway as a **National Scenic Byway** or the proposal to close the last one mile of the Thornton Lakes Road at the wilderness boundary. Many commenters voiced their overall support for the designation of the North Cascades Highway as a National Scenic Byway, though some expressed concern about more federal bureaucracy and the continued closure of the highway during the winter.

In general, commenters who wrote letters about **Thornton Lakes** expressed support for closing the last mile of the road at the wilderness boundary. Commenters requested that the NPS rehabilitate the one mile of closed road, formalize a parking lot and trailhead at the wilderness boundary in an existing disturbed area, and upgrade the trail access to Thornton Lakes. Most commenters requested that this trail be constructed as a loop, along the ridge, and remain short in length. Some commenters also expressed concern about the size of the parking lot, and some expressed frustration, stating that the road should be kept open in honor of its historic use and high mountain access.

Many people also submitted comments about general facilities along the North Cascades Highway. A number of these commenters addressed the proposal to increase the footprint of the **Ross Dam Trailhead Parking Lot**. While some commenters saw the need to increase the size of the lot to accommodate traffic, others were concerned about the size of the footprint and the impact on fauna. Other commenters also

wrote to the NPS about the location of the **Wilderness Information Center**. Most individuals commenting on the Wilderness Information Center requested that the NPS relocate the facility along the North Cascades Highway in Marblemount, although a few expressed concerns about physically separating the functions in that office. Other commenters were concerned about general development along the North Cascades Highway and the proposal to widen the **Skagit Bridge** in Newhalem. Some commenters expressed frustration at the expense of the bridge, stating that the money could be better used elsewhere and was not needed, but many others expressed the need for a new bridge to encourage more use of the North Cascades Visitor Center. In general, comments ranged from demanding more opportunities to engage with the National Park along the North Cascades Highway to stating that the development along the road was sufficient for visitor contacts.

Resource Management

The NPS received numerous comments relating to **grizzly bear management** and development of Core Areas within Bear Management Units. A few commenters voiced concerns about the impact of the NPS's proposed management strategy on human/bear contacts while other comments voiced overall support for the restoration of grizzly bears in Ross Lake NRA and North Cascades National Park. Most of the comments pertaining to this topic urged the NPS to reassess the proposed retention of 70% Core Area, as many commenters believe that this percentage is too low. Some of these commenters questioned the standard for the following reasons: 1) they wondered how the 70% Core Area would be measured either as an average of cumulative or individual Bear Management Unit, 2) they questioned the scientific accuracy of that estimation, given the current condition of 82-92%, and pointed out differences between Yellowstone National Park and the North Cascades for potential different grizzly bear uses of habitat, and 3) they wondered how this proposal would impact trails and other developments. Several other commenters differentiated between early, mid, and late season habitats and requested that any siting of trails be based on science and avoid high quality habitat. Some comments requested that the NPS strike a balance, if not favor, grizzly bear habitat over constructing new trails while other comments recommended that Bear Management Unit Core Areas see no net loss. Some comments also addressed food storage and the importance of public education in light of grizzly bear recovery.

Other resource management topics that were addressed by comments include: climate change, visitor capacity and its effects on resources, cultural resources, support for Class I Airshed Designation, habitat fragmentation, water resources, water quality, watershed management, invasive species, night sky, mineral and timber extraction, and mushroom foraging.

Wilderness

The NPS also received a number of comments concerning the wilderness character of Ross Lake NRA and the North Cascades NPS Complex. Many of these comments expressed appreciation of the wilderness character of these lands and requested that the NPS create a balance between protecting this character and promoting access to the area. A number of people also wrote to the NPS in full support of the proposal to recommend converting **Thunder Creek Potential Wilderness** to designated wilderness. Some commenters also requested that the NPS convert Big Beaver Potential Wilderness as well.

Skagit Wild and Scenic River Eligibility and Suitability Studies

Many citizens wrote to the NPS concerning the **Skagit Wild and Scenic River Studies**. A few commenters thanked the NPS for embarking on such a project and for the quality of information included in the document. Many others voiced their overall support for the proposal to recommend Wild and Scenic River designation for the segment of the Skagit River from Gorge Powerhouse to the Ross Lake NRA boundary, Goodell Creek, and Newhalem Creek. Some of these comments were particularly pleased about the possibility of further protecting the Skagit River between Goodell and Copper Creek. Reasons given for support of this designation included the potential for cohesive management with the U.S. Forest Service of the designated segment of the Skagit River; increased recognition for the Skagit River,

"We are long-time river rafters and we return again and again to this section of the Upper Skagit as a respite. It's very important to us that this section of the river be protected by the Wild and Scenic designation."

Public Comment

Goodell and Newhalem Creeks; the value and beauty of the North Cascades ecosystem; and the recreational opportunities provided by the river system. Only a few commenters expressed their disappointment that several other creeks including Thunder, Fisher, Ruby, and Big Beaver were not included in this study. Some of these commenters encouraged the NPS update the eligibility and suitability analysis for these other creeks in the future as proposed in the draft plan.

Partnerships

Many commenters wrote to the NPS about **partnerships** with the U.S. Forest Service, Seattle City Light, British Columbia Parks, tribes, and gateway communities. Most of the comments addressed interpretation, education, and visitor services that could be coordinated between the NPS and these partners. Some of these comments commended the interagency work with regards to recreational and preservation projects and requested that SCL tours continue. Other comments suggested that the NPS create joint visitor centers in Winthrop or Twisp, Marblemount, and at Washington Pass. A few other comments addressed resource management concerns, particularly with reference to noise along the North Cascades Highway and with debris on the northern end of Ross Lake. Of the comments that addressed cooperation with B.C. Parks, most urged the NPS to improve the consistency of regulations with B.C. Parks with regards to visitor contact, resource management, and use permits. Comments that addressed gateway communities criticized the draft plan for ignoring crucial local businesses and encouraged the NPS to use the North Cascades community as an important resource for addressing NPS needs.

Operations

The NPS also received a small number of comments concerning the operation of Ross Lake NRA. They included comments about funding, Seattle City Light operations, and staffing.

Planning

Some people also commented about specific components of the GMP and the planning process, including the foundation statement, management zoning, and the public involvement opportunities during the general management planning process.

Additional Comments

In addition to the comments referenced above, some commenters requested actions that were too detailed for the plan, were outside the scope of the general management plan, were considered in other plans, or could be achieved through other methods outside the general management plan process. Some comments were more relevant to implementation plans, provided site specific ideas that would be used in future planning efforts, or would be more appropriately addressed through the regulation and rulemaking process. Some commenters presented alternatives that are not reasonable, presented personal opinions or grievances, or presented alternatives that are outside the jurisdiction of the National Park Service.

“Working cooperatively with Canadian agencies in all areas of park protection is an important aspect of the GMP.”

Public Comment



Members of the public share their comments about the ROLA GMP with NPS staff.

Changes and Clarifications to the Draft GMP/EIS

Numerous changes were made to the *Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement* as a result of comments are summarized below. This list includes the major changes that have been made to the preferred alternative. This list does not include all the changes that were made to clarify points, provide additional rationale for decisions, or correct minor errors or omissions.

- Recreational uses, such as seaplane use and sport climbing, have been modified
- Grizzly bear management has been updated with additional information and guidance
- Future uses and land acquisition at Diablo Townsite has changed, including removing the option for an exchange of Reflector Bar for Hollywood
- A name change from Ross Lake National Recreation Area to North Cascades National Recreation Area has been added
- Guidance for several visitor facilities has changed, including the bridge over the Skagit River at Newhalem, trails and trailheads, the boat launch at Colonial Creek Campground, parking areas, and camping locations

List of Commenters

The following is a list of federal, state, and local governments; businesses; and interest groups and organizations that provided comments on the draft plan. These comment letters are included in this volume. Names of private citizens are not included in the list, and due to the extensive number of comment letters, are not included in the final volume. Copies of the letters that are required for inclusion are in the section following the “Substantive Comments and Responses” section. Copies of all letters are available in electronic format, with individual names and addresses removed, and are available upon request.

NOTE: Letters are numbered by the National Park Service Planning, Environment, and Public Comment (PEPC) system and are part of a nationwide database; therefore, the numbers are not in chronological order (The comment letters in this document are also not in this order).

“I have been hiking, camping and climbing in the Washington Cascades and Olympic mountains for over 40 years. My experiences there have frequently been almost religious as I have enjoyed the beauty and majesty of these marvelous areas.”

Public Comment



NPS staff discuss camping facilities in Hozomeen, Bellingham Public Meeting, 2010.

Table 7.4 Commenters on Draft GMP/EIS, 2010

PEPC ID	Log #	Commenter
Federal, State, and Local Governments		
1625	26	United State Environmental Protection Agency, Region 10
3	474	Washington State Department of Transportation, Aviation
1632	887	Whatcom County Commissioner Carl Weimer*
811	1000	Seattle City Light
1626	470	State of Washington Department of Archeology and Historic Preservation
578	956	Washington State Department of Transportation, Northwest Region/Mount Baker Area
Businesses		
48	515	Aeromarine Publishing Corp.
347	467	Kenmore Air Harbor, Inc.
1631	719	Law Offices of Ronald A. Stearney
723	636	Tanglefoot Seaplane Base
Interest Groups and Organizations		
813	889	Access Fund*
13	28	Airports and State Advocacy
812	999	American Rivers*
812	999	American Whitewater*
691	604	Aviation Foundation of America, Inc.
727	640	Columbia Seaplane Pilots' Association
686	599	Lake Amphibian Flyers Club
138	692	League of Northwest Whitewater Racers
762	1028	Montana Seaplane Pilots' Association
825	4	National Historic Lookout Register
411	886	National Parks Conservation Association
577	955	North Cascades Conservation Council
833	1667	North Cascades Institute
13	483	Aircraft Owners and Pilots Association
700	613	Recreational Aviation Foundation
721	634	Seaplane Pilots Association
1632	887	Sedro-Woolley Chamber of Commerce*
495	952	Skagit Audubon Society
524	953	Skagit Environmental Endowment Commission
813	889	Washington Climbers Coalition*
68	535	Washington Seaplane Pilots' Association
812	999	Washington Wilderness Coalition*
819	883	Wilderness Society
Form Letters and Petitions		
158	32	National Parks Conservation Association - Form Letter - 423 Received
638	454	National Parks Conservation Association - Form Letter - 795 Received

*Letter written jointly with another agency, business, or organization. Letters are reprinted only once, under first listing (alphabetical by type of organization).

SUBSTANTIVE COMMENTS AND RESPONSES ON THE DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

This section summarizes the comments received following the release of the *Ross Lake NRA Draft General Management Plan and Environmental Impact Statement* on July 1, 2010. All written comments were considered during the preparation of the final general management plan and environmental impact statement in accordance with the requirements of Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503).

The comments allow the planning team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals related to the preferred alternative, the other alternatives, and potential impacts. It is important to stress that the selection of the preferred alternative and revisions to the alternative are not based on how many people supported a particular alternative.

Analysis of Substantive Comments on the Draft Plan

Consistent with the requirements of 40 CFR 1503, the NPS staff provided written responses to those pieces of correspondence that have either substantive comments or comments that the NPS planning team determined written response was required for clarification.

Substantive comments are defined by Director's Order 12, "Conservation Planning, Environmental Impact Analysis and Decision-Making" (NPS, 2001) as those comments that:

- Question, with reasonable basis, the accuracy of information in the environmental impact statement.
- Question, with reasonable basis, the adequacy of the environmental analysis.
- Present reasonable alternatives other than those presented in the environmental impact statement.
- Cause changes or revisions in the proposal.

Substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the preferred alternative or alternatives, or those that only agree or disagree with NPS policy are not considered substantive.

NPS Responses to Comments

Comments that contain substantive points regarding information in the draft GMP/EIS or comments that need clarification are extracted below. A concern statement has been developed to summarize the comment, but representative quotes are also included from original letters, edited only for style consistency and spelling. All comment letters from agencies, organizations, and businesses have been scanned and are included in this volume.

Where appropriate, text in the *Ross Lake National Recreation Area Final General Management Plan and Environmental Impact Statement* has been revised to address comments and changes, as indicated in the following responses. Unless otherwise noted, all page number citations refer to the *Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement*.

Boundary

Boundary Modifications

Boundary Concern 1: Convert the southern portion of Ross Lake NRA to "national park."

Representative Comment:

"The most significant modification is our request to include a boundary adjustment that will bring North Cascades National Park closer to park visitors. Highway 20 is the major route through the heart of the North Cascades Complex but, as we know, it is all within the Ross Lake NRA and the park can only be seen through the windshield. We strongly urge the Park Service to adjust the boundary of Ross Lake to include much of the Highway 20 corridor, including the areas identified as Frontcountry Zone, Backcountry Zone, Wilderness Zone, and Skagit River Zone in the national park... The Hydroelectric Zone would remain part of the Ross Lake NRA. Visitors come to the greater North Cascades Ecoregion because of its wildlife and natural wonders and for the area's recreational opportunities, including its visitor center, trails and campgrounds. Sustaining and protecting these important recreation and natural values while also working to increase that visitation is

critical to a sustainable and healthy local economy and environment. . . . We feel that redrawing the boundaries of the Ross Lake NRA to provide the opportunity for highway visitors to actually be within the North Cascades National Park proper will likely increase visitation and it is a low cost way of improving the visitors' experience. Also, this will provide for better protection of natural and cultural wonders."

Response:

The NPS considered a variety of internal boundary modifications and name changes in order to achieve the goal of providing highway visitors with a "North Cascades" and "national park" experience. However, due to the initial designation of the Ross Lake NRA and the presence of three hydroelectric facilities within this NPS unit, the NPS recommends retaining the "national recreation area" designation and current boundaries, and instead proposes to rename the Ross Lake NRA as the "North Cascades National Recreation Area." This proposal, which would require congressional designation, is included in the final GMP/EIS.

While the NPS understands the appeal of a "national park" designation, the NPS believes that changing the actual boundary to include much of the North Cascades Highway (Highway 20) corridor would not advance the purpose of Ross Lake NRA. The Congressional intent for the designation of Ross Lake NRA in 1968 was to establish a unit of the NPS that would preserve the majestic scenery of the area and offer a variety of recreational opportunities, all while maintaining hydropower projects on the Skagit River and at other locations. The NPS believes that this boundary change proposal would not substantially improve the protection of resources since all lands within the Ross Lake NRA and North Cascades National Park, regardless of designation, are managed and consistent with the laws and policies that guide management of all units within the national park system. Changing the boundary of Ross Lake NRA and converting these areas to North Cascades National Park would likely result in additional restrictions on recreational activities such as hiking with dogs, motor boating, and hunting, which are currently permitted within a national recreation area but not within a national park. Finally, any conversion of the lands containing the two Federal Energy Regulatory Commission's (FERC) licensed hydroelectric projects in Ross Lake NRA (the Skagit Hydroelectric Project, #553 and the Newhalem Hydroelectric Project, #2705) to national park would result in the loss of the NPS's mandatory conditioning authority. This authority,

granted under Section 4(e) of the Federal Power Act (16 U.S.C § 797(e)), allows the NPS to mandate conditions under FERC's licensing process for the adequate protection and utilization of the NPS unit. Since this authority only applies to national recreation areas within the national park system, and not national park units, Ross Lake NRA would lose this authority if the boundary of Ross Lake NRA was changed and the southern portion was included in North Cascades National Park.

Furthermore, Ross Lake NRA contains concentrated areas of development, vast expanses of water, and rugged mountain wilderness. The concentrated areas of development are located in the southern portion of Ross Lake NRA along the North Cascades Highway, in Newhalem, Diablo, and include the hydropower facilities associated with the Skagit River Hydroelectric Project. It is this most developed and industrialized portion of the NRA that this commenter proposes for conversion to "national park," leaving the most undisturbed and pristine areas in the NRA. While the proposal would link the north and south units of North Cascades National Park, the focus of the conversion is more about visitor perception, the identity of the national park, and attracting more visitors to the North Cascades.

The NPS also considered, but ultimately dismissed, an alternative idea to align the NRA boundary with the Skagit River Hydroelectric Project boundary and convert the remainder to a "national park" designation. However, the hydroelectric project boundary has changed in the past during the re-license process at the request of Seattle City Light, and it is realistic that Seattle City Light could request future boundary changes for their hydropower operations. If these changes were requested and made, the boundaries of the NRA and national park would not align with the new hydroelectric project boundary. Therefore, maintaining this alignment in the future would be complicated and difficult to adjust with each additional hydroelectric boundary change.

In order to address the public concerns about the desire for an improved connection to the "North Cascades" and the park, while understanding the implications and benefits of maintaining the national recreation area designation, the NPS proposes a name change from Ross Lake National Recreation Area to North Cascades National Recreation Area. The name North Cascades National Recreation Area would be consistent with the North Cascades National Park units to the north and south, the names of the visitor

facilities currently located within the NRA, and with the concept of naming the recreation area after the mountain range in which it resides. While the name of the national recreation area would change under this NPS proposal, authorized activities including hunting and hiking with dogs would not change and would continue in the North Cascades National Recreation Area.

Congressional legislation would be required to authorize the name change from Ross Lake National Recreation Area to North Cascades National Recreation Area.

Boundary Concern 2: Additional boundary changes could better protect the North Cascades NPS Complex and achieve ecosystem management.

Representative Comment:

“NCCC raises the issue of RLNRA boundary changes to better protect the North Cascades NPS Complex and to achieve management on an ecosystem basis. At a minimum, the Final RLNRA GMP EIS should acknowledge the lack of ecosystem-based boundaries and assess the continuing impacts on Park resources and management.”

Response:

The NPS agrees that the current boundaries of Ross Lake NRA and the North Cascades NPS Complex are not aligned along ecosystem-based boundaries which can create additional challenges for protection of NPS lands. In response, this issue has been more explicitly stated in the final GMP/EIS. However, the NPS does believe the impacts and challenges of ecosystem management provided by the current boundary alignment have been reasonably disclosed.

The NPS has considered but dismissed proposing to expand the Ross Lake NRA boundary along ecosystem-based boundaries due in part to the limited current or reasonably foreseeable problems on adjacent lands that would warrant such a proposal. The lands surrounding Ross Lake NRA are largely managed as wilderness by the USFS or as some form of protected status across the border in Canada. Those lands that are not presently designated as wilderness (or some other protected status) are not notably threatened by adverse development or incompatible uses. In addition, very few public comments were received on this issue, and comments from the USFS indicated concern for expansion of the NPS boundary. These circumstances would seem to suggest little public support for legislative action to expand the boundary. Absent public and agency

support, proposals for expansion could fail. For these reasons the NPS does not support legislative action to realign the boundaries along ecosystem lines such as watersheds. Instead the NPS believes time and energy would be better spent improving interagency coordination for ecosystem management purposes.

Boundary Concern 3: Commenters provide new information for boundary proposals at Diablo Townsite.

Representative Comments:

“Recent federal security restrictions and other requirements have forced City Light to reconsider plans of land exchange at Hollywood and Reflector Bar. Critical staff for City Light will now be housed in Hollywood and not Reflector Bar as previously planned. The cookhouse and all housing and residential storage facilities at Reflector Bar will be removed. City Light is open to continued negotiations regarding possible partial sale of the Hollywood property that might include some or all of the houses. City Light is also open to discussions with NPS on the rental or lease of some number of houses in Hollywood. In lieu of this, City Light plans to remove all houses not immediately on Diablo Road with the exception of House 6 and the emergency response structures. City Light is committed to working with the NPS to improve access to and visibility of the Stetattle Creek and Sourdough Mountain trails. In addition, City Light will work with the NPS in designing the interior of the Ross Lodge in a manner that will meet NPS needs for a facility in Diablo.”

“Regarding the Diablo Townsite, we support the general concept of reallocation of ownership as described in Alternative B as it appears to be in the best interest of the public. . . Additionally, we have a concern about the impact on the access of the trailhead that currently comes out of Reflector Bar. We want to be sure that this access will be maintained even if the NPS no longer owns the land.”

Response:

The NPS recognizes the changed circumstances regarding security concerns for Diablo Townsite and respects Seattle City Light’s decision to rescind their proposal for a land exchange of Hollywood for Reflector Bar. Should circumstances change, the NPS would be interested in acquisition of Hollywood in the future, given that the property is within the legislated boundary of Ross Lake NRA. In the meantime, the NPS also remains interested in adaptively reusing some number of houses in Hollywood for the NPS and its partners. The NPS also supports consideration of a possible partial purchase of the Hollywood

property in the event that Seattle City Light is a willing seller.

As a separate but related matter, the NPS remains committed to improving the trailheads for Sourdough and Stetattle Creek trailheads in an effort to make these more welcoming to visitors. To that end, the NPS and SCL will continue to collaborate on a plan to combine the trailheads so they are easier to find, adaptively reuse facilities as appropriate, and provide parking, picnic and restroom facilities.

Visitor Experience

Backcountry Permits and Reservations

Concern: Commenters requested additional information or clarification of proposals for the backcountry permit system and provided suggestions for alternatives to consider.

Representative Comments:

“We believe that the existing reservation system for recreation in the North Cascades National Park Complex is cumbersome and discourages park use. We support creation of an on-line reservation system for all areas of the RLNRA (and the North Cascades National Park). However, to discourage spurious reservations, it would be good if the system required a confirmation within two days before use and that a portion of the recreation sites be set aside for on-site reservation.”

“Any backcountry permitting system should be a combination of day-of use and reservation. Given the current technology, it seems a little out of date to not have an online system. You could even have the system force people to click through and agree to regulations.”

“Online permits: I want to know what the capacity is at different locations. This would help with trip planning. . . .I like picking up permits in person and talking to people which seems to help with education and enforcement. Rangers have personal familiarity with places and can provide current info (e.g. bear activity).”

“[W]ould [backcountry permits] all be done on-line in the future? Or would the option to do it in person still be there? I think it is obviously valuable to keep the latter as an option for those who need help planning their trip. Also, how far in advance could permits be issued?”

Response:

Many commenters asked for more details about an advance permit (reservation) system. Although complete details of such a system are beyond the scope of this plan, the final GMP/EIS has been updated to include some known changes to the permit system (Chapter 4, p. 95-96). Thus far, the NPS has determined that some number of advance permits would be available on-line for a fee (the fee is required to cover the cost of the reservation system), with a portion of permits held for walk-ins. All advance permits, where feasible, would require conversion to an active permit via an in-person contact at a ranger station within one day prior to the start of the backcountry trip.

The primary purpose of the in-person contact is for education and safety, so that rangers can discuss current conditions, low-impact techniques, and wilderness protection. Although some of this information can be provided on-line (such as regulations), an on-line checklist is not considered as effective as personal interaction in planning a reasonable trip or conveying an educational message, nor can it reflect recent changes in conditions such as wildfire, weather, wildlife interactions, etc. The requirement for the permit conversion no more than one day in advance allows the NPS to track which reservations cancel or change at the last minute and prevent no-shows from occupying sites that could be used by other visitors. Overall, the permit process would be streamlined. The advance permit to active permit conversion would be quick and simple, and advance permitting could alleviate some visitors’ concerns about getting a campsite.

Beyond these measures, the NPS would ensure any advance permit system supports the original purpose of the permit system, as articulated in the 1989 Wilderness Management Plan and other management documents. The purpose of the permit system is to disperse visitor use, reduce crowding and conflicts, and provide information and education about safe and low-impact wilderness and backcountry use, thereby providing a quality wilderness experience that protects natural resources. In designated wilderness, the permit system helps ensure the preservation of natural conditions and a sense of solitude, which are characteristics of wilderness defined by the 1964 Wilderness Act. Further parameters of any on-line advance permit system, beyond those listed above, cannot be determined until funding is obtained and a detailed analysis is undertaken. When creating such a system, the NPS would consider public comments

and effects on all user groups, as well as administrative costs and fiscal constraints. Finally, this GMP proposal applies only to Ross Lake NRA, and not the entire North Cascades NPS Complex, but any advance permit system would allow for scaling up to the entire North Cascades NPS Complex as future planning processes (i.e. wilderness management planning) provide direction and give all stakeholders a chance to comment. This language has been clarified in the main text of the final GMP/EIS.

Boating

Boating Concern 1: Existing conditions provide adequate limits on motorboat recreation on Ross Lake and additional regulations are not warranted.

Representative Comments:

“The poor access road to...Hozomeen already restricts the number of powerboaters enough.”

“The number of powerboaters on the lake is hardly enough to disrupt the existing soundscape...In the ten years we have been vacationing there, I would say that we see an average of 1 or 2 private powerboats larger than 10 horsepower per day in the ‘backcountry.’ We see more Ranger boats or Seattle City Light boats in the “backcountry” than private boats greater than 10 horsepower.”

“The existing soundscape is already disrupted by the Seattle City Light chain saws and diesel engine driven log towing boat. That log towing boat is operating at wide open throttle towing logs most of the day. Any boat that has to tow those big log booms is going to be way louder than any private powerboat.”

“Ross Lake is a large lake. Usually horsepower limitations are found on smaller lakes where safety is a concern with congestion. Congestion is definitely not a concern on Ross Lake.”

Response:

The NPS agrees that the current experience on Ross Lake is characterized by few powerboats, mostly smaller than 10 horsepower, and the access to Ross Lake is a primary factor in limiting the number of motorboats on Ross Lake. In an effort to preserve the experience on Ross Lake, a number of strategies and regulations are included in the final GMP/EIS related to powerboat use in the NRA. The primary tools for managing motorboats would involve maintaining and not expanding or improving the current access to and infrastructure on Ross Lake. In discussions with the British Columbia (B.C.) government, the

NPS understands that B.C. does not have any plans for improving access to Ross Lake (e.g. there are no plans to upgrade the road from Hope, B.C. to Hozomeen) or adding substantial new facilities in the Skagit Provincial Park. Additional regulations, such as the Clean Engine requirement and requirement for four-stroke or equivalent engines, would not only help maintain soundscapes on Ross Lake, but other values including water quality. These requirements are consistent with EPA regulations. Additional regulations, such as horsepower, size, and speed limits would be implemented in the future should congestion become a problem, soundscape concerns persist, or other assumptions change. The final GMP/EIS has been updated to clarify the point at which these measures would be implemented.

The NPS also recognizes the role it plays in contributing to the character of the experience on Ross Lake, including the impact its own operation of motorboats has on the quality of visitor experiences, including natural soundscapes. New language has been added to the final GMP/EIS that provides guidance for how NPS motorboat operations can help achieve the goals for maintaining a tranquil experience on Ross Lake.

Boating Concern 2: Clarify how motorboats may use Ross Lake under the management zoning proposed in Alternative D.

Representative Comment:

“The Northern ‘Frontcountry’ [zone in Alternative D] is too shallow for higher horsepower boats to safely use. Tree stumps sticking up from the bottom in shallow water will tear the outdrive off a boat and cause the boat to sink...If that is one of the two only zones for powerboaters, people will think it has been deemed ‘safe to use’ and families will get hurt. Also, how is a higher horsepower boat supposed to get down to the South ‘frontcountry’ without passing through the restricted ‘backcountry’?”

Response:

In Alternative D, motorboats would be allowed in all zones on Ross Lake. The only motorboat activity that would be restricted to the “frontcountry” zone is recreational towing, such as waterskiing. It would still be possible for boats to travel the length of Ross Lake, passing through the “backcountry” portion of the lake, and resume these activities on the other end. It should also be noted that Alternative D is not the NPS’s preferred alternative.

Boating Concern 3: Consider additional prohibitions on motorboats in Ross Lake NRA.

Representative Comments:

“I think that [motorboats] should also be banned on Gorge Lake, on most of Ruby Arm on Ross Lake (east of the campgrounds), and on most of Thunder Arm on Diablo Lake, particularly near Colonial Creek Campground and the Highway 20 bridge. I’m also wondering if motorboat usage near campgrounds should be forbidden from 8 or 9 PM at night until 7 or 8 AM in morning, to make sleeping and breakfasts and campfire events more peaceful (particularly NPS interpretive campfire events?)”

“I would like to see all motorboats eliminated.”

Response:

While the NPS agrees that non-motorized recreation activities are low-impact and desirable forms of recreation, the NPS does not agree a full ban on motorboat activity within the NRA is reasonable or justified. Motorboating is prevalent on the three reservoirs within Ross Lake NRA and is currently an efficient way to transport visitors and NPS, SCL, and Ross Lake Resort staff and materials. A ban on motorboats is therefore inconsistent with the goal of the NRA to provide a wide variety of recreation for visitors and could negatively impact the efficiency of NPS maintenance, law enforcement, and potentially search and rescue work. Additionally, the NPS knows of no adequate scientific data – on water quality, social science, or noise - to support such a ban.

Based on relatively limited road access, and no plans to upgrade road access, the NPS does not anticipate substantial growth in motorboat use on Ross Lake. Based on continued siltation of the public boat ramp on Diablo Lake, the NPS does not anticipate substantial increase in motorboat use on Diablo Lake. Considering the number of comments received that expressed a desire to “preserve the quality of the experience on Ross Lake,” which included the types of boating that are characteristic of today’s activities, and the lack of justification for a ban, the NPS rejects the proposal to ban motorboats entirely.

Rather, in order to achieve the goal of maintaining the experience on Ross Lake, the NPS proposed a variety of measures to manage and monitor motorboat usage across the reservoirs as opposed to restricting the activity in certain locations on the reservoirs. Providing guidance for motorboats and motorboating in general is more feasible to implement and monitor than trying to limit the activity on certain portions

I like that you only see a few boats on Ross Lake. It is unique. Preserve this tranquility.

*Public Comment from
Bellingham Public Meeting*

of the reservoir. Other techniques for managing motorboating, such as quiet hours, could be done operationally through the park’s normal operational procedures and articulating specific quiet hours is too detailed to include in a long-range programmatic plan.

Boating Concern 4: Accelerate the deadline for converting to four-stroke engines to improve air and water quality.

Representative Comment:

“[T]he exclusive use of four-stroke engines should be required sooner than 2015 since these engines are easily accessible on today’s market and significantly reduce water pollution from the inefficient two-stroke. NPCA supports the use of four stroke engines but is concerned that use of direct-injection two stroke engines could allow significant pollution of Ross Lake to continue. The elimination of more polluting motors would help in the effort to redesignate the NRA Airshed from Class II to Class I.”

Response:

While four-stroke engines may be easily accessible in today’s market, the NPS needs adequate time in order to inform and educate the public about proposed changes for implementing a clean engine requirement in Ross Lake NRA, including exclusive use of four-stroke engines or equivalent technology. In the interim, the NPS and Ross Lake Resort have converted nearly all of their boats to four-stroke engines. These boats are the most prevalent and frequently operating boats on Ross Lake, which will help accelerate the elimination of more polluting motors prior to 2015. Ross Lake Resort voluntarily converted their boats to four-stroke engines and the NPS appreciates their leadership on this issue. Furthermore, the 2015 deadline does not preclude individuals from converting to four-stroke engines sooner, as demonstrated by the NPS and Ross Lake Resort. The deadline provides a reasonable amount of time to implement and enforce the conversion. The conversion of these boats to four-stroke engines should also help efforts to redesignate the Ross Lake NRA airshed to Class I. The NPS has determined that 2015 is an appropriate deadline for implementation

and will provide time needed to develop and distribute signs, information, and any additional public information necessary to implement such a requirement.

Boating Concern 5: Consider other standards, such as Environmental Protection Agency regulations, for managing motorboats.

Representative Comment:

“[D]on’t limit the lake to 4 stroke motors as there are 2 stroke motors that pollute less than some 4 strokes. If you are going to limit motors, limit them to some kind of EPA or similar regulation that applies to boat motors.”

Response:

The preferred alternative does allow for more than just four-stroke engines; it states “or equivalent” to address alternative or future technological advances. This proposal is consistent with EPA’s proposals for emissions standards for marine spark-injection engines and vessels. The final GMP/EIS has been updated to provide additional information that clarifies the goal of this proposal as a clean engine requirement and includes the link between NPS proposals and the final EPA rule for gasoline spark-ignition marine engines.

For additional information on EPA’s standards and final rule published in 2010, please visit EPA’s website at <http://epa.gov/otaq/marinesi.htm>.

Boating Concern 6: Additional clarification and detail is needed for proposals to manage motorboats.

Representative Comment:

“[T]he vagueness of management controls (horsepower, boat size, and/or speed limits, etc.) is disconcerting as these are the kinds of details that need to be addressed in a General Management Plan. NCCC is generally in support of the directions proposed but we would have liked to see more detail. Will these details be addressed in future Management Plans?”

Response:

The GMP is a long-range, programmatic document that is used to guide future decision-making within Ross Lake NRA. Therefore, determining the specific details for horsepower, boat size, and/or speed limits is beyond the scope of this plan. Rather, implementing the GMP recommendations and setting specific numbers or details for regulations would be done through the operational and rule-making procedures

available to the National Park Service under 36 CFR 1.5 which allows the superintendent to implement closures or set public use limits. The NPS is relying on the relatively difficult access for motorboats and the fact that there are no plans in the U.S. or Canada to improve road access and make it easier to bring powerboats to Ross Lake. While the NPS does not propose developing a separate management plan such as a boat management plan to implement these recommendations, the NPS would provide opportunities for public involvement as the specific details of these recommendations are proposed, evaluated, and decided. The NPS would also consider the best available science, technology, and information at the time in order to determine the details of the regulations.

Climbing

Concern: Additional guidance or clarification on the process of establishing climbing management areas, or more information on specific climbing areas, is needed.

Representative Comments:

“I need clarification from the NPS on the exact geographic scope of the allowed ‘Climbing Management Areas’ and on the process and timing for actually getting NPS approval for designating new climbing management areas.”

“It is difficult to determine if climbing could present access or security issues at City Light’s facilities without knowing the exact location of the four areas agreed upon between the NPS and the climbing community. City Light is concerned about existing and new routes that require access across the Gorge Bypass Reach and/or parking along Highway 20 between Newhalem and Diablo. Public access to the Gorge Bypass Reach is prohibited due to potential hazards from water releases from Gorge Dam. In addition, parking along the narrow road between Newhalem and Diablo is a safety hazard that will require coordination with the State Department of Transportation.”

Response:

An Interim Agreement between the NPS and the Washington Climber’s Coalition was completed in 2008 regarding the establishment of new rock climbing routes in the Skagit Gorge area of Ross Lake NRA. The Interim Agreement specified that this GMP would provide new guidance on rock climbing in Ross Lake NRA and replace the guidance provided in the Interim Agreement. The Interim Agreements stated that new climbing routes could

be established at the Diablo Crag, Newhalem East, Newhalem West, and Town Crags. In practical terms this would mean sport climbing and development would continue to be authorized in these same areas. The Interim Agreement is accessible on the internet at: <http://www.nps.gov/noca/parkmgmt/loader.cfm?csModule=security/getfile&PageID=223642>

With regards to designating new climbing areas, the NPS would work with the climbing community to establish additional Climbing Management Areas (CMA's) in the Skagit River Gorge between Diablo and Newhalem on a case-by-case basis. Consideration of new CMA's would begin with advance written request to the superintendent. Approval of CMA's would then follow the same basic process as approval of new trails within the park, including a site specific evaluation of resources and values at risk of damage from route development and use.

The geographic scope for future CMA's could include the Skagit River Gorge between Diablo and Newhalem, except for areas zoned wilderness where installation of bolts and use of mechanized equipment is prohibited by national NPS policy. The Gorge bypass reach of the Skagit River would also continue to remain off limits due to the risk of sudden releases from Gorge Dam.

Concessions

Concern: Clarify what is included in the 10% expansion of Ross Lake Resort as well as the second water taxi and relationship to Ross Lake Resort.

Representative Comments:

"Would [a second water taxi] be in conflict with the services presently offered by Ross Lake Resort? Would the new taxi service be housed at Ross Lake Resort?"

"I am concerned about the 10% expansion of Ross Lake Resort and SCL's ability to supply transportation to the resort considering the fact that their visitor services are decreasing."

Response:

The GMP would allow the number of beds at Ross Lake Resort to expand by 10%. It would be up to the concessioner to decide how the bed spaces are allocated, as either employee or visitor beds or a mix of the two. This expansion was based upon an analysis of what the sewer system could accommodate. The NPS did not want to increase the capacity of the infrastructure that supports the resort or dramatically change the footprint of the operation on land.

"We applaud the approach proposed to identify clearly defined Climbing Management Areas within the NRA. The transparency and clear communication of the process and the proposed dialogue with stakeholders and the general public are forward thinking and provide a good example of recreation planning proposed right."

Cynthia Wilkerson, The Wilderness Society

As previously stated in the GMP, the Resort would also be permitted to run two water taxis on Ross Lake. This increased service would enhance opportunities for visitors to efficiently move around Ross Lake, accessing campsites and trailheads, while still maintaining the quality of the experience on Ross Lake. The second water taxi, run by Ross Lake Resort, would enhance the services provided by the Resort as opposed to conflict with the services presently offered.

Hunting

Hunting Concern 1: The assumptions for hunting in the analysis of impacts are inconsistent with respect to visitation numbers.

Representative Comment:

"In Volume II, on page 103, we find the statement: 'It is assumed that demand for hunting within Ross Lake NRA would remain relatively constant under the No Action Alternative'. At many other points in the draft GMP/EIS (e.g. page 105) the assumption is stated that park visitation will increase in proportion to population growth in western Washington and British Columbia. Why would this assumption of visitation increase not also pertain to hunter numbers under all the plan's alternatives? Greater population could well mean more hunters as well as more hunting areas lost to development or other factors and, hence, more hunting pressure in Ross Lake NRA."

Response:

There does not appear to be a positive correlation between population growth and hunting. National and regional surveys of hunters (and anglers) actually indicate ongoing or consistent slight declines in the number of people hunting (and fishing) over the past two decades, in spite of population growth. Informed by these statistics, the NPS assumed hunting would remain constant (as opposed to declining) because that assumption would provide a more conservative assessment of potential adverse effects.

Reference: U.S. Department of the Interior, Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. 2006 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.

Hunting Concern 2: Consider expanding the proposal for no lead in hunter's ammunition to anglers.

Representative Comment:

“Why does the RLNRA Management call for no lead in hunter's ammunition but not the same for anglers? [The American Fisheries Society new policy white paper calls for banning of lead shot, etc. in fishing].”

Response:

The NPS agrees; and it is stated in preferred alternative in the Alternatives Comparison Table of the draft GMP/EIS and in the final GMP/EIS that the NPS would “work with WA State Fish and Wildlife to prohibit use of lead tackle in Ross Lake NRA.” This guidance has also been added to the description of the preferred alternative in the final GMP/EIS.

Hunting Concern 3: Consider a hunting ban in the GMP.

Representative Comment:

“The proposals to expand safety zones around trails and provide education on the presence of hunters are wholly inadequate for protecting RLNRA visitors from hunting accidents. Given the desired and expected increase in family-friendly recreation in the RLNRA, hunting should be banned in all areas of the RLNRA.”

Response:

While the NPS understands concerns about hunting and visitor safety, the NPS did not consider a hunting ban in the GMP. According to the legislative history, Ross Lake National Recreation Area was designated as a National Recreation Area, as opposed to a National Park, for two key reasons: (1) to accommodate hydroelectric development including future raising of Ross Lake; and (2) to provide for more diversified and intensive recreational use, such as hunting, than is normally the custom within a national park. Congress recognized that hunting would have the potential to adversely affect visitor safety and conflict with the conservation mandate of the mission of the NPS. To mitigate these risks, Section 402(d) of the Enabling Legislation provides the NPS the authority to curtail, but not prohibit, hunting in certain areas for a wide variety of purposes. Additional legislation would be required to prohibit hunting in Ross Lake NRA. The NPS does not believe such legislation is warranted because (a) Congress intended for hunting

to continue by designating the unit an NRA; (b) statistics indicate very few people currently hunt in the NRA; (c) very limited numbers of wildlife are taken each year; and (d) to the best of the agency's knowledge, there have been very few accidents or incidents related to hunting that could justify such a ban since the NRA was established. The NPS has also proposed to expand safety zones in the vicinity of trails and developed areas such as visitor centers, campgrounds, and the ELC to maximize visitor safety. Should circumstances change and hunting becomes a more prominent activity, the NPS has the authority to impose further restrictions on hunting and still achieve the conservation mission.

Hunting Concern 4: Commenters question the information in the GMP related to fishing and hunting and the NPS's role in and goals for managing these activities.

Representative Comment:

“The statement that ‘The Washington State Department of Fish and Wildlife would continue to regulate fishing (or hunting) in Ross Lake NRA’ (p. 95) implies that the NPS does not have any role in fish management. This is contrary to what we understand to be the case at present. NPS has a significant role to ensure non-impairment of resources. The NPS played a very active role in defining fish mitigation arrangements in the Skagit Project Relicensing...What is the NPS goal of fish management of fisheries? What about management of hunting where mountain goat numbers have plummeted in the North Cascades?”

Response:

The commenter raises two interrelated but separate concerns about fishing (and hunting): the regulation of this recreational activity and the management of the resources. While the NPS actively surveys and manages the fish populations in Ross Lake NRA (including pursuing mitigation activities with SCL), the NPS believes the regulations established by the Washington Department of Fish and Wildlife (WDFW) are currently effective at regulating fishing activities within Ross Lake NRA. The enabling legislation for Ross Lake NRA provides for hunting and fishing to occur under the applicable laws of the United States and of Washington State, but also provides the NPS the authority to override state regulations for a wide spectrum of reasons including public safety and conservation of fish and wildlife resources. The NPS and WDFW do work in cooperation for fishing regulations. For example, the 2010 WDFW regulation change on Ross Lake aimed at helping protect native Bull Trout (listed as a threatened

species under the Endangered Species Act) was done at the request of the NPS. The goal of the NPS regarding conservation of fish and wildlife resources is to actively support native species in their native habitats. Since the fishing regulations established by the Washington State Department of Fish and Wildlife reasonably support this goal, the NPS does not believe an override of these rules is reasonable at this time.

Seaplanes

Seaplane Concern 1: The need for additional management, regulation, or restriction of seaplane access and use is questioned.

Representative Comments:

“Seaplane use of the park has never been excessive and there is no data to suggest that will change.”

“Seaplane rated pilots are decreasing in number and Ross Lake remains a relatively remote location.” “It has been estimated that there are probably less than a dozen seaplanes in a season.” “A permit system limiting seaplane access for the estimated 12 flights per year would be costly and unnecessary.”

“The proposal does not provide adequate and secure/safe campsites to seaplane visitors.” “Only north facing campsites provide sufficient protection from the southerly swell.” “There are only a limited number of campsites (north facing with a dock) which are well suited for float planes.” “Safety is always paramount in operation of boats and/or seaplanes. Limiting access to the ends of the lake would compromise safety. The center of the lake is always the safest location on which to land and take off.”

“Seaplane pilots must be licensed by the federal government and are required to complete recurrent training. . . The pilot community is also very effective at policing themselves. This is one reason few problems occur with those in the seaplane community. The Federal Aviation Agency, under whose regulations seaplanes operate, advises seaplane pilots to operate in a safe and friendly manner in/over wilderness areas.”

“It is unfair and unjustified to limit seaplane access.”

“The draft plan would allow motorboats to continue to operate in both the frontcountry and backcountry management zones; seaplanes should be treated no differently.”

“Seaplanes provide access to the elderly and handicapped who cannot readily access Ross Lake.”



Falls on Ross Lake.

Response:

In the final GMP/EIS, restricting seaplane landings and take-offs to the Frontcountry Zone has been removed from the preferred alternative. 36 CFR 7.69 would not be changed. 36 CFR 7.69 states “the operation of aircraft is allowed on the entire water surface of Diablo Lake and Ross Lake, except that operating an aircraft under power on water surface areas within 1,000 feet of Diablo Dam or Ross Dam or on those posted as closed for fish spawning is prohibited.”

It is recognized that seaplane use in Ross Lake NRA occurs infrequently due primarily to limiting factors that will not change, such as weather, the steep terrain and physical geography of Ross and Diablo Lakes, reservoir levels, border security, Federal Aviation Administration regulations and licensing of pilots and planes, and costs. Additionally, existing data shows that seaplane ownership and use in Washington has not increased in the last two decades and is not anticipated to increase in the near or long term future.

The NPS also believes safety is vital for all recreational activities in Ross Lake NRA, including seaplane use. Strong winds from the south and limited available water surface make landings and take-offs aeronautically challenging on Ross Lake. North facing docks are best suited for seaplanes because they provide shelter from the southerly swells. The number of docks that meet this criteria are limited and will not increase in the future. Together with dock requirements, these limiting factors narrow the options for safe access and use on Ross Lake to a handful of lakefront campsites that are located sporadically along the full length of Ross Lake.



Public meeting in Bellingham, 2010.

The intent of the preferred alternative is to largely maintain the visitor experience on Ross Lake as it currently exists, including use levels, forms of access, and range of recreational activities. Seaplane use is recognized as a mode of transportation, similar to other motor vehicles, to access Ross and Diablo Lakes and campsites along the reservoirs. The change in the preferred alternative would continue to maintain this form of access for seaplanes. The plan also proposes to maintain existing facilities and infrastructure in kind. Day and overnight use could continue for seaplanes at 9 of the 19 campsites on Ross Lake that are suitable for seaplane docking. Seaplane users who overnight at lakefront campsites would continue to need a backcountry permit similar to all users of these sites.

The cumulative effect of all these factors, including long-term seaplane use trends, increasing costs, increasing regulatory requirements of pilots (including border security), limited weather windows (which may become smaller with climate change and will also contribute to more debris on the lake), limited infrastructure such as docks, will all combine to limit seaplane use of Ross Lake.

Seaplane Concern 2: Commenters question the impact analysis related to seaplane use.

Representative Comments:

“The infrequent seaplane operations at Ross Lake cause no adverse effect to the environment, neither to nature nor to people.”

“The argument that seaplane noise is a detriment to the wilderness environment is invalid.”

“No data was presented to show prior complaints.”

“Any rational and fair estimate of the long-term beneficial cumulative impacts on visitors in the broader North Cascades by restricting seaplane access would realistically, applying your own criteria and methods, fall somewhere between slightly above negligible to minor and fleeting. Even the harshest reasonable assessment, informed by the facts, would be a long way from ‘moderate’. The findings in this report regarding seaplane access are unrealistic, unfair, misleading and cannot be borne by the facts.”

“Seaplanes pollute less than any motor boats. Engine exhaust does not enter the water.”

Response:

New information about levels of seaplane use and noise has also provided a clear rationale for changing

the preferred alternative and updating the impact analyses and impact intensity determinations in the final GMP/EIS. The impact analysis and impact intensity determinations for natural soundscapes, wilderness character, visitor opportunities, access and transportation, and socio-economics have been updated in relation to seaplane use in the Environmental Consequences chapter. The preferred alternative has been changed to state that seaplanes are allowed to land and take off in Ross Lake NRA compliant with CFR 36 7.69. A new proposal for noise abatement procedures for seaplanes has been added to the preferred alternative.

Seaplane Concern 3: Commenters provide a new idea for the preferred alternative to include noise abatement procedures to address concerns related to noise and soundscape on Ross Lake.

Representative Comments:

“Any concerns about noise or excessive use could be readily addressed through the implementation of a standard noise abatement policy and guidelines for seaplane access” to address concerns related to noise and soundscapes on Ross Lake.

“Seaplanes make less noise than outboard engines in aggregate. It has been estimated that there are probably less than a dozen seaplanes in a season. Seaplanes only make sizable noise when taking off which only lasts 30 to 60 seconds. The total time of noise (in excess of an outboard motor) is no greater than 10 to 12 minutes a year.”

“Few, if any, noise complaints have been raised by visitors or anyone else.”

Response:

The preferred alternative has been changed to include noise abatement procedures for seaplane use in Ross Lake NRA and to develop and maintain a long term acoustic monitoring program to better understand soundscape impacts, particularly on wildlife. The NPS would work collaboratively with the seaplane pilots community to create noise abatement procedures (such as reducing propeller speed as much as possible for take-off, reducing it further once off the water; maintaining distance from campsites and vessels on the lake; making every effort to fly no less than 2,000 feet above ground level (AGL); avoiding prolonged flight at low altitudes; and others, recognizing that safety is the first priority) and educate pilots about these procedures and general seaplane use in Ross Lake NRA. Noise abatement procedures would be instituted through the superintendent’s compendium

or through voluntary compliance. These noise abatement procedures would seek to minimize noise during take-off and while flying in or near Ross Lake NRA. These changes have been updated in the final GMP/EIS.

Soundscapes

Concern: Additional suggestions for alternatives related to managing soundscapes and noise impacts in the NRA are provided.

Representative Comments:

“Develop an agreement with Washington DOT that would restrict motorcycle access on Highway 20 to a daytime period like 7AM to 8 or 9 PM so they also wouldn’t pollute the natural soundscape during campfire and sleeping times.”

“[E]ither unilaterally or via an agreement with DOT, have rules that forbid leaving motorcycles and other noisy vehicles from idling their engines at overlooks and in parking areas at Visitor Centers and Campgrounds.”

“Prevent motorcycles from driving up the roads to the Newhalem and Marblemount Visitor Centers, with parking areas on Highway 20 and shuttle buses from there to the Visitor Centers...many other National Parks have major free shuttle systems [Glacier, Rainier, Olympic, and Yosemite, all places where my family has ridden them], so there must be some way to reduce expenses.”

Response:

The Washington Department of Transportation manages the North Cascades Highway. To the best of the NPS’s knowledge, no 2-lane paved state highway is managed to exclude certain types of passenger vehicles commonly found on those highways. NPS campgrounds themselves have quiet hours established (generally 10 pm – 6 am) which should preclude loud noises from any vehicles within the campground that are mentioned in the comment, but the NPS has no authority to prohibit these types of vehicles on the North Cascades Highway. As noted in the description of the preferred alternative, the NPS will look for ways to enforce existing noise standards and increase education efforts about noise impacts and the values of natural sounds along the North Cascades Highway.

Also, as articulated in the GMP, the National Park Service will increase its visitor education efforts related to natural sounds and the impact of noise to wildlife and the visitor experience in these locations. Other

reasons to decrease engine idling throughout the park will also be emphasized, notably to decrease carbon emissions into the atmosphere.

Finally, the road to the Marblemount Wilderness Information Center is owned by Skagit County, not the National Park Service. At this time, a shuttle bus system to serve the one-mile of road from the North Cascades Highway to the Newhalem Visitor Center is not fiscally viable. The free shuttle bus system at Glacier National Park is funded by visitor entrance fees (Ross Lake NRA has no entrance fees) and serves most of the roadways in that park, rather than just one short segment to a lone destination (such as the Newhalem Visitor Center). In the summer of 2011, Glacier National Park and the Washington office of the NPS are doing a business plan on that shuttle system to determine if it can be financially sustainable. Again, at this point the NPS believes that visitor education is the initial starting point to try to reduce noise impacts from motorcycles.

Other Park Uses or Activities

Concern: Policies for mushroom harvesting are questioned.

Representative Comment:

“My primary concern is that none of the alternatives address the issue of foraging, specifically collecting wild mushrooms. . . The present policy, which prohibits the ‘gathering, collecting, or harvesting of all mushrooms,’ . . . is based on a lack of information. Fortunately, two studies published in 2006 provide information directly relevant to this policy. Both studies show that responsible harvesting does not damage this resource.”

Response:

The NPS remains concerned about impacts from mushroom harvesting, including effects on mushroom populations as well as associated impacts on other resources from harvesting. Very few surveys have been conducted to document the species of mushrooms within Ross Lake NRA or North Cascades National Park Service Complex. The NPS currently has very little information on the number and distribution of fungus species or the range of these species within the North Cascades NPS Complex. The NPS is also concerned about impacts from harvesting activities on additional resources including trampling of other sensitive natural and cultural resources that may be in proximity to mushroom populations, trail impacts, take or harvest of other materials (inadvertent or otherwise), enforcement capacity, conflicts with

other users, etc. As a result of a lack of local or site-specific knowledge about mushroom populations in the North Cascades NPS Complex and in Ross Lake NRA specifically, and concerns about effects not only on mushroom populations but all resources affected by harvest activities, the NPS maintains its current restriction in order to preserve the ecological integrity of the forest systems in Ross Lake NRA.

Facilities

Campgrounds

Concern: The aggregate ponds are not a viable location for potential future campground development.

Representative Comments:

“Development of a campground near the aggregate ponds is likely to be inconsistent with managing this area as salmon habitat, which is required in the Settlement Agreement for the Skagit License. However, City Light is willing to work with the NPS to identify locations for a new campground that may exist on other City Light-owned property.”

“At one point in Volume I of the plan, the possibility is raised of a replacement campground development near the Ag Ponds west of Newhalem. This is an area well-known to birders for its avian diversity and nesting species [that are] rare west of the Cascades; for example, American Redstart, Veery, and others.”

Response:

Based on consultation during the review of the draft GMP/EIS, the NPS recognizes that potential future development of a campground at the aggregate ponds is inconsistent with Seattle City Light’s management of the area as salmon habitat. As a result, the NPS has removed the aggregate ponds as a potential future camping location, and the final GMP/EIS has been updated to reflect this decision. Instead, the NPS has substituted a broader statement reflecting that Seattle City Light is willing to work with the NPS to identify locations for a new campground that may exist on other Seattle City Light property.

Hozomeen

Concern: The NPS should include a plan for Hozomeen should the road from Hope be paved.

Representative Comment:

“Paving the road to Hozomeen will greatly change Ross Lake. Encourage Canada to not pave road, but it

will happen in the next 20 years. NPS needs a plan to respond to this change.”

Response:

Throughout the planning process, the NPS has consulted with the B.C. government and the NPS understands from this consultation that there is no priority to pave the road from Hope to Hozomeen. The NPS has also heard from B.C. Transportation that there are no plans to pave the road. The NPS has stated its position in the GMP (Volume I, page 91). The NPS would encourage Canadian officials to maintain the existing gravel road in order to preserve the relatively low-intensive and tranquil experience on Ross Lake NRA, recognizing that paving this road could fundamentally alter the character of Hozomeen and Ross Lake NRA. Given the information the NPS has received from B.C. government bureaus, and the position of the NPS as articulated in the GMP, the NPS does not see the threat to pave the road from Hope to Hozomeen as a threat that requires an articulated or more detailed plan.

Skagit River Bridge in Newhalem

Concern: Commenters question the rationale for replacing the Skagit River Bridge in Newhalem.

Representative Comments:

“N3C is strongly opposed to investing \$6,100,000 in construction of a new two-lane bridge to reach the existing visitor center behind the Newhalem campground. These funds could much better be spent creating a new visitor center in Marblemount.”

“Why is the bridge over the Skagit leading to the Newhalem Visitor Center going to be replaced? If the bridge is structurally sound, I don’t understand why several million dollars would be spent replacing it. The inconvenience of a one-way bridge is very minimal. I’m sure the Park can use this money in many better ways.”

Response:

Replacement of the bridge across the Skagit River at Newhalem has been removed from the preferred alternative. The Federal Highway Administration conducted a condition assessment of the bridge and determined that it is structurally sound and that its lifespan is projected to be beyond the time frame of this GMP. In the future, there will continue to be a need for a bridge across the Skagit River in Newhalem to access the Newhalem Creek Campground, trails, natural features, and Seattle City Light hydropower operations. Based on the Federal

Highway Administration finding and the high cost of bridge replacement, the NPS proposes to maintain the existing bridge until such a time when the bridge needs replacement. Better pedestrian and bicycle access and a two lane option would be considered in the design for a replacement bridge. The costs associated with bridge replacement have also been removed from the preferred alternative.

Trails

Concern: Suggestions for new trails to consider were provided.

Representative Comments:

“I am writing to introduce the concept of building a “Skagit River Trail” within the recreation area.”

“I urge you to develop a Ruby Mountain trail so that the NRA truly serves a larger portion of its visitors and fulfils the founding vision of the North Cascades National Park Complex.”

“The park needs more low elevation, three season trails. Create additional trails to views/points to experience world class scenery...”

“Create a loop trail around Diablo (from overlook to colonial campground). It would be a low elevation trail, somewhat easy, with great views. It also shouldn’t impact grizzly core habitat.”

“The viewpoint trail to Little Jackass should be considered again because it would be a premier day hike, and we are lacking mid-elevation trails to great views in the park complex.”

“Make Thunder Knob a loop trail.”

Response:

The NPS reviewed several trail proposals presented in the public comments. In response, a new statement has been added to the preferred alternative about the consideration for a modest expansion of trails to scenic vistas along the North Cascades Highway

“We agree with Alternative B’s approach of trying to replace storm damaged facilities at non-hazard areas nearby but not rebuilding them within the hazard zones.”

Public Comment

“We have been coming to ROLA since 1973 for a quiet, wilderness experience. Keep it as it is.”

*Public Comment from
Newhalem Public Meeting*

as opposed to a long-range programmatic plan, the final GMP/EIS has been updated to include a broad statement about ongoing coordination between WSDOT and the NPS for actions on State Route 20, the North Cascades Highway.

Transportation Concern 2: Comments express a desire for additional road access to Ross Lake.

corridor in addition to the specific trails listed in the preferred alternative. These additional trails could be considered during the lifetime of this GMP.

Transportation Facilities

Transportation Concern 1: Commenters provide additional information about improvements or the management of facilities along the North Cascades Highway.

Representative Comment:

“The preferred alternative recommends several improvements including signage, parking, and pullouts. WSDOT’s funding is extremely limited; however, we often help other agencies that have their own funding to complete projects on or near the state highways, and we would be happy to assist you as you implement these plan recommendations. Anything constructed along SR 20 would require close coordination between WSDOT and National Parks, consistent with the Highway Easement Deed. The following are a few considerations: - Improvements should be consistent with WSDOT’s Design Manual and access management practices. - The addition of permanent signage on the highway requires approval from our traffic engineer and would be installed by our maintenance crews. - Design standards guide the placement of turn lanes based on traffic operations and roadway geometry. Changes to roadway channelization, such as the proposal to add a turning lane at the Ross Dam Trailhead Parking Lot, must be evaluated by our traffic engineer. - A traffic control plan for the time of construction would be needed to avoid potential traffic hazards.”

Response:

The NPS recognizes improvements proposed along the North Cascades Highway such as signage, parking, and pullouts would need to be coordinated with WSDOT and implementation of many actions will require consultation with a WSDOT staff, as well as WSDOT policies and procedures. While some specific actions, such as using WSDOT maintenance crews to install signs or instituting a traffic control plan during construction of the Ross Dam Trailhead Parking Lot, will be addressed during project implementation

Representative Comment:

“City Light encourages the NPS to consider the possibility of a road approximately 1 mile in length between Washington State Route 20 and Ross Dam itself.”

Response:

The NPS and Seattle City Light have historically worked closely together to repair and/or replace facilities that are damaged by natural events, such as rockfall, and reestablish the required access cut off by these events. The dam and powerhouse were constructed and have been maintained with the access that presently exists. Establishing a new road would not prevent future rockfalls or natural events that may cause temporary disruptions to regular access. Further, establishing additional road access to Ross Lake would result in extreme pressure to open Ross Lake up to more intensive recreation and would fundamentally alter the character of the experience on Ross Lake. This type of intensive recreation is inconsistent with the legislative intent of creating Ross Lake NRA, which clearly envisioned a hydroelectric facility but also a remote and wild experience on the reservoir itself. The public has also expressed strong desire to maintain the character of the experience on Ross Lake as it is today; therefore, the potential impacts and pressures associated with extending additional road access to Ross Lake is not warranted and the NPS is not including this idea in the final GMP/EIS.

Visitor Orientation Center

Concern: Comments express a desire for a visitor orientation center in the town of Marblemount.

Representative Comments:

“[T]he Newhalem Visitor Center should be phased out and the site restored. The more visible and accessible visitor center in Marblemount would be used by far more visitors and would provide far more opportunity for educating North Cascades visitors on the recreation amenities and conservation values of the North Cascades. Placement of the visitor center in Marblemount would also create the potential for public-private partnerships that could substantially

improve the economies of Marblemount and other gateway communities in the Skagit Valley.”

“The gateway communities need to serve as ‘visitor orientation centers’ for Park visitors. . . [T]his location is uniquely suited to a visitor orientation center. There is literally no other site so well prepared in the Marblemount/Rockport area. . . Instead of building a \$6,100,000 bridge, that money should be allocated to the gateway community ‘visitor orientation centers’ to build year-round Park traffic that could really justify a new bridge.”

Response:

While the NPS recognizes the desire for a greater sense of arrival and orientation to the park in Marblemount, constructing or locating an additional visitor orientation center is not financially feasible during the life of this GMP. Such a center would place additional strain on building operations, maintenance, and staffing, and it is extremely unlikely that the NPS would receive the funding needed to support these additional costs within the next twenty years. There are also concerns about overdeveloping the park and confusing visitors with too many facilities spread along the west side of the North Cascades Highway. However, if circumstances presented themselves at some time in the future where the North Cascades Visitor Center in Newhalem was no longer functional, the NPS should rethink its visitor facilities and consider consolidating visitor information and orientation services in Marblemount.

Wilderness Information Center

Concern: Commenters suggest updating the Wilderness Information Center or incorporating Alternative D’s proposal to move the public function of the Center out to the highway in Marblemount.

Representative Comments:

“We support moving the Marblemount Ranger Station, or at least a Visitor Contact station to the highway. In the long term, ease of visitor access to the superb information provided by the Wilderness Information Center will continue the trend of educated and informed visitors to the wilderness. Having a Park presence on Highway 20 would make the Park presence more visible and improve access for bicyclists as well.”

“It is essential to get the Wilderness Information Center onto Hwy 20. It will be more convenient which will improve compliance, protect resources better, and reduce infractions based on ignorance.”

“Extend climate friendly parks initiative to clarify for visitors how they can do their part so it isn’t so park-centric. What can visitors do? If every visitor who visited the park could learn how to be a better steward of their public lands, it would be great.”

*Public Comment from
Sedro-Woolley Public Meeting*

Response:

The NPS agrees with the commenters’ desire to provide an easily accessible, engaging, and high-quality visitor contact station in Marblemount.

However, as articulated in the final GMP/EIS, maintaining the location of the current Wilderness Information Center is administratively reasonable and fiscally responsible.

The NPS has recently upgraded significant portions of the Wilderness Information Center. As part of the final GMP (page 91 and 166 in the draft plan), the NPS would continue to address commenters’ concerns about an office that is relevant and welcoming to modern wilderness visitors. Upgrades will include continued landscape re-design to improve visitor orientation, a re-designed entryway, and updated exhibits, as funding becomes available.

Similarly, moving the public functions of the permit center would also have some effect on service levels, since it would separate the staff from the base of emergency operations. Many staff perform multiple functions (such as both visitor service and emergency response) in the program and therefore having all the functions together is the most efficient organization.

Finally, as the draft GMP/EIS currently states, “this alternative would not preclude moving public functions of the wilderness center to another location if found suitable and feasible in the future” (page 91). Therefore, if circumstances presented themselves such that the Visitor Center in Newhalem were no longer functional, the NPS could consider locating a visitor center or combined visitor and wilderness permit center and consolidated services in the town of Marblemount. However, it is unrealistic to expect that within the twenty-year life of this plan the NPS would be able to obtain funding to construct, maintain, and staff another facility.

Sustainability

Concern: Comments request additional information be included in the final GMP/EIS.

Representative Comment:

“[W]e believe that a summary of the practices and federal requirements related to green building and conservation such as the list below is appropriate to include in the EIS (e.g. in Table 2.1). We recommend that they be considered in developing the final EIS and during development of new facilities.”

Response:

The NPS has updated the final GMP/EIS to include a new section on Climate Change and Sustainability in the Desired Conditions Based on Law and Policy in the final GMP/EIS. The information provided has been included in this section in the final GMP/EIS.

Resource Management

Air Quality

Concern: Commenters question the analysis of air quality in the impact analysis.

Representative Comments:

“We note that in Volume II, “Impacts from Alternative B: Air Quality,” on page 122, the effects of a change to Class I are not described.”

“Burning debris at the north end of Ross Lake is negatively impacting the visual characteristic of the area. Does this impact the potential change from Class II to Class I air designation?”

Response:

The final GMP/EIS has been revised to include the missing portion of the impact analysis. In summary, this redesignation would require legislation, and if passed, would have limited practical effect given the intermingled geography of the North Cascades National Park and Ross Lake NRA. The airsheds are essentially comingled, so the Prevention of Significant Deterioration (PSD) provisions in the Clean Air Act, which afford the highest protection to the Class I airshed of North Cascades, would inadvertently afford a similar level of protection to Ross Lake NRA regardless of whether it remains as a Class II airshed or is converted to a Class I airshed. Therefore there would be a negligible beneficial impact to air quality and air quality related values such as visibility.

This “negligible impact” also relates to the commenter’s concern about burning debris at the northern end of Ross Lake. The proposal to change from Class II to Class I would have no effect on Seattle City Light’s longstanding practice of burning woody debris because that action is not governed by the Prevention of Significant Deterioration regulatory provisions of the Clean Air Act as amended in 1990.

Cultural Resources

Concern: New information about the significance of cultural resources is provided.

Representative Comment:

“City Light understands the importance of maintaining historic structures in Diablo and Newhalem and is actively working to revitalize many of these facilities. At the same time, . . . some housing and other buildings will be removed. City Light has also recently completed an update National Historic Register nomination for the Skagit River and Newhalem Creek Hydroelectric Projects. There are now over 70 buildings, structures, and objects that are eligible for listing on the National Register. The final GMP should reflect the results of this assessment.”

Response:

This information has been added to the final GMP/EIS.

Grizzly Bear Management

Concern: Commenters request clarification of the rationale for 70% maintenance of BMUs and suggest consulting with additional technical teams in developing a standard for maintaining core area for grizzly bears.

Representative Comments:

“NOCA needs to clarify if 70% maintenance BMU core area is an average of all BMUs, or per each BMU. A high number would be preferred for the area as a whole.”

“Bear habitat is now at 82-90%. Why allow lowering this to 70%? Why degrade core area (or allow it) if it is not necessary? Yellowstone habitat is different than the NOCA habitat - 70% Core Area values is enough for Yellowstone, but it does not automatically translate to those values are sufficient for NOCA. . . . So, ‘when drawing comparisons to Yellowstone’ NOCA needs to understand the differences between the two places before we blindly accept 70% as a sufficient level for NOCA.”

“BC Technical Team should review these proposed core values and NPS should solicit their input. This could help encourage consistency across the landscape/other agencies such as the Okanagan.”

“Don’t manage any BMU to 70% minimum, particularly without adequate data that shows how grizzlies might use the area, and in so doing preclude any options for management flexibility in that BMU. 70% Core Area should be a value to exceed, not manage to.”

Response:

The NPS recognizes the value of maintaining grizzly bear core habitat and understands the delicate balance between resource protection and development. In response to the commenters’ concerns about bear management units, the NPS consulted with the North Cascades Ecosystem Grizzly Bear Technical Team, which consists of biologists from the US Fish and Wildlife Service, US Forest Service, Washington Department of Fish and Wildlife, Washington Department of Natural Resources, the British Columbia Ministry of Environment – Ecosystems Branch, and the National Park Service, on what would constitute proper management of the BMUs found within NPS boundaries, based on the best available science.

The NPS has incorporated the Team’s recommendations into the final GMP/EIS:

- Current science supports a core area standard of $\geq 70\%$ per BMU. This value is not a goal, but rather a minimum standard that is known to support recovering grizzly bear populations.
- The NPS will maintain a core standard at higher levels than this 70% value, particularly given that current core area values for all but four of the 11 BMUs within NPS boundaries range from 79-92%.
- A habitat assessment will be completed for any proposed development that might affect a BMU within Ross Lake NRA, North Cascades National Park and Lake Chelan NRA. This will provide an analysis of impacts to grizzly bear habitat in addition to any changes to the percentage of core habitat. The NPS will strive to minimize, avoid, or mitigate impacts on high quality spring and fall grizzly bear habitat.
- A habitat assessment and consultation with the North Cascades Ecosystem Grizzly Bear Technical Team has been completed for proposed trails that are included in the

“We strongly support a careful, science-based approach to siting any new development, including trails, in Ross Lake NRA in the interests of resource protection and restoration and fulfillment of the NPS mission.”

Public Comment

Ross Lake GMP/EIS. These trails would generate only a 0.3% loss of core area, which is considered to be a negligible loss of core area.

- Three BMUs shared with the Mt. Baker-Snoqualmie National Forest (two within the north unit of the national park, one within the south unit) do not achieve 70% core area because of road and high-use trail densities primarily on national forest and private lands. One shared BMU achieves 71% core area, with most development occurring on national forest and private lands. The NPS will consult with the USFS in any circumstance where the development of potentially high use trails within the national park would affect a shared BMU that is currently below the 70% core area ratio, or which could reduce the core area ratio below 70% overall for a shared BMU.
- Any new proposals for development (trails included) will be evaluated for potential impact on core area and habitat quality.

Wilderness

Concern: Commenters question the rationale and analysis for the statement regarding no net increase of trails in wilderness and provide suggestions for new trails to consider in the Preferred Alternative.

Representative Comments:

“We are perplexed about the statement that there will be no net increase of trails in wilderness... the purpose and need of this policy is unclear... We suggest that the approach of a resource capacity combined with a social needs assessment be combined to explore whether there exists demand for more trails in wilderness and, if so, whether the natural resources have the capacity to offer any additional opportunities.”

“Today, Ross Lake NRA offers very little for the casual visitor who enters and exits the Area via SR-20... for the day user the only attractive trails are Thornton Lake and Sourdough Mountain. Given the

characteristics of these two trails, which have been in existence since before the park creation in 1968, the GMP is providing very little for the vast majority of visitors to the Ross Lake NRA. This situation could be improved dramatically, if the plan included a world class trail up Ruby Mountain from the Diablo Lake Overlook.”

“The park needs more low elevation, 3 season trails. Create additional trails to views/points to experience world class scenery...”

Response:

The statement of “no net increase in miles of trails in wilderness” has been removed and the final GMP/EIS has been updated to clarify proposals for new trails in addition to criteria for considering new trails in designated wilderness. Trail development in the Wilderness Zone will be very minimal and primarily accessed along the North Cascades Highway corridor. In large swaths of trail-less wilderness of Ross Lake NRA or North Cascades National Park the NPS would strive to preserve opportunities for solitude and the untrammeled and undeveloped character of the wilderness when considering new trails. Any trail actions in designated wilderness must meet the minimum requirement analysis.

Many of the suggestions for new trails may be considered, but no specific trails will be built before assessing visitor demand, considering the resource impacts, analyzing feasibility, and obtaining funding. To provide clarification about areas and zones where new trails will and will not be considered, the language of the final GMP/EIS has been modified. Emphasis will first be placed on improving existing trails and trailheads to make them more welcoming, such as the Sourdough and Stetattle Creek Trailheads. Development of trails will focus primarily in the Frontcountry, Backcountry, and Skagit River zones.

Foundation Statement

Concern: Reference to seaplanes should be added to the Foundation Statement.

Representative Comment:

“I believe this document is missing references to seaplanes as a historical artifact at Ross Lake. They have been a key mode of transportation since the inception of Ross Lake... Ross Lake has a tradition and history of seaplane access in keeping with Northwest history and the history of the lake. Not only has Ross Lake been accessible throughout its life to

seaplanes, the founder of Ross Lake Resort frequently accessed the resort via floatplane. Also, ‘seaplanes’ should be added to ‘camping, boating and fishing’ in paragraph 10.3.”

Response:

The foundation statement documents a shared understanding of Ross Lake NRA’s purpose, significance, and fundamental resources and values that provide basic guidance for decision-making and management of the unit. While seaplane use on Ross Lake has occurred for decades, it occurs infrequently and is not a common recreational activity shared by the general public. The NPS has received public comments during the planning process that display a range of opinions about seaplane activity on Ross Lake, ranging from supporting a ban on seaplanes within Ross Lake NRA to supporting unlimited seaplane use. In light of these differences of opinion about seaplane use and limited seaplane activity, the NPS has determined that while seaplane use is an historic and appropriate recreational activity, it is not a fundamental resource and value for Ross Lake NRA.

Planning Process

Concern: Commenters question the public involvement process and opportunities to comment during the planning process.

Representative Comment:

“I am always somewhat offended when I am asked to respond to a Plan that has already been developed, as opposed to having input early on in the development of a Plan. ‘Articulating a vision and overall management philosophy’ is only really possible when one has early input, not after four like-minded scenarios have already been solidified, none of which shows awareness of the realities that face our North Cascades region... I do not believe that responding to a pre-conceived Plan has any chance of impacting that Plan, or altering the outcome of this ‘planning event’. There is a reason why you keep people out of the real planning process, and only due to requirements by law do you ‘allow’ for this comment period. You are not responsible to the people of this area, and you know it.”

Response:

The NPS invited the public to contribute their concerns, ideas, and opinions during three important stages in the GMP planning process: scoping (September-December 2006), draft alternatives (February-March 2008), and draft GMP/EIS (July-

September 2010). The NPS also invited public involvement on the Skagit Wild and Scenic River Studies (October 2008). The NPS went far beyond the requirements for engaging the public that are required by law, including holding nearly 20 public meetings in Ross Lake NRA, gateway communities, Seattle, and British Columbia. Presenting the draft alternatives to the public and inviting public comment was an additional step that the NPS conducted to gather input to assist in refinement of the alternatives and selection of the preferred alternative. Furthermore, the NPS held the public comment period on the draft GMP during the peak visitation season to attract a wide range of visitor comments. Public comments were received in meetings, letters, postage paid comment forms, and electronically via e-mail and the project website. Many of the concepts and actions in the final plan came directly from individuals who participated in the planning process. Public involvement has been an essential component to the development of this GMP for Ross Lake NRA and has influenced all aspects of the final GMP/EIS.

COMMENT LETTERS

The following section shows reproductions of the comment letters from federal, state, and local governments; businesses; and interest groups and organizations that provided comments on the draft plan. Due to the extensive number of comment letters, comment letters from private citizens are not included in this final volume.

Copies of all letters are available in electronic format, with individual names and addresses removed, and are available upon request. The responses to these letters are shown in the previous section.



Public meeting in Bellingham, 2010.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

September 7, 2010

Palmer Jenkins
Superintendent
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, Washington 98284

Re: EPA comments on draft Environmental Impact Statement (DEIS) for the Ross Lake National Recreation Area (NRA) General Management Plan. EPA Project Number 06-066-NPS

Dear Mr. Jenkins:

The U.S. Environmental Protection Agency (EPA) has reviewed the DEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The DEIS analyzes the no Action Alternative, Alternative A, and three action alternatives (Alternatives B, C and D) for future management of the Ross Lake NRA during the next 15 to 20 years. The DEIS presents strategies for resource protection, education and interpretation, visitor use and facilities, land protection and boundaries, and long-term operations and management of Ross Lake NRA. The alternatives vary by degree of management to support visitor use, desired future conditions, and application of the following management zones: Frontcountry, Backcountry, Wilderness, Skagit River, and Hydroelectric. The Frontcountry exists along the North Cascades Highway and developed areas and supports the highest degree of visitor access while the Backcountry and Wilderness zones focus on limited facilities and provide a sense of remoteness and natural conditions. The Skagit River Zone focuses on visitor facilities associated with river recreation and the Hydroelectric Zone includes areas where Seattle City Light operations exist and are linked to Frontcountry recreation activities. Alternative B contains a balance between Frontcountry and Backcountry management zones, Alternative C contains the most backcountry designation, and Alternative D contains the most Frontcountry designation. The DEIS identifies Alternative B as the Preferred Alternative and the Environmentally Preferred Alternative.

The document clearly describes the context for the plan, significance of natural resources, management strategies, and connection to other plans and authorities (e.g., Skagit River Management Plan, adjacent Forest Service plans, Seattle City Light's 30 year hydroelectric license). The document is also incredibly easy to follow and provides outstanding photographs

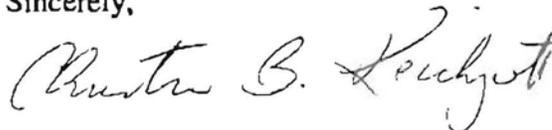
and watercolors that help the reviewer understand the setting and resource values of the NRA. We support the Preferred Alternative, Alternative B, and believe that this document will provide a management direction that protects and preserves resources, provides for a positive visitor experience, and a method for monitoring and assessing impacts over the life of the General Management Plan. Based on our review and evaluation, we have assigned a rating of LO (Lack of Objections) to the draft EIS. We have suggestions for you to consider including in the final EIS related to energy efficiency, green building, and stormwater management.

We acknowledge that "Energy Requirements and Conservation potential" were included in the topics dismissed from further consideration. However, we believe that a summary of the practices and federal requirements related to green building and conservation such as the list below is appropriate to include in the EIS (e.g., in Table 2.1). We recommend that they be considered in developing the final EIS and during development of new facilities.

- Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance. This EO directs agencies to utilize environmentally preferable materials, products, and services and to design, construct, maintain, and operate high performance sustainable buildings.
- Energy Independence and Security Act of 2007 (EISA), Section 438
 - Stormwater: EISA Section 438 requires federal agencies to develop and redevelop facilities with a footprint that exceeds 5,000 square feet in a manner that maintains or restores the pre-development site other impacts.
Hydrology to the maximum extent technically feasible.
<http://www.epa.gov/owow/nps/lid/section438/>
- LEED Certification. The General Services Administration requires new projects to achieve LEED Silver, DOE requires LEED Gold. CBP requires LEED Certified.
- Low Impact Development and cost-efficient, environmentally friendly landscaping. EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use.
<http://www.epa.gov/osw/conservation/rrr/greenscapes/index.htm>

Thank you for the opportunity to review this DEIS. If you would like to discuss these issues, please contact Lynne McWhorter of my staff at (206) 553-0205, or via email at mchworter.lynne@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Construction Mitigation Measures Adopted for Several Major Projects in California

A. Administrative

1. Have a Mitigation Plan that is included in the FEIS and committed to in the ROD.
2. Require reporting.
 - a. Prepare inventory of all equipment prior to construction.
 - b. Report on suitability of add-on controls for each piece of equipment before groundbreaking.*
 - c. Evaluate other engine alternatives: electric, CNG, LNG, fuel cell, alternative diesel.
 - d. Monthly, public reports by Environmental Coordinator regarding fulfillment of requirements
3. Have suitability report subject to review by Air District, USDOT, State DOT, EPA and the public.

B. Equipment

1. Use add-on controls such as catalysts and particulate traps where suitable.
2. Use fuel with 15 ppm of sulfur or less unless unavailable.
3. Establish idling limit (e.g., 5-10 minutes per hour).
4. Tune to manufacturers' specs and do so at manufacturers' recommended frequency.
5. Prohibit any tampering with engines and require continuing adherence to manufacturers' recommendations.
6. Require that leased equipment be 1996 model or newer unless cost exceeds 110% of average lease cost.
7. Require 75% of total horsepower of owned equipment to be used to be 1996 or newer models.

C. Work limitations

1. Establish a cap on daily emissions and/or hours of work.
2. Use no more than 2 pieces of equipment simultaneously near or upwind from sensitive receptors.
3. Establish additional emissions limits within 1000 feet of any K-12 school.
4. Provide notification to all schools within 1000 feet.
5. Reduce truck trips and/or restrict hours of driving through communities to minimize risk.

* Suitability of control devices is based on whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused by the construction equipment engine, or whether there may be a significant risk to nearby workers or the public. Such determination is to be made by the Contract Project Manager (CPM) in consultation with the appropriate vendor.

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 3

Author Information

Keep Private: No
Name: John Sibold
Organization: WSDOT Aviation
Organization Type: I - Unaffiliated Individual
Address:
Arlington , WA 98223
USA
E-mail: siboldj@wsdot.wa.gov

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 07/30/2010 Date Received: 07/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As Director of Aviation for the Washington State Department of Transportation, I am concerned by the alternatives being proposed that would restrict aviation access to Ross Lake. WSDOT is responsible for preserving the state's transportation system to accommodate all types of aviation activities, such as, seaplane access. Similarly, we operate 16 airports primarily in the backcountry, some of which we manage on behalf of federal partners including the Stehekin Airport. The purpose of these airports is to provide access to remote areas for recreation and more importantly emergency services. In our years of experience backcountry aviation including seaplanes activity has maintained a compatible relationship with other users of federal lands and has provided public benefit. As a result we see no justification to change park management policy that would restrict seaplane access to Ross Lake. Thank you for your consideration.

John Sibold
WSDOT Aviation Director

Sept 30, 2010

SEP 30 2010

We, the undersigned, support shifting the boundary of Ross Lake National Recreation Area (NRA) to include more land into North Cascades National Park. We make this suggestion as the National Park Service contemplates changes to how it manages the Ross Lake National Recreation Area through proposed draft changes to its General Management Plan. The Ross Lake NRA is part of the North Cascades National Park complex and is at the heart of our region. National park sites such as the North Cascades and Ross Lake provide key habitat for wildlife such as salmon, fishers, black bears and wolves. Visitors come to the greater North Cascades because of its wildlife and natural wonders and for the area's recreational opportunities, including its visitor centers, trails and campgrounds. Sustaining and protecting those important recreation and natural values while also working to increase that visitation is critical to a sustainable and healthy economy and environment. We feel that redrawing the boundaries of the Ross Lake NRA to provide for more land within the North Cascades National Park proper would likely increase visitation and would be a low cost way of improving visitors' experience and would provide for better protection of natural and cultural wonders.

We feel a greater focus on North Cascades National Park would be a key driver for our regional economy. Research shows that for every dollar invested in national parks, four dollars are returned to park gateway communities. Across the country, national parks generate approximately \$12 billion and support over 200,000 jobs. In the North Cascades, federal and visitor spending pumps roughly \$15 million into local communities and supports more than 350 jobs.

Park visitation drives these numbers. The national park system is made up of nearly 400 park units, but only 58 are National Parks. The remainder is national recreation areas, national historic sites, national monuments, and other units. The entire national park system saw record visitation last year with more than 274 million. More than 62 million of these visitors went to national parks such as Yellowstone, Mount Rainier and Denali. National parks drew the largest number of visitors in part because of their higher public profile and we'd like to see that higher profile attached to North Cascades

Therefore, we the undersigned support the National Parks Conservation Association's call for shifting Ross Lake NRA acreage into the North Cascades National Park.

Sincerely,

Pola Kelley
Executive Director
Sedro Woolley Chamber of Commerce

Carl Weimer
Whatcom County Commissioner



City of Seattle

Michael Patrick McGinn, Mayor

Seattle City Light

Jorge Carrasco, Superintendent

September 30, 2010

Chip Jenkins, Superintendent
Attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284-1239

Re: Ross Lake National Recreation Area GMP Alternatives

Dear Mr. Jenkins:

Seattle City Light (City Light) appreciates the opportunity to provide comments on the Draft General Management Plan and Environmental Impact Statement (GMP) (July 2010) for the Ross Lake National Recreation Area (NRA). City Light and the National Park Service (NPS) have enjoyed many years of shared projects and collaboration in this area and we are pleased to participate in the planning for the future use and preservation of the NRA. We commend the NPS for a well-written document, the thoughtful definition of GMP management zones, and the range of alternatives provided for review.

City Light respectfully submits the following general comments on the GMP for your consideration. Attached to this letter are specific corrections and points of clarification related to City Light's Skagit operations and license obligations for resource protection.

Comments on Draft GMP

- **Colonial Creek Campground Boat Launch** – City Light looks forward to working with the NPS on the possible movement of the boat launch from Colonial Creek Campground to the north side of the highway in the vicinity of the Diablo Lake boathouse. However, very recent security measures recommended by the Pacific Northwest National Laboratory (PNNL), a division of the Department of Energy, should be mutually reviewed to fully determine what, if any, vehicular access restrictions may be recommended to safeguard the dam itself.
- **Newhalem Skagit General Store and Main Street** – City Light is in the process modifying the interior of the Skagit General Store to include a deli that would be available to NRA visitors as well as City Light staff. This will enhance the store to better serve NRA visitors. In addition, City Light has retained architects and other designers to formulate plans and documents to revitalize the Gorge Inn and, possibly, the Hotel. These two facilities, potentially packaged with the store, may be



700 Fifth Avenue, P.O. Box 34023, Seattle, WA 98124-4023

Tel: (206) 684-3000, TTY/TDD: (206) 684-3225, Fax: (206) 625-3709

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Chip Jenkins
September 30, 2010
Page 2

offered to concessionaires for public use if approved by the NPS. Services provided by the concessionaires could include food preparation and service and overnight accommodations. However, at this time, City Light's plans for Skagit facilities have not been finalized and specific details should not be included in the GMP.

- **Diablo Townsite: Hollywood and Reflector Bar** – Recent federal security restrictions and other requirements have forced City Light to reconsider plans of land exchange at Hollywood and Reflector Bar. Critical staff for City Light will now be housed in Hollywood and not Reflector Bar as previously planned. The cookhouse and all housing and residential storage facilities at Reflector Bar will be removed. City Light is open to continued negotiations regarding possible partial sale of the Hollywood property that might include some or all of the houses. City Light is also open to discussions with NPS on the rental or lease of some number of houses in Hollywood. In lieu of this, City Light plans to remove all houses not immediately on Diablo Road with the exception of House 6 and the emergency response structures.

City Light is committed to working with the NPS to improve access to and visibility of the Stettalle Creek and Sourdough Mountain trails. In addition, City Light will work with the NPS in designing the interior of the Ross Lodge in a manner that will meet NPS needs for a facility in Diablo.

- **Ross Dam: Road Access** – A Probable Failure Mode Analysis (PFMA) performed on Ross Dam by independent consultants, and taken up by the Federal Energy Regulatory Commission (FERC), has noted that access to the dam during times of storm, flood or other emergencies may not be available via existing means. A recent rockslide that has blocked the Ross Dam Access Road for the majority of 2010 underscores this threat. Failure to station personnel properly could threaten the dam itself and possible populations and properties downstream. City Light encourages the NPS to consider the possibility of a road approximately 1 mile in length between Washington State Route 20 and Ross Dam itself. This road could be (1) restricted to NPS or City Light use only; (2) restricted to emergency use, either for evacuating injured public users or for accessing the dam; (3) used to ferry boats and equipment for Ross Lake Resort; or (4) some combination thereof. City Light asks the NPS to also consider the environmental risk to Diablo Lake associated with the existing operational challenges of barging large amounts of petroleum products to Ross powerhouse and the Ross Lake Resort. A road could limit this risk for these and/or similar products.
- **Newhalem and Diablo Waste Water Treatment Plants: Future Plans** – In the future, City Light will remove existing Waste Water Treatment Plants at Newhalem and Diablo. These plants will be replaced by drainfields and associated septic systems. An engineering study has been completed that supports the advantages to these systems.
- **Cultural Resource Conditions: Skagit River Hydroelectric Project Zone, Historic Structures** – City Light understands the importance of maintaining historic structures in Diablo and Newhalem and is actively working to revitalize many of



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Chip Jenkins
September 30, 2010
Page 3

these facilities. At the same time, as noted in the GMP, some housing and other buildings will be removed. City Light has also recently completed an update National Historic Register nomination for the Skagit River and Newhalem Creek Hydroelectric Projects. There are now over 70 buildings, structures, and objects that are eligible for listing on the National Register. The final GMP should reflect the results of this assessment.

- **Climbing** – It is difficult to determine if climbing could present access or security issues at City Light’s facilities without knowing the exact location of the four areas agreed upon between the NPS and the climbing community. City Light is concerned about existing and new routes that require access across the Gorge Bypass Reach and/or parking along Highway 20 between Newhalem and Diablo. Public access to the Gorge Bypass Reach is prohibited due to potential hazards from water releases from Gorge Dam. In addition, parking along the narrow road between Newhalem and Diablo is a safety hazard that will require coordination with the State Department of Transportation to resolve.
- **Campgrounds** - Development of a campground near the aggregate ponds is likely to be inconsistent with management this area as salmon habitat, which is required in the Settlement Agreement for the Skagit License. However, City Light is willing to work with the NPS to identify locations for a new campground that may exist on other City Light-owned property

City Light values its partnership with the NPS in the Ross Lake NRA. We trust that you will consider our comments to refine the preferred alternatives presented in the GMP. If you have any questions, please call Andy Strong, Interim Power Production Director at (206) 386-9741, or Colleen McShane, Manager of Natural Resources and Environmental Planning at (206) 684-4238.

Sincerely,



Michael J. Haynes
Power Production Director

CM:sw



700 Fifth Avenue, P.O. Box 34023, Seattle, WA 98124-4023
Tel: (206) 625-3000, TTY/TDD: (206) 684-3225, Fax: (206) 625-3709

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**ROSS LAKE NATIONAL RECREATION AREA
DRAFT GENERAL MANAGEMENT PLAN**

**SEATTLE CITY LIGHT'S
POINTS OF CLARIFICATION, CORRECTIONS, AND SUGGESTIONS**

VOLUME 1

1) Page 1, paragraph 3.

Suggested changes:

The hydroelectric facilities and portions of the townsites at Newhalem and Diablo comprise the Skagit River ~~and Newhalem Creek~~ Hydroelectric Projects Historic District, which was listed on the National Register of Historic Places in 19960.

Comment: Not all of Diablo and Newhalem are part of the Historic District. The official title is the Skagit River Hydroelectric Project Historic District; it encompasses facilities associated with both the Skagit River and Newhalem Creek hydroelectric projects. It may be worth noting that the boundaries of the historic district extend in a linear, but disconnected, fashion along the Skagit River, from the town of Newhalem to the Ross Powerhouse and Dam.

2) Page 1, paragraph 4

Suggested changes:

Vehicular access is limited to ~~the Ross Dam parking area from the U.S. side and to~~ the Hozomeen area ~~from in~~ Canada.

Comment: There is no vehicle access to Ross Lake from the parking area.

3) Page 2, paragraph 2

Suggested changes:

Located partially within Ross Lake NRA, the Skagit River is the only Puget Sound tributary to support all native species of anadromous salmonids; the river just downstream of the RNA ~~and~~ hosts one of the highest concentrations of wintering bald eagles in the lower 48 states.

Comment: As written, this sentence is somewhat misleading. The entire Skagit River is not in Ross Lake RNA and the high concentrations of wintering bald eagles actually occur outside the RNA.

4) Page 2, paragraph 6

Suggested changes:

Within Ross Lake NRA, year-round residents live and work in Newhalem and Diablo to provide operational functions for ~~the~~ Seattle City Light and to support NPS and county services.

Comment: Staff from the Park Service, North Cascades Institute, and Whatcom County also live in Diablo and Newhalem.

5) Page 7, paragraph 3

Suggested changes:

This agreement had to be approved by FERC, which, after many additional meetings, hearings, and negotiations later, occurred on ~~June 26, 1996~~ May 16, 1995, when FERC issued an order for the Skagit River Project's new license.

6) Page 7, paragraph 4

Suggested changes:

In 1990~~6~~, the Skagit River ~~and Newhalem Creek~~-Hydroelectric Project Historic District was listed on the National Register of Historic Places. The original listing District included ~~ds~~ more than 30 contributing resources, such as Diablo Dam, Gorge Powerhouse, and historic houses and structures related to the Skagit and Newhalem Hydroelectric Project. The National Register nomination was updated in 2010 and the District now encompasses more than 70 contributing resources, including Ross Dam and Powerhouse.

7) Page 16, Interpretive Theme 8. Skagit River

Suggested changes:

Significance: The Skagit is the largest river draining into Puget Sound. Stable flows help make it the only Puget Sound tributary to host all native species of anadromous salmonids; it also supports ~~and~~ one of the highest concentrations of wintering Bald Eagles in the lower 48 states. Stable flows resulting from the Skagit Hydroelectric Project improve salmon survival and spawning success.

Comment: Stable flows are not the reason the Skagit River hosts all species of anadromous salmonids or high concentrations of winter bald eagles. Stable flows do influence salmon spawning success and survival.

8) Page 18, Interpretive Theme 11. Hydropower Landscape

Suggested changes:

The story of creating one of the last great wilderness parks in the lower 48 states and the ongoing struggle about how to provide for wilderness preservation, a

national park experience, and Seattle City Light's needs for hydropower development began with the creation of North Cascades NPS Complex and continued through the landmark FERC negotiation and settlement. Today, the two organizations partner on a variety of education, research, monitoring, and interpretive activities in the NRA.

9) **Page 44, bullet 1**

Suggested changes:

Climate change ~~could also~~ is likely to alter how Seattle City Light operates the Skagit River Hydroelectric Project to optimize generation and meet recreation, fisheries, and flood control obligations. ~~dramatically affect reservoir water levels, and therefore~~ These changes may affect Seattle City Light's power generation capability as well as ~~reservoir-based~~ visitor recreation.

Comment: This statement is based on Seattle City Light's most recent Integrated Resource Management Plan.

10) **Page 44, bullet 4**

Suggested changes:

The Skagit River Hydroelectric Project Historic District is listed on the National Register of Historic Places. It includes the parts of the towns of Newhalem and Diablo, the Gorge, Diablo, and Ross Powerplant Complexes, Ladder Creek Gardens, and Diablo Powerplant Complex ~~a number of houses and other buildings built between 1917 and 1960.~~ Under the relicensing agreement, the City of Seattle must evaluate their buildings and structures for historic significance and update the National Register nomination on a regular schedule. ~~Seattle City Light is currently evaluating additional sites for National Register eligibility, including Ross Dam and powerhouse and the Hollywood housing district in Diablo Townsite.~~ The GMP could identify mechanisms for future management that comply with NPS standards.

Comment: The update to the National Historic Register nomination is complete and now includes over 70 structures and objects. In addition, Seattle City Light may not need to conduct additional updates since the Washington State Department of Archeology and Historic Preservation has agreed the period of significance for the entire district ends in 1960, with the completion and operation of all facilities associated with the Skagit River and Newhalem Creek Hydroelectric Projects. Thus, the eligibility of all potentially significant structures has been evaluated as of 2010.

11) **Page 63, Hydroelectric Zone, paragraphs 1, 3, and 5**

Suggested changes:

National Register ~~and National Register eligible~~ sites would be preserved and used in conjunction with ~~the operation of~~ Seattle City Light operations.

To the extent possible, ~~H~~historic structures would be maintained and functional through established use or adaptive reuse.

Seattle City Light would continue its responsibilities to identify, preserve, rehabilitate, and interpret their cultural resources ~~and nominate them to the National Register~~, as appropriate.

Comment: See comment above.

12) **Page 65, Skagit River Zone, paragraph 6**

Suggested changes:

Motorboat restrictions on the Skagit River would vary by alternative, except for emergency, law enforcement, and NPS and Seattle City Light operational, research, and monitoring needs.

13) **Page 65, Hydroelectric Zone, paragraphs 2 and 4**

Suggested changes:

Seattle City Light would continue to provide the visitor services stipulated in the Settlement Agreement and FERC license. These include guided tours of the Skagit Project; operation of the Skagit Visitor Information Center; operation of the tug boat/ferry service on Diablo Lake; maintenance of public facilities in Diablo and Newhalem; and maintenance of Ladder Creek Falls trail.

Motorboats would be allowed on the reservoirs except for spatial or temporal restrictions that could apply for emergency, law enforcement, and NPS and Seattle City Light operational needs.

Comment: First statement needs more definition. Second statement is unclear.

14) **Page 71 and Figure 1.2**

Comment:

Figure 1.2 shows Big Beaver Valley and Thunder Creek Arm as Potential Wilderness. On page 71 Thunder Arm is proposed as an addition to the Stephen Mather Wilderness Area because of Seattle City Light's decision that a hydroelectric project on this creek is not economically or environmentally feasible. Big Beaver is not mentioned at all, leaving the reader to wonder why. Suggest adding the following to the discussion on wilderness and backcountry on page 71:

In recognition of Seattle City Light's easements under the Skagit River Treaty, Big Beaver Valley is not proposed for wilderness designation at this time.

15) **Page 72, Wild and Scenic River, paragraph 6**

Suggested changes:

The Skagit River ~~below-between~~ Gorge Dam ~~and Gorge Powerhouse~~ was found ineligible because the limited water in this reach does not meet the free-flow requirement of wild and scenic river eligibility.

16) **Page 77, Climate Change**

Comment: Consider adding a sentence on coordinating with Seattle City Light on appropriate conservation measures for NPS facilities in the NRA.

17) **Page 81-84, Maps**

Comment: Please add Gorge Dam and vicinity to the Hydroelectric Zone to Figures 4.2 and 4.3.

Comment: Also, the water in the parts of the reservoirs appears as dark pink, which is not in the legend. Is this a color artifact resulting from the blue hatching designating water overlaying the orange for the backcountry zone?

18) **Page 85, paragraph 3**

Suggested changes:

New camping facilities could be considered and constructed at Newhalem Creek Campground, ~~and~~ Upper and Lower Goodell group sites, ~~and in consultation and cooperation with SCL at the aggregate ponds near the lower portions of the Skagit River.~~ Other sites may be identified in cooperation with Seattle City Light.

Comment: As stipulated in the Settlement Agreement, Seattle City Light was required to develop the aggregate ponds (also known as Newhalem Ponds) as fish channel spawning and rearing habitat. This work was accomplished in 1996. In addition, the Settlement Agreement states that:

The City shall leave undisturbed the existing riparian zone around all pond and channel habitat unless such disturbances are approved in advance by the Non-flow Coordinating Committee.

Development of a campground near the aggregate ponds is likely to be inconsistent with management this area as salmon habitat. However, opportunities for a new campground may exist on other Seattle City Light-owned property.

19) **Page 87, paragraph 1, Seattle City Light Visitor Facilities**

Suggested changes:

In addition to NPS facilities, Newhalem also contains the visitor facilities operated by Seattle City Light, including the ~~SCL-visitor~~ Skagit Information

[Centerecontact station](#), which serves as the starting point for tours of the Skagit power facilities, trails, and the Skagit General Store.

20) Page 87, paragraph 6, day hiking

Comment: Seattle City Light is open to partnering with NPS on new trails in the Newhalem area. It would be helpful to know where these might be.

21) Page 87, paragraph 8, North Cascades Environmental Learning Center

Suggested changes:

The North Cascades Institute would continue to work in cooperation with the NPS [and Seattle City Light](#) on plans for the ELC and management of the area.

Comment: Please acknowledge Seattle City Light as a partner in the operation and maintenance of the ELC.

22) Page 88, paragraph 5, Diablo Townsite

Suggested changes:

In 1990~~89~~, ~~six~~ five buildings and structures in Diablo Townsite were listed on the National Register of Historic Places. ~~Five of these structures are on Reflector Bar and are as part of the Skagit River and Newhalem Creek Hydroelectric Project Historic District that was designated in 1996. To comply with the Federal Energy Regulatory Commission (FERC) license agreement, In 2010~~ Seattle City Light is completed an evaluation of the remaining buildings, structures, sites, and landscape elements associated with the Skagit River Hydroelectric Project to determine their historical significance and eligibility for nomination to the National Register. The historic district has been expanded and now includes 47 contributing resources in Diablo townsite. This analysis will help inform future use of the facilities.

Comment: Diablo Dam was one of the 6 structures listed in the Diablo area of the historic district; the dam, however, is not part of the townsite. Seattle City Light would be happy to provide NPS with a copy of the latest National Register of Historic Places (2010) for updated information on historic resources.

23) Page 97, paragraph 7, Boating

Suggested changes:

Motor boats would be excluded on the Skagit River, except for emergency, law enforcement, NPS and Seattle City Light operational, research, and monitoring needs.

24) Page 128, Ecosystem Functions and Processes: Mass Wasting, Alternative B

Suggested changes:

Work with Seattle City Light, the Washington State Department of Transportation, the Federal Highway Administration, and others to ~~improve-avoid~~ maintenance practices that trigger events and maximize ~~mitigation-for~~ actions taken to protect roads and infrastructure.

25) Page 136, Science Communication, Alternative B

Suggested changes:

Engage partners, such as North Cascades Institute and Seattle City Light, in the process of communicating the results of research and monitoring to a wider public audience

26) Page 146, Motor Boats of the Skagit River, Alternative B

Comment: See Comment 20 on motor boat use for research and monitoring.

27) Page 148, Sport Climbing in the Skagit Gorge, all alternatives

Comment: Is there an annual process for evaluating the four agreed upon climbing areas and any newly designated climbing routes to determine use by nesting peregrine falcons and the need for temporary closures?

28) 25) Page 166, Campgrounds, Alternative B

Comment: See Comment 16 on concern with aggregate pond site.

29) Page 176, Seattle City Light, all alternatives

Suggested changes:

Continue to work cooperatively with Seattle City Light and international agencies and organizations, including the Skagit Environmental Endowment Commission, to develop projects and conduct programs for the international benefit of the Upper Skagit Watershed.

Comment: SEEC operates under the auspices of the City of Seattle, not Seattle City Light (although Seattle City Light provides staff support and funding).

Suggested changes:

Continue to provide utilities and infrastructure to ~~support a Canadian crew, employed by~~ Seattle City Light ~~who-for~~ maintenance duties associated with Ross Lake reservoir on both sides of the Canadian border. ~~Continue to provide housing for Canadian and U.S. interpreters at Hozomeen.~~

Comment: Seattle City Light appreciates the support of NPS at Hozomeen but is under no obligation to hire a Canadian crew for maintenance duties associated with Ross Lake

reservoir. Why housing for interpreters is included in this section on cooperation and collaboration with Seattle City Light? The NPS provides housing for Canadian and U.S. interpreters at Hozomeen.

30) Page 202, Fish and Wildlife, Alternatives B, C, and D

Suggested change – Alternative B

Impacts to wildlife from hunting and fishing would continue to cause negligible to minor impacts to fish and wildlife [populations](#).

Comment – Alternatives C and D: Why are the effects of climate change on fish and wildlife populations mentioned for these two alternatives and not alternatives A and B? It seems like the effects of climate change would be similar for all alternatives and should either be discussed under each or none.

31) Page 204, Historic Structures and Cultural Landscapes, all alternatives

Comment: This section should be modified for all alternatives to reflect the 2010 update to the National Historic Register and the uncertainty associated with NPS acquisition of the entire Hollywood area.

VOLUME 2

32) Page 3, paragraph 5

Suggested change

~~The Newhalem Project includes several historic cultural resources and recreational amenities that are also tied to the Skagit River Project. These include the National Register listed “company towns” and associated hydroelectric infrastructure in Diablo and Newhalem, the Ladder Creek Falls Trail and the Trail of the Cedars.~~

Comment: Suggest deleting the paragraph as it confusing. The two company towns and associated hydroelectric infrastructure in Diablo and Newhalem and Ladder Creek Falls Trail are considered part of the Skagit River Project. There are no historic cultural resources associated with the Newhalem Project except the powerhouse site (the powerhouse burned).

33) Page 69, Seattle City Light

Suggested change

Seattle City Light is a key partner of the NPS on numerous visitor information, maintenance, and resource management projects. Seattle City Light is a publicly-owned utility that manages ~~the Skagit Hydroelectric Project~~—a complex of four

hydroelectric dams within Ross Lake NRA. Seattle City Light constructed and owns the North Cascades Environmental Learning Center and operates two “company towns” within Ross Lake NRA for its employees. Additional explanation about Seattle City Light and its projects are located in the chapter under “Skagit River Hydroelectric Project” and “Newhalem Creek Hydroelectric Project.”

34) Page 70, photo caption

Typo (Diable vs Diablo)

35) Pages 107-108, Historic Structures and Cultural Landscapes

Comment: Suggest revising this section to reflect the updated National Historic Register nomination and the uncertainty of NPS acquisition of the entire Hollywood area of Diablo. In addition Seattle City Light’s plans for housing and building renovations in Newhalem and Diablo are not final and should probably not be described in detail in the GMP.

36) Pages 211-217, Appendix B

Comment: See comment 31; suggest working with Seattle City Light to revise this appendix.



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

September 15, 2010

Mr. Palmer L. Jenkins
Superintendent
National Park Service
North Cascades National Park Complex
810 S.R. 20
Sedro-Woolley, Washington 98284-1239

In future correspondence please refer to:
Log: 091510-02-NPS
Property: Ross Lake National Recreation Area
Re: Draft General Management Plan

Dear Superintendent Jenkins:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the National Park Service (NPS) Draft General Management Plan (GMP) for Ross Lake National Recreation Area (NRA). In response, I have reviewed the Draft GMP/Environmental Impact Statement (EIS) Executive Summary included with your letter. As a result of the review, I am providing the following comments/recommendations for your consideration:

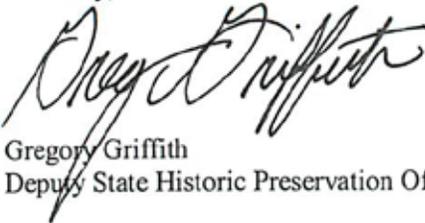
1. DAHP supports and appreciates the NPS effort to update its GMP for the Ross Lake NRA. We also note and support discussion in the GMP about planning issues in the various alternatives affecting historic and cultural resources within the NRA.
2. DAHP views the GMP as a document that identifies NPS land use management policies as well as specific projects, in concept only. Therefore, please keep in mind that once the preferred alternative is selected and the Ross Lake GMP is finalized, actual implementation of projects identified in the plan will require review by DAHP under the provisions of Section 106 of the National Historic Preservation Act (NHPA). This review requires specific steps and detailed information including: defining the area of potential effects (APE), identifying all cultural resources within the APE, determining how significant cultural resources will be affected, and implementing mitigation measures when these cultural resources are adversely affected.
3. We note that all the GMP alternatives describe a potential exchange between Seattle City Light and NPS of land at Hollywood for land at Reflector Bar. Knowing that historic properties have been identified in both areas, DAHP will look forward to Section 106 consultation with the NPS when this action is initiated. For your information, existing information on historic properties in Hollywood, Reflector Bar, and elsewhere in the NRA can be accessed by visiting DAHP's interactive on-line WISAARD database at www.dahp.wa.gov.



4. We understand from your letter that a programmatic agreement (PA) will be drafted that will identify specific actions from the GMP affecting cultural resources (such as the proposed land exchange) or will be reviewed programmatically. In the meantime, we look forward to reviewing and commenting on a draft document.
5. Finally, on behalf of the State Historic Preservation Officer (SHPO) and DAHP staff, I would like to extend an invitation to you and your staff to participate with us here at our Olympia office in training on Section 106 and other NHPA programs. DAHP staff members have acquired considerable skills in training cultural resource professionals and non-professionals alike in historic preservation principles and processes.

In closing, thank you for the opportunity to review and comment on the Draft GMP for the Ross Lake NRA. We look forward to working with you and your staff successful implementation of the plan and your efforts to protect significant cultural resources within the park. Should you have any questions, please feel free to contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Jesse Kennedy
Gretchen Luxenburg
Bob Mierendorf



PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 578

Author Information

Keep Private: No
Name: Kerri Woehler
Organization: Washington State Department of Transportation, Northwest Region/Mount Baker Area
Organization Type: I - Unaffiliated Individual
Address: 1043 Goldenrod Road
Suite 101
Burlington, WA 98233-3415
USA
E-mail: woehlek@wsdot.wa.gov

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on the Draft General Management Plan and Environmental Impact Statement for the Ross Lake National Recreation Area. National Park Service staff involved the Washington State Department of Transportation (WSDOT) early in the plan development process, and we appreciate the opportunity to participate and comment. We provide the following comments for your consideration and look forward to working with the National Park Service as the plan is implemented.

As you know, the North Cascades Highway (SR 20) is a regionally significant highway that provides a vital connecting route across the Cascades in northern Washington State. Management of the portion of the highway addressed in the plan is governed by a Highway Easement Deed with the Secretary of the Interior acting by and through the National Parks Service. That easement specifies the terms and conditions of the design, construction, and preservation of the highway.

We offer the following comments for your consideration:

IMPROVEMENTS

The preferred alternative recommends several improvements including signage, parking and pullouts. WSDOT's funding is extremely limited; however, we often help other agencies that have their own funding complete projects on or near the state highways, and we would be happy to assist you as you implement these plan recommendations.

Anything constructed along SR 20 would require close coordination between WSDOT and National

Parks, consistent with the Highway Easement Deed. The following are a few considerations:

? Improvements should be consistent with WSDOT's Design Manual and access management practices.

? The addition of permanent signage on the highway requires approval from our traffic engineer and would be installed by our maintenance crews.

? Design standards guide the placement of turn lanes based on traffic operations and roadway geometry. Changes to roadway channelization, such as the proposal to add a turning lane at the Ross Dam Trailhead Parking Lot, must be evaluated by our traffic engineer.

? A traffic control plan for the time of construction would be needed to avoid potential traffic hazards.

? This section of SR 20 is designated a Washington State Scenic and Recreational Highway. That designation comes with additional requirements, particularly related to the aesthetics of any improvements made along the corridor. We support the National Parks Service's proposal to prepare the corridor so it would be eligible for nomination as a Nationally Designated Scenic Byway.

MAINTENANCE AND PRESERVATION ACTIVITIES

The preferred alternative proposes future coordination between the National Park Service and WSDOT on maintenance and preservation practices. It is important for WSDOT to maintain flexibility in these practices in order to respond to changing conditions. Maintenance activities identified in the plan and EIS include:

? Avalanche control

? Plowing of overlooks and trailhead areas

? Hazard tree management

? Vista clearing

? Non-native plant management

? Gravel storage location areas

These topics are addressed by the Highway Easement Deed. WSDOT and the National Park Service work together to implement the deed, and this close coordination will be important as we move forward.

The preferred alternative also calls for the agencies to develop a proactive approach to avoid catastrophic channel avulsion and road closure, and minimize impacts to fish populations and other resources. Although WSDOT's funding is extremely limited, we look forward to coordinating these activities with your agency within the constraints of our budget.

SKAGIT WILD AND SCENIC RIVER STUDIES

The National Parks Service recommends that Congress extend the Skagit Wild and Scenic River designation to include an 11-mile upper Skagit segment and the two largest tributaries flowing into this reach.

WSDOT's environmental goal is articulated in the agency's Strategic Plan: "To enhance Washington's quality of life through transportation investments that promote energy conservation, enhance healthy communities, and protect the environment." WSDOT believes that the proposed Wild and Scenic River designation is consistent with this goal. WSDOT currently maintains highways within the boundaries of

designation. If this segment of the Skagit River and its two largest tributaries receive federal Wild and Scenic River designation, WSDOT will look forward to participating in the subsequent development of the management plan for the river.

We thank you again for the opportunity to comment on the draft General Management Plan and Environmental Impact Statement. Please do not hesitate to contact me at 360.757.5981 or woehlek@wsdot.wa.gov if you have any questions or if I can be of assistance.

Sincerely,

Kerri Woehler
Planning Manager
Washington State Department of Transportation
Northwest Region/Mount Baker Area

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 48

Author Information

Keep Private: Yes
Name: Mark T. Masciarotte
Organization: Aeromarine Publishing Corp.
Organization Type: I - Unaffiliated Individual
Address: 4511 DuBois Drive
Vancouver, WA 98661
USA
E-mail: aeromarine.publishing@comcast.net

Correspondence Information

Status: Reviewed Park Correspondence Log: 515
Date Sent: 09/14/2010 Date Received: 09/14/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

My company operates a seaplane in the course of doing business. Our activities bring us to three types of lakes. The first are remote lakes that are only accessible by seaplane or helicopter.

The second type has more available access, aided, in some cases, by primitive roads, trails or boat launches. Due to their relative inaccessibility, these bodies of water are visited infrequently by any kind of aircraft.

The third type is the urban lake or river, bodies of water such as Lake Union or the north and south ends of Lake Washington, that have relatively large volumes of seaplane traffic.

It has been our experience that Ross Lake falls into the second category. Seaplane operations are infrequent, and there is no doubt that boat traffic far exceeds airplane activity. Having spoken to campers and rangers, it would appear to me that the seaplane operations at Ross Lake raise no more concern than they do at Stehekin, where complaints are rare. Indeed, it has been our experience that seaplanes are often a welcome addition to the community of families and individuals who use the lake.

It must be remembered that the costs associated with seaplane operations limit the number of aircraft in the national fleet. This number is not rising. Therefore, it is extremely doubtful that any of the lakes in our parks or recreation areas will see any uptick in operations over the coming years. This includes Ross Lake.

As to the management plan's recommendations, it must be remembered that when seaplane activities do occur, safety must remain a priority. For this reason, the entire surface of the lake (except for designated swimming areas, of course) should remain accessible for pilots to plan safe approaches for landing and

safe departure corridors after takeoff.

I sincerely hope that the NPS does not limit seaplane use to the extreme ends of the lake. Like boats, seaplanes can access many shoreline campsites, and it is patently unfair to any type of user to deny access. If boats are allowed to access an area, seaplanes should be given access as well.

My family and I backpack overnight and also camp using our canoe, so I understand and appreciate what the NPS terms a place's "soundscape." I also appreciate that our airplane is noisy for several minutes during takeoff, but since we often fly in noise-sensitive areas, we, like most backcountry pilots, make it a practice to "fly friendly" by reducing propeller speed as soon as it is safe to do so.

In closing, I ask that the NPS does not fall into the trap of creating a hierarchy of users at Ross Lake. Whether hikers, boaters, horsemen or pilots, we all enjoy the backcountry and should be able to share the resources equally.

KENMORE AIR™ harbor inc.

467

6321 NE 175th Street, Kenmore, WA 98028

duplicate 926

Kenmore Air, "The Seaplane Airline" • Kenmore Air Express • Kenmore Air Cargo • EDO Floats

September 8, 2010

** also entered in paper #347*

✓ ask

RECEIVED
SEP 09 2010
MBRD/NOCA

Mr. Palmer "Chip" Jenkins, Superintendent
North Cascades National Park Complex
810 State Route 20
Sedro-Wooley, WA 98284-1239

Regarding: Ross Lake National Recreation Area Draft General Management Plan

Dear Superintendent Jenkins,

Kenmore Air has reviewed the Draft Management Plan and the measures outlined in Preferred Alternative B. We are keenly disappointed to see restrictions on seaplane access to Ross Lake and are hopeful that your office is open to a re-evaluation of the need for such limitations.

Kenmore Air's comments stem from our 64 years of experience in operating commercially to and from Ross Lake. Kenmore Air is based in Seattle and is the largest and most active commercial seaplane operator in the northwest. Our company carries more than 150,000 passengers and flies more than 2 million air miles annually with its more than 20 seaplane aircraft. Arguably, Kenmore Air would be responsible for the majority of commercial flights into and out of Ross Lake. Commercial flights however, are rare events. A review of our aircraft charter records for flights into and out of Ross Lake yield a total of 10 individual flights between 1998 and September of this year-a nearly 12 year period. In no single year did the total exceed two flights and in several years none were conducted at all.

While seaplane activity to and from Ross Lake is scarce this mode of transportation is never the less an important and often critical element of public access to the lake. Informal testimony from Kenmore pilots indicates that although the majority of flights to Ross Lake have a destination at the southern end of the lake, a number of flights have also gone to the campsite area suggested for seaplane limitation. Most, if not all, of these park guests arriving by seaplane would not have been able to enjoy their experience in the park with friends and family if it were not for the fast and convenient access provided by seaplanes. It strikes us as unnecessary, especially here in the northwest, to limit this longstanding and culturally accepted means of access when there is no record of complaints or history of excessive seaplane use within the Park.

Phone 425.485.4774 • Toll-Free 800.543.9595 • Fax 425.485.4774 • KenmoreAir.com

Our company and seaplane proponents, both private and commercial, have long accepted the rationale that where motorized vessels are prohibited on a body of water it often makes sense to also limit seaplanes. For most purposes both have internal combustion engines and fall into the same category. In the case of seaplanes, the aircraft generally produces somewhat higher single event noise levels than motorboats but these impacts last only seconds. The motorboat, however, often remains in the same area creating a continual disturbance over much longer periods. In this regard, we note with dismay that Alternative B places no limits on motorboat access, speed, horsepower, boat size or activity in the proposed restricted seaplane area. To limit seaplanes while allowing motorboats, without limitation, is unfair and discriminatory to seaplane access and is rarely justified when the impacts and merits of both forms of transportation are justly evaluated.

Our company recognizes that there is often value in identifying a special area within a park that offers a more tranquil and primitive experience. Traditionally, in parks across the nation and even in our own state, this need is often met by limiting certain areas to non-motorized craft. Our company and other seaplane advocacy groups would likely not comment if this were the case here but motorized boats **are** allowed in this alternative plan thus discriminating against seaplanes on the basis of perception-not facts or real historical impacts. Kenmore Air urges your office to re-evaluate this limitation with the result that seaplanes would have the same access as motorboats.

In summary, Kenmore Air is hopeful that the Park Service recognizes the longstanding history of unrestricted seaplane access to Ross Lake, the good record of these seaplane users and the unfair bias in limiting seaplanes where there is no restriction for boaters.

Thank you for this opportunity to comment and please do not hesitate to contact us should you have any questions regarding commercial historical use or technical questions regarding seaplane operations.

Sincerely,

Kenmore Air Harbor, Inc



Tim Brooks
Vice President, Flight Operations

LAW OFFICES OF

RONALD A. STEARNEY

11 WEST WACKER DRIVE

SUITE 500

CHICAGO, ILLINOIS 60606

TELEPHONE: (312) 456-6900

FAX: (312) 456-6902

September 17, 2010

Superintendent
North Cascades National Park Complex
810 State Route 20
Sedro-Woolley, Wa 98284

RE: Ross Lake Seaplane Closure

Dear Sir:

Having served as an elected representative in the Illinois House of Representatives, I learned there is no reason to amend statutes or regulations where no problem exists. Your agency proposes regulations that threaten access to Ross Lake.

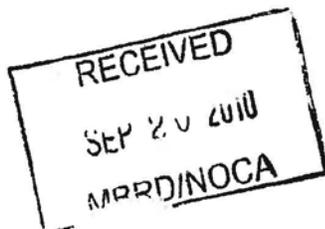
But I'm told there are no existing problems. Few noise complaints have been made. And those few complainants most like would complain about a 5hp outboard motor as well. Moreover, as seaplane use in the park has not been excessive, so noise cannot be a legitimate complaint.

And it smacks of unfairness to eliminate access to preferred campsites for seaplanes-and most unfair to discriminate in favor of power boaters. Since I am a taxpayer as well as other users of the park, I, too, should be accorded equal treatment.. There is room enough in this world for all of us to enjoy the amenities of the park. Accordingly, I support leaving intact the current regulations on seaplane access to Ross Lake.

As an aside, I might point out that amongst the reasons for the current hostility towards the federal government and congress is the excessive regulation by government agencies over every aspect of our lives.

Respectfully,

Ronald A. Stearney



PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 723

Author Information

Keep Private: No
Name: Loel Fenwick
Organization: Tanglefoot Seaplane Base
Organization Type: I - Unaffiliated Individual
Address: 100 Waterbird Landing, Coolin, ID 83821
Coolin, ID 83821
USA
E-mail: loelfenwick@gmail.com

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment in favor of unrestricted seaplane access to Ross Lake. I operate a public-use seaplane base on Priest Lake, Idaho. Based on 16 years of serving the seaplane community on an alpine lake that shares many of the features and issues of Ross Lake, I recommend that seaplane access to Ross Lake not be limited any more than it is by existing boating and FAA regulations. Seaplanes and the seaplane community are important assets to remote public resources such as Ross Lake. Seaplane access should be encouraged for the following reasons:

1. Seaplanes provide access to many who would otherwise not experience the scenic beauty, wildlife and recreational opportunities of remote protected areas. Most seaplanes carry not just a pilot, but also friends and family. Seaplanes bring access to children, the elderly and others whose ability to explore remote areas is limited.
2. People who make the significant training and financial investments necessary to fly seaplanes most often do so because of their passion and respect for remote places. These are amongst the strongest and most influential ambassadors encouraging support and protection for places like Ross Lake.
3. Seaplanes provide a vital link in case of emergencies such as fires, earthquakes and floods that can close down usual modes of transport and communication. Most seaplane pilots are highly experienced, and many have had, or still have, careers in the military, in airlines and in law enforcement. The seaplane community consists mainly of dedicated, responsible and mature citizens who serve important roles in search and rescue, disaster planning and who also assist in land and wildlife management. These operators represent a significant asset in planning for and managing emergency situations, and should be welcomed and integrated into management teams and plans.

I understand that few seaplanes visit Ross Lake. Many more may have landed and taken off without being noticed, which is usual. It is worth noting that at Priest Lake, almost all other lake users are well-disposed towards seaplanes, even with respect to landing in wilderness areas of the Priest Lake basin. The

Comment #636 - Tanglefoot Seaplane Base

Tanglefoot seaplane base on Priest Lake is visited by many boaters and others who enjoy the classic seaplanes, and seaplanes enjoy the support of the local government and environmental organizations because of our long history of cooperation and shared environmental concerns.

The US Forest Service has recognized the value of public access to remote landing areas for these and other reasons, and I earnestly recommend that continued seaplane access to Ross lake be facilitated and encouraged.

Yours sincerely,
Loel Fenwick, MD



September 29, 2010

North Cascades National Park
c/o Chip Jenkins
810 State Route 20
Sedro-Wooley, WA 98284-1239
noca_superintendent@nps.gov

Re: Washington Climbers Coalition and Access Fund Comments Regarding Ross Lake National Recreation Area General Management Plan

The Washington Climbers Coalition and the Access Fund

The Washington Climbers Coalition (WCC) and the Access Fund welcome the opportunity to provide comments on the preliminary alternatives for the Ross Lake National Recreation Area (NRA) General Management Plan (GMP). Please consider these comments when planning for climbing at the Ross Lake NRA and feel free to contact us anytime for assistance and information regarding established best management practices for climbing used on public and private lands throughout the country.

The Washington Climbers Coalition (WCC, www.washingtonclimbers.org) is a non-profit corporation focused on issues affecting rock climbing, ice climbing, and mountaineering in Washington State. The WCC is affiliated with the Access Fund (www.accessfund.org), a national climbing organization. The WCC's mission is to engage climbers and land managers in discussion of issues related to climbing area management and access, to encourage active involvement in coordinated efforts to preserve our crags and to maintain good relations with other recreational users and land managers or owners.

The Access Fund is a national advocacy organization whose mission is to keep climbing areas open and to conserve the climbing environment. A 501(c)(3) non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 10,000 members and affiliates. The Access Fund assists land management agencies around the country with climbing management issues. The Access Fund has an MOU with the National Park Service

(www.accessfund.org/mous) and Washington is one of the Access Fund's largest member states.

Climbing in the Ross Lake NRA

Since the early 20th Century, climbers have sought out the alpine challenges of the North Cascades, including those in what is now the Ross Lake NRA. More recently, climbers have discovered the excellent sport climbing the area offers. Many members of the WCC and Access Fund climb and live in Washington and have a direct interest in recreational access at the Ross Lake NRA. The Access Fund and WCC have a long history of cooperative assistance with the National Park Service (NPS) in the Ross Lake NRA. Prior to 2002, climbers began establishing rock climbing and bouldering routes in the Skagit Gorge. Due to concerns regarding bouldering in potentially sensitive areas and to give the NPS the opportunity to develop and implement a climbing management plan for the NRA, climbers agreed to a voluntary moratorium on establishing new climbing and bouldering routes in 2002. Climbers agreed to this voluntary moratorium with the understanding that a climbing management plan would be implemented within 2 years.

Since 2002, WCC and the Access Fund helped ensure climbers respected the moratorium, all the while working cooperatively with the NPS to negotiate an agreement that would allow new climbing in new areas while respecting the unique cultural and natural resources of the NRA. In 2008, we finalized the Newhalem Climbing Agreement (attached hereto) with the NPS to establish four areas in which new climbing routes could be established during the pendency of the current GMP. In addition, we hosted an Adopt-a-Crag event in conjunction with the NPS, Washington Trails Association, the Vertical World Junior Climbing Team, and The Wilderness Society to build a new trail to an established climbing area that enhances access and minimizes impact. We continue to communicate with the climbing community, other organizations and NPS personnel to explore cooperative ways in which the Access Fund and WCC can support our mission of climbing access and conservation at the Ross Lake NRA.

When considering the scope of the GMP, the NPS should consider how it could build further on the successful relationship that the agency has with the climbing community, in particular the WCC and the Access Fund, to ensure future access and conservation in the Ross Lake NRA. When considering the scope of the GMP, the NPS should also consider specific climbing provisions or even a stand-alone climbing management plan. The Access Fund is the leader in compiling climbing management plan information and documenting "climbing management practices that work." See our recent publication "Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan." The second edition of this 72-page booklet is available for free on our website at <http://www.accessfund.org/pdf/CM-web.pdf>. In addition, the Access Fund regularly hosts and organizes Climbing Management Summits that attract dozens of federal and state land managers from across the country, including one in October that a North Cascades National Park ranger will attend.

In designing the GMP, we encourage the NPS to strive to manage for the fact that the climbing in Ross Lake NRA provides the public with unique recreation opportunities, which should be preserved. For this reason the WCC and the Access Fund generally support

preliminary Alternative B because it appears to allow for future exploration and establishment of new routes and climbing areas beyond the four currently established areas.

From our review of the Ross Lake GMP Newsletter #3, Volume I, Chapter 4 of the Draft GMP/EIS and conversations with NPS personnel, we understand that Alternative B would automatically establish the existing four areas as “Climbing Management Areas” and would allow continued use and exploration of those areas as contemplated in the 2008 Newhalem Climbing Agreement. In addition, Alternative B allows for the possibility that future areas could be opened to sport climbing throughout the Ross Lake NRA.¹ The WCC, the Access Fund and all the climbers they represent are very excited about the potential to enjoy new sport climbing crags throughout this spectacular area.

We ask, however, that the NPS provide clarification with respect to the geographic scope and operational details of Alternative B. With respect to geographic scope, although the GMP addresses the Ross Lake NRA as a whole, Volume I, Chapter 4 of the Draft GMP/EIS specifically refers only to the Skagit Gorge in discussing sport climbing. It is our understanding and hope that this alternative includes the potential for establishing Climbing Management Areas in other zones throughout the NRA. As it appears from the NPS maps that some of the existing climbing areas are in zones other than that designated the “Skagit River Zone,” it appears that the GMP contemplates that “Climbing Management Areas” will not be restricted to the Skagit River Zone. Clarification on this point would help us explain to climbers in the future just which areas could potentially be explored for new climbing opportunities and would avoid misunderstandings about where new sport climbing areas will and will not be allowed.

With respect to the operational details, we seek clarification on the process for establishing new Climbing Management Areas. To whom would we address requests for review of potential new Climbing Management Areas? When could such reviews take place? How long would the approval process take? We are very aware of the budgetary limitations of the NPS and the many other duties of its personnel that could make it difficult to prioritize reviewing new proposals for climbing areas. We would like to establish a review process that would minimize the impact on NPS resources and facilitate speedy approval of suitable new areas. We would be happy to provide resources and expertise as needed to do just that.

It is the WCC’s and Access Fund’s experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions, including rerouting of trails or crag access advisories. The Access Fund’s grant program regularly provides funding for management initiatives that raise awareness about climber responsibilities and agency management obligations. Examples of conservation grants that the Access Fund regularly awards to maintain climbing access and preserve the climbing environment include:

- Boise Climbers Alliance, Black Cliffs, ID – cliff nesting raptor signage & brochure.
- Colorado Division of Wildlife, Boulder Canyon, CO – cliff nesting raptor signage.
- Joshua Tree National Park, CA – vegetation surveys, and GPS location of climbing areas

¹ Sport climbing is generally defined as rock climbing on cliff faces where fixed anchors, such as bolts, have been preplaced to enable climbers to more safely ascend rock faces that are not protectable with removable anchors.

Comment #889 - The Access Fund and Washington Climbers Coalition

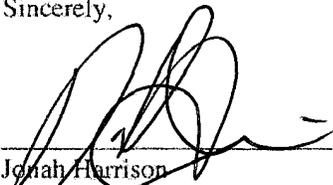
management obligations. Examples of conservation grants that the Access Fund regularly awards to maintain climbing access and preserve the climbing environment include:

- Boise Climbers Alliance, Black Cliffs, ID – cliff nesting raptor signage & brochure.
- Colorado Division of Wildlife, Boulder Canyon, CO – cliff nesting raptor signage.
- Joshua Tree National Park, CA – vegetation surveys, and GPS location of climbing areas in relation to Threatened & Endangered species sites.
- North Carolina Wildlife Resources Commission, NC – peregrine falcon monitoring and outreach.

The Access Fund and the climbing community have an exemplary record with regard to supporting natural resource protection. In general, climbers are strong supporters of open space and conservation, have a vested interest in protecting the environment, and understand the balance between conservation and access. When formalizing the GMP alternatives at Ross Lake NRA, the WCC and the Access Fund urge the NPS to reaffirm the positive role that climbing has traditionally had at the NRA, to ensure that current climbing access and the climbing opportunities are maintained intact and that future opportunities for new Climbing Management Areas are prioritized.

If you have any questions or concerns please feel free to contact either representative below.

Sincerely,



Jonah Harrison
Regional Coordinator of the Access Fund
719 Second Avenue, Suite 700
Seattle, Washington 98104
(206) 792-5231



Matt Perkins
Secretary, Washington Climbers Coalition
P.O. Box 77315
Seattle, WA 98177
(206) 389-3404

WCC & ACCESS FUND COMMENT ON ROSS LAKE NRA GMP - 4



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

August 26, 2010

Superintendent, attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 90284

SEP 13 REC'D #283

PRC #13 ✓ ank

Re: Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement

Dear Superintendent Jenkins:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 410,000 members, more than two-thirds of the nation's pilots – including 12,061 of our members in the state of Washington. On behalf of our membership, AOPA is committed to ensuring the future viability of and general aviation access to our public lands and waters. To that end we submit the following comments on the *Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement (GMP/EIS)*.

AOPA is opposed to the preferred alternative, Alternative B, because it severely limits seaplane access to the Lake by restricting seaplane activity to the extreme northern and southern reaches of Ross Lake. Anecdotal evidence provided to us by pilots who use the lake as well as NPS staff is that seaplane usage occurs on the average of 12 to 24 operations per year and that there is no history of complaints about seaplanes. Seaplane use of the recreational area has never been excessive and there is no data indicating a significant increase in use is likely over the life of the new management plan.

One of the consequences of limiting seaplanes to the north and south ends of the lake is the denial of access to seaplane friendly campsites. The best suited campsites are those with a north facing dock that protects the aircraft from the southerly swells on the lake. By not allowing seaplanes access to the central portion of the lake the number of campsites with north facing docks is dramatically reduced.

Seaplane pilots and visitors to the national parks recognize the need for all users to enjoy their experiences. Normal operating procedures for seaplane pilots include flying friendly to avoid creating disturbances by reducing power settings after takeoff, minimizing over flights and keeping a sharp lookout for other vessels and people on the water. These flying friendly procedures are also known as noise abatement procedures and are a voluntary way of ensuring that other visitors to the NRA are not excessively bothered by the sounds of normal seaplane operations. Seaplane pilots as well as land plane pilots overflying Ross Lake are asked to remain at least 2,000 above ground level while overflying charted National Park Service areas in accordance with FAA Advisory Circular 91-36, *Visual Flight Rules (VFR) Flight Near Noise-Sensitive Areas*. Incorporating these procedures in to the seaplane access policy would be acceptable and AOPA is willing to assist the NPS in working with other stakeholders to help craft sensible procedures.

Superintendent, attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
Page 2
August 26, 2010

Normal seaplane operations while in the approach, landing and taxiing phases are made at very low power settings and do not generate a significant amount of sound. In fact, the phase of flight that generates the most amount of sound is during takeoff and studies show that the sound levels exceed the federally accepted residential noise threshold of 65 dBA day-night average sound level (Ldn) for less than 60 seconds. By that measure, Alternative B would restrict seaplane access to the lake because of less than half an hour of noise over the course of an entire year.

Even as NPS contemplates limiting seaplane access, we note that motorboats are currently allowed in both the front country and back country management zones according to Table 4-1 of the draft GMP/EIS. We suggest that since seaplanes operate on or near the water in a specific manner and for much shorter periods of time than motorboats, seaplanes should enjoy the same access as motorboats do under the preferred alternative. AOPA respectfully requests that change to the preferred alternative so that current seaplane access is maintained.

In summary, AOPA supports continuing the current access seaplanes have to Ross Lake and respectfully requests that the limitations on seaplane access contained in the preferred alternative be removed as they are the equivalent of swatting at a mosquito with a sledge hammer.

Thank you for the opportunity to provide comments on the draft general management plan and environmental impact statement. If we can be of further assistance please contact us at 301-695-2200.

Sincerely,



Gregory Pecoraro
Vice President
Airports and State Advocacy

American Rivers * American Whitewater * Washington Wilderness Coalition

September 30, 2010

Palmer (Chip) Jenkins, Superintendent

North Cascades National Park Service Complex

810 State Route 20

Sedro Woolley, WA 98284---1239

RE: Ross Lake National Recreation Area General Management Plan

Dear Superintendent Jenkins:

On behalf of American Rivers, American Whitewater, and Washington Wilderness Coalition we are writing to provide our input on the Skagit Wild and Scenic River Eligibility and Suitability Studies as part of the Ross Lake National Recreation Area General Management Plan (GMP). We wish to express our appreciation for all the work you and your staff have invested in this planning effort to date and thank you for following through on your commitment to conduct a suitability evaluation of the Skagit River and the two tributaries Goodell Creek and Newhalem Creek.

We strongly support the conclusions reached in the suitability analysis recommending the Skagit River from the Gorge powerhouse to the National Recreation Area (NRA) boundary and its two major tributaries Goodell Creek and Newhalem Creek for inclusion in the national Wild and Scenic Rivers system. The analysis included a complete review of outstandingly remarkable values and we concur with the conclusions reached that are summarized in Table 1. These river segments are exceptional regional and nationally significant resources that deserve permanent protection that will protect their free-flowing character, outstanding resource and recreational values, and water quality.

While we understand that available resources did not permit an evaluation of all Skagit River tributaries within the North Cascades National Park Service Complex we appreciate the fact that previous findings for these river segments are incorporated into the GMP. Notably, these findings are summarized in graphic form as figure 2, a map illustrating all the river segments within the North Cascades National Park Service Complex. We thank you for considering our request for specific direction in the GMP to conduct an updated eligibility analysis and suitability analysis for these other rivers in the future. The specific direction to work with the U.S. Forest Service to update the Wild and Scenic Rivers analysis for these tributaries over the life of the GMP is an approach we support.

The Skagit River is clearly a superlative natural feature of the North Cascades National Park, which is unique for the diversity of opportunities for enjoying and exploring wild free-flowing rivers in the conterminous United States. We thank you and your staff for the completeness of your review and offer our strongest support for the conclusions you reached to recommend designation of the Skagit River and its two tributaries Goodell Creek and Newhalem Creek under the Wild and Scenic Rivers Act.

Sincerely,
Brett Swift
Northwest Regional Director
American Rivers

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater

Nalani M. Askov
Executive Director
Washington Wilderness Coalition

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 691

Author Information

Keep Private: No
Name: Greg Herrick
Organization: Aviation Foundation of America, Inc
Organization Type: I - Unaffiliated Individual
Address: 121 5th Avenue NW
New Brighton, MN 55112
Ross Lake National Recreation Area, MN 98284
USA
E-mail: gherrick@aviationfoundation.org

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 08/24/2010 Date Received: 08/24/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

There should be no changes made to seaplane access in the Ross Lake National Recreation Area. Seaplane access in completely within the definition of what National Recreation Areas are intended to be.

According to the FEDERAL EXECUTIVE BRANCH POLICY GOVERNING THE SELECTION, ESTABLISHMENT, AND ADMINISTRATION OF NATIONAL RECREATION AREAS BY THE RECREATION ADVISORY COUNCIL, the criteria for becoming a National Recreation Area include the following requirements:

1. National Recreation Areas should be spacious areas?
2. National Recreation Areas should be located and designed to achieve a comparatively high recreation carrying capacity, in relation to type of recreation primarily to be served?
3. National Recreation Areas should provide recreation opportunities significant enough to assure interstate patronage within the region of service, and to a limited extent should attract patronage from outside of the normal service region.
4. The scale of investment, development, and operational responsibility should be sufficiently high to require either direct Federal involvement, or substantial Federal participation to assure optimum public benefit.
5. Although nonurban in character, National Recreation Areas should nevertheless be strategically located

within easy driving distance, i.e., not more than 250 miles from urban population centers which are to be served. Such areas should be readily accessible at all times, for all-purpose recreational use.

6. Within National Recreation Areas, outdoor recreation shall be recognized as the dominant or primary resource management purpose. If additional natural resource utilization is carried on, such additional use shall be compatible with fulfilling the recreation mission, and none will be carried on that is significantly detrimental to it.

To restrict seaplane access is clearly opposite of the stated intent of National Recreation Areas in general, and specifically as defined in NRA Criteria #5 above which states that any NRA "should be readily accessible at all times, for all-purpose recreational use."

Seaplanes provide visitors a perspective which engenders a deep respect for the natural appearance of area. They require little infrastructure and are an integral and well accepted part of the region's transportation tradition and history.

To suggest that seaplanes are some how less desirable than motor boats, jet-skis, ski boats and the like is preposterous. Seaplane operations are limited in duration, and only the hulls of the floats make contact with the lake. All other motorized vehicles on the lake are in constant contact with the water, and require physical intake and outflow of lake water to remain operational. They are frequently refueled lakeside, or on the lake. It is not at all unusual to see telltale evidence of fuel and oil spills found adjacent to them. This is not the case with seaplanes.

As well, seaplane operations are, by their very nature, limited in duration. Motorized watercraft, on the other hand are operating their motors when ever they are in motion.

Then there is the question of alcohol and alcohol related accidents and incidents. Pilots are required by law not to consume any alcohol within eight hours of operating their aircraft. Boaters are not so constrained. Unfortunately and by contrast, Washington State holds the unenviable state ranking of #12 in the category of "Number of Alcohol Related Injuries in Recreational Boating Accidents" and is #15 in the per capita rankings.

Seaplanes should be allowed full and unfettered access to any and all areas of the Ross Lake National Recreation Area, consistent with access provided to motorized watercraft. Ross Lake is not a Wilderness Area ? it is a National Recreation Area. It should continue to be treated as such in accordance to the original intentions of its designation.

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 727

Author Information

Keep Private: No
Name: Aron Faegre
Organization: Columbia Seaplane Pilots Association
Organization Type: I - Unaffiliated Individual
Address: 13200 Fielding Road
Lake Oswego, Oregon 97034
Lake Oswego, OR 97034
USA
E-mail: faegre@earthlink.net

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear Sirs:

Seaplanes provide an important, unique mode of travel throughout North America, especially in the western states and in Canada. They are particularly useful in providing direct transportation to remote areas, while reducing the carbon footprint inherent in highway vehicles ? which as surface transportation they produce due to longer travel distances and the need for massive oil, tar, and steel based road and bridge infrastructure. Seaplanes simply use existing water bodies for their infrastructure, and carry all of their required equipment and facilities within their vehicle, similar to that of canoes and kayaks.

It is for this reason that we proudly point out that: "Only seaplanes and canoes can visit the wilderness and leave no trace."

Columbia Seaplane Pilots Association is a non-profit organization dedicated to the protecting of seaplane access rights. We have approximately 350 members in Oregon, Washington, Idaho, and Montana. We focus our interest on land within the Columbia River watershed, but comment on other watersheds since we fly between states and internationally.

We must insist that seaplane use of all of Ross Lake be retained as a matter of basic infrastructure need for seaplanes when traveling on interstate and international flights. Our pilots' seaplanes follow the pathways of rivers and lakes, as that creates safety of operations and allows for stopping while traveling as needed due to nightfall, weather, or just overnight recreational camping. Under the Commerce Clause in the U.S. Constitution, Section 9, we believe seaplanes that are traveling from Oregon and through Washington are protected with a right of access to Ross Lake for those travel purposes.

We will be the first to state that we recognize seaplane pilots must be responsible in using this access. Therefore we believe strongly in noise abatement rules, noise abatement procedures, and noise abatement training to minimize noise impacts to other users. I'm sure others have commented to you on this subject. We would be pleased to participate in the development of such procedures for Ross Lake, and will work actively and strongly to get future noise abatement rules and procedures to our members.

When seaplanes are used as "vehicles of arrival" on Ross Lake, the seaplane landing or takeoff occurs as an event of one to two minutes. After arrival and taxiing (which is at idle power or with paddles) to shore, the tents and other camping gear are unloaded, and the pilot and passengers are there specifically to enjoy the near wilderness setting. The seaplane makes no further noise. We understand that there is currently a low volume of usage by seaplanes, and firmly believe that the total impacts of the seaplanes at Ross Lake is miniscule when compared to other vehicles that are more common.

In conclusion, we must with all due respect, request that the final plan continue to allow our seaplanes access to the entirety of Ross Lake.

Thank you for the opportunity to provide comment for your plan.

Respectfully,

Columbia Seaplane Pilots Association

Aron Faegre, President

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 686

Author Information

Keep Private: No
Name: Marc R. Rodstein
Organization: Lake Amphibian Flyers Club
Organization Type: I - Unaffiliated Individual
Address: 15695 Boeing Court
Wellington, FL 33414
USA
E-mail: spm2@lakeflyers.com

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 08/31/2010 Date Received: 08/31/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I would like to comment in opposition to restrictions on seaplane activities on Ross Lake. It is hard to see any justification for this, especially given the extremely low level of seaplane activity on Ross Lake, both present and forecast. Where is the harm in allowing seaplanes to access the lake on an average of once or twice a month in total? I have been to other NRA areas (Lake Powell and Lake Mead) with my seaplane, and there is no problem in these areas with seaplane operations, even though the frequency of seaplane operations there is many times that of Ross Lake, as is the number of persons, boats etc. using the lakes involved.

Please, don't shut seaplanes out of Ross Lake for no good reason.

Marc Rodstein
Executive Director
Lake Amphibian Flyers Club

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 138

Author Information

Keep Private: No
Name: Jennie S. Goldberg
Organization: The League of Northwest Whitewater Racers
Organization Type: I - Unaffiliated Individual
Address: 3048 62nd Avenue SW
Seattle, WA 98116
USA
E-mail: jennie@nwwhitewater.org

Correspondence Information

Status: Reviewed Park Correspondence Log: 692
Date Sent: 09/19/2010 Date Received: 09/19/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Skagit River from below Gorge Dam to Bacon Creek is very important to whitewater paddlers as a recreational resource. It provides an excellent training site for introducing paddlers to racing and for training camps for members of the US whitewater team. The scenery, the good flows that provide a challenge but are still safe for boats, the easy access and the supporting outdoor facilities (campgrounds) has made this site one of the best locations in the United State for national level races. We strongly support the Park Service recommendations to protect the Skagit River in the Ross Lake Natural Recreational Area and it's two major tributaries, Goodell Creek and Newhalem Creek, with Wild and Scenic designation.

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 762

Author Information

Keep Private: No
Name: David E. Bartholome
Organization: Montana Seaplane Pilots Association
Organization Type: I - Unaffiliated Individual
Address:
Ronan, MT 59864
USA
E-mail: dbarthol@npgcable.com

Correspondence Information

Status: Reviewed Park Correspondence Log: 1028
Date Sent: 09/13/2010 Date Received: 09/13/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

To whom it may concern,

As president of the Montana Seaplane Pilots Association I am writing to comment on the proposed management plan for the Ross Lake recreational area.

My first comment is the question WHY is this management plan necessary and why would seaplanes be excluded or restricted in any way? I'm sure it is important to reassess management plans from time to time, however there is no legitimate reason to restrict seaplane access in any form. These planes have been flown into Ross Lake for decades with no history of any complaints. As I'm sure you have been informed, seaplane operations and pilots are already subject to strict Federal Aviation Regulations and should not face any more from a government agency that is supposed to act in the best interest of ALL citizens.

Furthermore, on the subject of pollution, seaplanes in no way come close to the amount of noise, smell and oil/gas leakage left by motor boats and jet skis. Airplanes leave a very short and comparatively low noise footprint in the take off area. Seaplanes serve an important role in the commerce of the United States by delivering goods and people to remote areas of the country. It serves no purpose to restrict seaplane operations that have benefited those who recreate with them and those that provide legitimate services with them.

I urge you to not impose seaplane restrictions on Ross Lake and consider the fairness to all American tax payers who use this beautiful area.

Vienna 11/20/10

#4

Ross Lake National Recreation Area

General Management Plan
Newsletter #3: Draft GMP/EIS Executive Summary
July 2010



COMMENT FORM

PERC #825

Janik

Please Provide Your Comments by September 30, 2010

The NPS invites you to share your comments and concerns regarding the Ross Lake NRA Draft General Management Plan and environmental impact statement (GMP/EIS). By providing your comments, you can help make the final plan a better plan to guide the future of Ross Lake NRA.

The draft GMP/EIS contains four distinct alternatives for the future management of Ross Lake NRA. The draft GMP/EIS identifies Alternative B as preferred by the NPS. Please tell us if you agree with the preferred alternative, prefer another alternative, or elements of any of the alternatives. You may also provide comments on all sections and elements of the draft GMP/EIS.

We hope that you take the time to read and comment on the draft GMP/EIS. Your input is important to us.

1. Excellent presentation
2. Support Alt. B
3. Continue operation & maintenance of Desolation Lookout
4. Keep boundaries as is

You may use the space at the back of this form or a separate sheet of paper to share other thoughts or ideas. ⇨

- I would like to be placed on the e-mail list for the general management planning effort.
- I would like to be placed on the mailing list for the general management planning effort.
- I would like to be taken off the mailing list.
- The address you have is incorrect. Please change it to the following:

Name: Keith Angow, Nat'l Historic Lookout Regis.
 Email (required for email list only): _____
 Address: 374 Maple Ave E, Ste 310
 City, State, Zip: Vienna VA 22180

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.



PCPC # 411
National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

September 29, 2010

Chip Jenkins
National Park Service
Pacific West Region – Planning Division
909 First Ave., Suite 500
Seattle, WA 98104-9882

SEP 30 2010

Re: Ross Lake National Recreation Area Draft GMP/EIS Comments

Dear Superintendent Jenkins:

On behalf of the National Parks Conservation Association (NPCA) and our more than 340,000 members nationwide, I respectfully submit the following comments on the Ross Lake National Recreation Area Draft GMP/EIS.

NPCA supports the focus of the GMP to meet the intent of the Organic Act by providing enhanced visitor opportunities while ensuring the long-term stewardship of the North Cascades ecosystem and wilderness. As such, we support Alternative B, the preferred alternative and environmentally preferred alternative, but with some modifications.

Boundary Adjustment

The most significant modification is our request to include a boundary adjustment that will bring North Cascades National Park closer to park visitors. Highway 20 is the major route through the heart of the North Cascades Complex but, as we know, it is all within the Ross Lake NRA and the park can only be seen through the windshield. We strongly urge the Park Service to adjust the boundary of Ross Lake to include much of the Highway 20 corridor, including the areas identified as Frontcountry Zone, Backcountry Zone, Wilderness Zone, and Skagit River Zone in the national park. The Hydroelectric Zone would remain part of the Ross Lake NRA.

Visitors come to the greater North Cascades Ecoregion because of its wildlife and natural wonders and for the area's recreational opportunities, including its visitor center, trails and campgrounds. Sustaining and protecting these important recreation and natural values while also working to increase that visitation is critical to a sustainable and healthy local economy and environment. We feel that redrawing the boundaries of the Ross Lake NRA to provide the opportunity for highway visitors to actually be within the North Cascades National Park proper will likely increase visitation and it is a low cost way of improving the visitors' experience. Also, this will provide for better protection of natural and cultural wonders.

Northwest Regional Office
313-A First Avenue, South • Seattle, WA 98104
206.903.1444 • Fax 206.903.1448 • nwro@npca.org • www.npca.org/northwest

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We request that this boundary adjustment be included in the Final GMP/EIS. A map of NPCA's request is attached to these comments.

NPCA has additional comments and suggestions for modifying the preferred alternative on these following issues:

Grizzly Bear "Core Habitat Area" Management

NPCA supports the return of healthy grizzly bear populations in the North Cascades either through natural migration or augmentation of the current bear population within the park complex. While augmentation is not addressed in the GMP, NPCA does support the National Park Services' (NPS) decision to provide a minimum Core Habitat Area of 70% for grizzly bears within each Ross Lake Bear Management Unit (BMU). According to bear management practices in Montana and Wyoming, a Core Habitat rating of 70% is required to assure viable bear populations. This core habitat rating would also allow for additional facility development such as new trails, trailheads, or backcountry campgrounds. In considering new facilities, NPCA encourages NPS to engage all stakeholders in developing these opportunities so that bear habitat and opportunities for increased bear populations are maximized while still providing for increased access for park users.

Management Zones

NPCA supports the draft plan's creation of 5 management zones to prescribe the intended purpose and guide the implementing management of each area of the NRA. As described above, while removed from consideration in the alternatives, NPCA supports transfer of the Highway 20 corridor to the national park proper, except for those areas required by Seattle City Light and the Federal Energy Regulatory Commission (FERC) for electricity transmission. Specifically, NPCA supports the transfer of management zones identified as the Frontcountry Zone, Backcountry Zone, Wilderness Zone, and Skagit River Zone to the national park. The Hydroelectric Zone would remain part of the Ross Lake NRA. Please see the attached map illustrating this recommendation.

North Cascades Highway Corridor

NPCA strongly supports the effort in Alternative B to "create a distinct sense of arrival to help visitors understand they have entered a unit of the National Park Service" when travelling through the NRA on Highway 20. This sense of arriving at a national park is the very reason for our boundary adjustment recommendation. Redesigned, constructed, and better maintained entrances that contain interpretive displays that are modeled more closely after traditional park entrances found at Mount Rainier National Park or Olympic National Park (although entrance fee stations are not appropriate on a state highway) would let visitors know they are in the North Cascades Complex. Furthermore, increased usage of the Park Service arrowhead on signs and

facilities would remind visitors they are within a unit of the National Park System. Working with Federal and State transportation departments to increase the number of park signs along Interstate 5 and State Highways 20, 153, and 530 would also increase the visibility of the Complex in the region and attract visitors. Additional services along the Highway Corridor, such as enhanced vehicle pullouts, are also supported by NPCA.

Newhalem

One of the most important changes in the NRA that NPCA supports is replacement of the single lane access bridge across the Skagit River to the North Cascades Visitor Center to accommodate tour busses and recreational vehicles. The Visitor Center is not easily accessible in the first place, requiring a short drive from Highway 20, and is not easily accessible for tour busses, whose visitation to the visitor center has declined over the years. The problem of accessibility is only compounded by the single lane bridge and stoplights at each end of the bridge which allow only one direction of traffic at a time. Along with enhanced signage, replacing this bridge with two lane access and removal of the stoplights would greatly increase the ease and likelihood of visitor utilization of the visitor center. While we understand that there are sensitive Native American resources near the bridge, we encourage the NPS to develop a sensible plan that both preserves important cultural resources and improves access to the visitor center.

Another needed improvement is making directions to the visitor center clearer once visitors cross the bridge. Many visitors are confused by the presence of the camp tender building that appears immediately after crossing the bridge and mistakenly believe it is the visitor center. Accordingly, visitors believe that the visitor center is closed or altogether give up on finding the visitor center. As such, any improvements to the bridge should also include improved signage that clearly leads to the visitor center.

In many national parks, the first stop of most visitors is the visitor center. Making the visitor center more accessible will lead to a dramatic increase in the number of visitors to the visitor center, as well an increased public understanding of the Complex's outstanding natural and cultural resources that make it so special.

Diablo Townsite

NPCA supports the land exchange and/or acquisition proposed by the NPS with Seattle City Light at the Diablo Townsite, in which the NPS would obtain the Hollywood area. The Hollywood area provides access to the Stetattle Creek and Sourdough Mountain trailheads. Management by the NPS would ensure appropriate access to these popular trails. This exchange would allow each agency to manage the area it is best suited to administer.

Hozomeen

NPCA supports rehabilitation and reorganization of the Hozomeen campground to allow for a more organized and traditional campground experience. Furthermore, NPCA also supports the construction of a new ranger station/orientation center that would be jointly used in partnership with British Columbia parks. Working cooperatively with Canadian agencies in all areas of park protection is an important aspect of the GMP.

Marblemount Ranger Station

NPCA supports the option presented in Alternative D of moving the Marblemount Wilderness Information Center to a location in the town of Marblemount on the North Cascades Highway. While improved signage has made the Wilderness Information Center easier to find, it is still difficult to access and not easily visible. Just as enhanced entrances to the park would help visitors realize they are in a unit of the park system, a more visible Wilderness Information Center would allow visitor to obtain information before even entering the park.

NPCA also supports Alternative D's inclusion of construction of permanent group housing to provide approximately 20-30 additional bed spaces, particularly for seasonal rangers. Currently, finding housing for employees can be difficult during the summer season.

Air Quality

NPCA supports pursuit of redesignation of the Class II Airshed within Ross Lake NRA to a Class I Airshed. While redesignation is very difficult to obtain, it would provide more stringent protection from some pollution sources.

Wildlife

NPCA strongly supports continuing the effort to restore endangered species to the Complex, including grizzly bears and gray wolves. Working to minimize the possibility of negative wildlife-human interactions through improved food storage methods will help the restoration of these and other important species to the entire Complex.

Boating

NPCA supports the encouragement of self-propelled and non-mechanized recreation in the NRA as well as the prohibition of water skiing. NPCA believes that the exclusive use of four-stroke engines should be required sooner than 2015 since these engines are easily accessible on today's market and significantly reduce water pollution from the inefficient two-stroke. NPCA supports the use of four stroke engines but is concerned that use of direct-injection two stroke engines could allow significant pollution of Ross Lake to continue. The elimination of more polluting motors would help in the effort to redesignate the NRA Airshed from Class II to Class I.

Sport Climbing

NPCA supports the establishment of "Climbing Management Areas" as long as there is significant input from and dialogue with stakeholders and the general public when designating these areas. Sport climbing is a popular sport and excessive limitations on climbing opportunities within the NRA may result in the loss of strong park supporters.

Seaplanes

NPCA supports Alternative B due to the noise and pollution caused by these planes that is not compatible with the backcountry character of the NRA. If the park intends to emphasize the use of self-propelled and non-motorized recreation of the lake, the presence of seaplanes in all areas of the lake will not aid this effort.

However, if this approach is unfeasible, NPCA would support maintaining seaplane use at current levels and instituting a permit system to limit the number of landings. NPCA would also support landing sites limited to areas near floatplane accessible campsites.

Backcountry Permit System

NPCA strongly supports changing the current permit system. Instituting a system which makes obtaining a permit easier will help those people who wish to experience areas of the park not accessible through Marblemount, such as parkland accessible from the Baker Lake Road. Also, providing the option of advance trip planning will likely result in more backcountry use as non-local visitors can be expected to use the service. Furthermore, advance reservation of permits for seaplane access should be required if seaplane use is limited as recommended above.

Management of the North Cascades Highway

NPCA supports the NPS recommending nomination and designation of the North Cascades Highway as a National Scenic Byway. The sightseeing opportunities of this highway are superb and should be protected by National Scenic Byway designation.

Climate Change

NPCA supports efforts by the NPS at the NRA to address climate change and reduction of the NRA's carbon footprint through emission reductions, use of green energy, use of hybrid transmissions, photovoltaic systems, and biodegradable fuels and oils.

International Park Designation

Finally, NPCA supports the idea of an International Park designation between the North Cascades National Park Complex and one or more of the British Columbia provincial parks. This would solidify cooperation and transboundary management of the North Cascades ecosystem. Also, this could lead to greater recognition of this area and its natural and cultural resources, similar to the success of the Crown of the Continent project in Montana. NPCA is looking into the possibility of this designation.

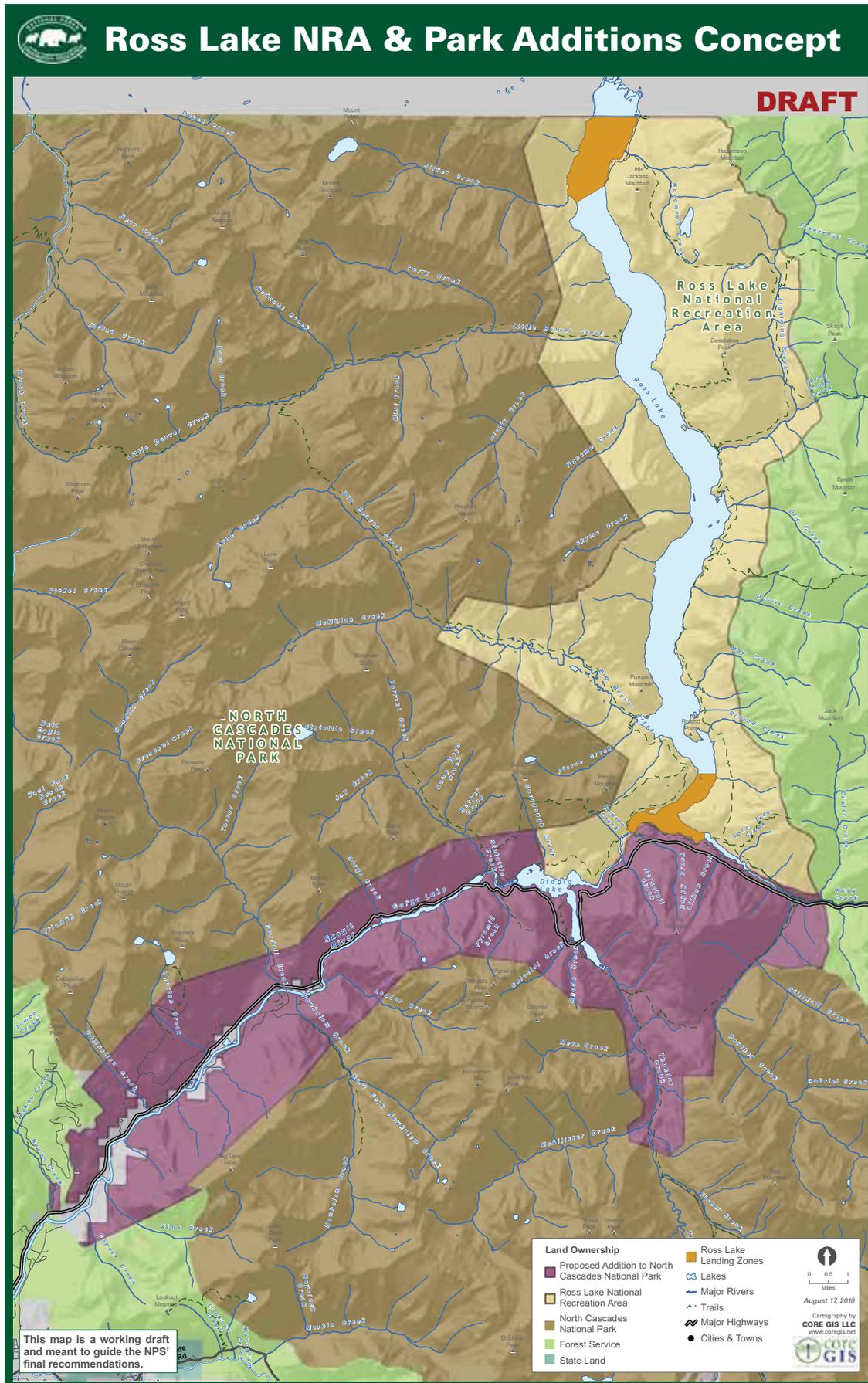
Thank you for considering these comments and we look forward to receiving the Final GMP/EIS.

Sincerely,



Sean Smith
Northwest Policy Director
National Parks Conservation Association
Protecting Our National Parks for Future Generations
313-A 1st Ave S
Seattle, WA 98104
PH: 206-903-1444, x205
Cell: 206-462-0821
FX: 206-903-1448
ssmith@npca.org
www.npca.org

encl: Proposed boundary adjustment map



PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 577

Author Information

Keep Private: No
Name: David L. Fluharty
Organization: North Cascades Conservation Council
Organization Type: I - Unaffiliated Individual
Address: 3621 NW 64th St
Seattle, Washington 98107
Seattle, WA 98107
USA
E-mail: fluberg@msn.com

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Chip Jenkins, Superintendent
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284-1239 September 30, 2010

Thank you for this opportunity to comment on the General Management plan review for the Ross Lake National Recreation Area. It is clear that much thought and hard work has gone into preparation of the RLNRA GMP/EIS document. We support many of the initiatives that are proposed in the management plan review, but have reservations about others. Specifically, we support Alternative B, with some modifications and additions from Alternative D. Following are specific comments on each of the alternatives. In addition, NCCC raises the issue of RLNRA boundary changes to better protect the North Cascades NPS Complex and to achieve management on an ecosystem basis. At a minimum, the Final RLNRA GMP EIS should acknowledge the lack of ecosystem-based boundaries and assess the continuing impacts on Park resources and management.

General Comments Regarding All Alternatives

The North Cascades Conservation Council (N3C) supports conversion of portions of the Thunder Creek watershed to wilderness. The wild and pristine nature of this area certainly justifies its designation as wilderness.

N3C also supports full protection of grizzly bear recovery core areas in the RLNRA. We believe that new roads should not be constructed in the RLNRA and that existing and future trails should be located (or relocated) to avoid core grizzly bear habitat. One proposal that should be carefully assessed in this respect is the proposed feasibility study for a connection trail between Centennia/Skyline II Trail Junction with the East Bank Trail at Hozomeen.

N3C also strongly supports inclusion of the Skagit River (Gorge Powerhouse to the RLNRA boundary), Goodell Creek, and Newhalem Creek in the US Wild and Scenic River System. Designation of the Skagit River for its "recreation" values and Goodell and Newhalem Creeks for their "wild" values seems appropriate.

We were substantially disappointed to find that Thunder, Fisher, Ruby, and Big Beaver Creeks were not included in the Wild and Scenic River System under this management plan review. These streams certainly have the wild and scenic characteristics that should qualify them for designation and Wild and Scenic Rivers.

Comments on Alternative A

N3C believes that the No-Action alternative is not appropriate for the RLNRA Management Plan review. Increased knowledge and changes on the ground have created new opportunities as well as responsibilities for modified management of the RLNRA.

We were especially concerned about provisions that allow continued hunting in the "natural zone" within the RLNRA. Hunting is not compatible with the management goal for the "natural zone" which states that the area should "remain unaltered by human activity." Clearly, hunting will substantially alter wildlife populations in the "natural zone."

Comments on Alternative B

N3C supports the selection of Alternative B, with a few modifications as discussed below.

We believe that the existing reservation system for recreation in the North Cascades National Park Complex is cumbersome and discourages park use. We support creation of an on-line reservation system for all areas of the RLNRA (and the North Cascades National Park). However, to discourage spurious reservations, it would be good if the system required a confirmation within two days before use and that a portion of the recreation sites be set aside for on-site reservation.

N3C opposes all motorized recreation on Ross Lake. We support maximum protection for soundscapes in the RLNRA and the park as a whole. Concomitantly, we urge that where feasible, that lights be shielded or placed so that they are not visible from the side or above at long distances. Protecting the night sky is a Wilderness value. The proposed inventory and subsequent efforts to mitigate impacts is the right direction for management.

We specifically oppose the use of Ross Lake for float plane landings. We would also like to see bans on all forms of motorboat use and water skiing on Ross Lake. Float plane and motor boat use are wholly incompatible with and substantially compromise backcountry and wilderness experiences in the RLNRA. We understand the need for limited administrative use of motorized boats by Seattle City Light and by the National Park Service. One either existing or potential use of watercraft is not explicitly addressed. This is

the live aboard "Waterbagoes" that occupy many reservoirs in the Southwest. It may be impractical to transport and use such craft on Ross Lake but it may not stop people from trying. Such use would certainly be incompatible with the management objectives set out. NCCC would like to see this use strictly limited if permitted at all when . It is not clear to NCCC what would control the introduction of an additional water taxi service on Ross Lake ? it seems to be folded in with the concession contract and operational plan. If that is true, then it would be helpful to have stronger indications of how the service would be operated and how it would affect the Ross Lake experience in the Draft EIS.

In summary re: boating on Ross Lake , the vagueness of management controls, e.g., control number of boats by maintaining the existing capacity of boating infrastructure/ NPS would establish horsepower, boat size , an/or speed limits, etc. is disconcerting as these are the kinds of details that need to be addressed in a General Management Plan. NCCC is generally in support of the directions proposed but we would have liked to see more detail. Will these details be addressed in future Management Plans?

N3C supports an upgrade of recreation amenities, especially for youth and families, along the highway corridor. Creating opportunities for youth recreation should be one of the most important goals of the RLNRA. This upgrade should include much more visible entry portals on the east and west ends of the RLNRA, a new visitor center in Marblemount, reasonable signage to direct visitors to amenities, several new front-country trails (Goodell Creek landslide, Happy Creek falls, and Stetattle Creek spur trail), and additional campground sites.

N3C is strongly opposed to investing \$6,100,000 in construction of a new two-lane bridge to reach the existing visitor center behind the Newhalem campground. These funds could much better be spent creating a new visitor center in Marblemount. As you are aware, N3C opposed the siting of the Newhalem Visitor center precisely because of its lack of access and the difficulty of maintaining year round access not to mention the environmental impacts of road building and construction. Instead of trying to overcome these obstacles, the Newhalem Visitor Center should be phased out and the site restored.

The more visible and accessible visitor center in Marblemount would be used by far more visitors and would provide far more opportunity for educating North Cascades visitors on the recreation amenities and conservation values of the North Cascades. Placement of the visitor center in Marblemount would also create the potential for public-private partnerships that could substantially improve the economies of Marblemount and other gateway communities in the Skagit Valley.

At Hozomeen it is important to maintain the National Park character of the site. It is a remote an beautiful site but threatens to become a variously named "Winnebago flat/Volkswagon Flat" Signage should reflect the actual names given to the area and efforts should continue to be made to keep the use and design consistent with the best the NPS can offer. Present direction from the GMP DEIS is "The campground at Hozomeen would be rehabilitated and provide a more organized and traditional campground experience." NCCC strongly supports this direction. In addition, NCCC encourages the NPS to continue to advise its Canadian counterparts to not pave the road as this will definitely change the nature of the visitor experience.

The proposals to expand safety zones around trails and provide education on the presence of hunters are wholly inadequate for protecting RLNRA visitors from hunting accidents. Given the desired and expected increase in family-friendly recreation in the RLNRA, hunting should be banned in all areas of the RLNRA.

Specific reference is made with respect to potential land exchange or other arrangements in the Diablo

Townsite, e.g., Hollywood/Reflector Bar. NCCC supports continued negotiations to determine if alterations in ownership and management are appropriate. If necessary, NCCC would be willing to consider support for legislation making these changes. However, of prime consideration would be maintaining and improving the possibility of public access to Diablo Lake shoreline in the Reflector Bar area consistent with public safety. This perspective differs from the "separation of use" goal outlined in the document. It appears to NCCC that the administration and maintenance facilities are concentrated away from the shoreline. Public access is severely limited by the placement of the road except for at Gorge CG.

The statement that "The Washington State Department of Fish and Wildlife would continue to regulate fishing (or hunting) in Ross Lake NRA" (p. 95) implies that the NPS does not have any role in fish management (or hunting except ensuring public safety). This is contrary to what we understand to be the case at present. NPS has a significant role to ensure non-impairment of resources. The NPS played a very active role in defining fish mitigation arrangements in Skagit Project Relicensing. NCCC believes it necessary for the NPS to take a stronger role in oversight of fish management in light of the transboundary management issues with Canada and the need to think of changing fish management needs as the reservoir system ages (less nutrients available). What is the NPS goal of fish management of fisheries? What about management of hunting where mountain goat numbers have plummeted in the North Cascades?

Why does the RLNRA Management call for no lead in hunter's ammunition but not the same for anglers?[The American Fisheries Society new policy white paper calls for banning of lead shot, etc. in fishing].

Comment on Alternative C

As indicated above, N3C strongly believes that float plane landings and take-offs on Ross Lake are incompatible with the backcountry and wilderness experiences that impacted by the very loud sounds associated with float planes.

Comments on Alternative D

N3C supports some of the proposed changes under Alternative D and would like to see these incorporated into the final management plan.

We support movement of the Wilderness Information Center to State Route 20, particularly to the Marblemount area where it could be combined with a new visitor center.

We strongly support the research and monitoring that are currently being conducted by the North Cascades National Park and enthusiastically support additional resources for wildlife research and monitoring in the RLNRA and North Cascades National Park.

Comments on RLNRA and North Cascades National Park Boundary Changes

N3C believes that the current North Cascades National Park boundaries are inadequate for preserving, restoring, and managing biodiversity within NOCA and especially RLNRA. Critically important alpine and subalpine areas should be added to help assure recovery of wolf, grizzly bear, wolverine, and mountain goat populations. Essential low elevation forest and headwater stream habitats should be added to help support recovery of spotted owl, marbled murrelet, Chinook salmon, and bull trout populations.

Park expansion would also support conservation of plant diversity, wetlands, amphibians, small mammals, and song birds.

We recommend that the following areas be added to the North Cascades National Park.

- All of the Bacon Creek watershed that is managed by the Forest Service.
- All of the Cascade River watershed north of the river that is managed by the Forest Service.
- The block of Forest Service land north of Baker Lake from the current park boundary on the east to Swift Creek and Shuksan Creek on the west.
- The block of Forest Service land north of Shuksan Mountain, including Goat Mountain, Mt. Sefrit, Mt. Larrabee, Tomyhoi Peak, and low elevation wetlands along the Nooksack River.
- All of the RLNRA, with the exception of the FERC area around Ross Lake and State Route 20.
- All of the Skagit River watershed managed by the Forest Service east of the Park to the North Cascades crest.
- All of the Forest Service lands in the upper Methow River watershed above Lost River, Early Winters, and Wolf Creek

NCCC looks forward to continued dialogue with NOCA and its consultants on this important management planning process. If we can amplify or clarify comments made in this letter, please do not hesitate to contact us.

Sincerely,

Jim Davis and David Fluharty on behalf of the N3C Board
3621 NW 64th St
Seattle, WA 98107
206 783-9340

1667



NORTH CASCADES INSTITUTE

810 State Route 20, Sedro-Woolley, WA 98284
360-854-2599 www.ncascades.org

PERC # 833

Chip Jenkins, Superintendent
North Cascades National Park
810 State Route 20
Sedro-Woolley, WA 98284

Comments on Ross Lake General Management Plan

Thank you for the opportunity to comment on the Ross Lake General Management Plan. North Cascades Institute strongly supports Alternative B – the preferred alternative, although we note that the items that most directly affect the Institute and our educational programs in the National Park and Ross Lake NRA are similar throughout Alternatives C and D as well.

We would like to comment on the following specific items, which we believe impact education programs in the Ross Lake NRA.

SEAPB

1. We support the partial ban on float plane operations on Ross Lake, and urge the park to consider a ban on Diablo Lake as well. While we have limited experience with float plane operations in NOCA, I have experience with them in Alaska where they may pose a real danger to students in canoes and kayaks, especially under windy and low visibility conditions.

BOUND 3

2. We encourage the Park to consider changes in boundaries between the NRA and the Park proper, to increase the Park's footprint along the Highway 20 corridor and the west bank of Ross Lake. Even though the administrative units are managed similarly, the increase in Park size here would be of great benefit, and not result in any significant loss of public use.

HKE 2

3. We support the proposed Thornton Lake loop trail. This would provide additional educational opportunities for the public, as would the suggested Diablo Lake loop trail that was not included in any of the proposed alternatives.

WILD 2

4. We support the increase in the Thunder Creek Wilderness Area. This would bring more of the park into wilderness designation and is important element of the Stephen Mather Wilderness.

FRCL 3

5. We support moving the Marblemount Ranger Station, or at least a Visitor Contact station to the highway. In the longterm, ease of visitor access to the superb information provided by the Wilderness Information Center, will continue the trend of educated and informed visitors to the wilderness. Having a Park presence on Highway 20 would be the Park presence more visible and improve access for bicyclists as well.

MZONE 1

6. The change in Frontcountry Zone management to include the Environmental Learning Center makes good sense and is in keeping with how we perceive our presence at the Learning Center within the NRA.

Thank you for the opportunity to comment. I appreciate the excellent work that NOCA staff have done over the past several years to make this report as thorough as possible.

Sincerely,

Saul Weisberg

Saul Weisberg
Executive Director

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 13

Author Information

Keep Private: No
Name: Gregory Pecoraro
Organization: Aircraft Owners and Pilots Association
Organization Type: I - Unaffiliated Individual
Address: 421 Aviation Way
Frederick, MD 21701
USA
E-mail: greg.pecoraro@aopa.org

Correspondence Information

Status: Reviewed Park Correspondence Log: 28
Date Sent: 08/26/2010 Date Received: 08/26/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

August 26, 2010

Superintendent, attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 90284

Re: Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement

Dear Superintendent Jenkins:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 410,000 members, more than two-thirds of the nation's pilots ? including 12,061 of our members in the state of Washington. On behalf of our membership, AOPA is committed to ensuring the future viability of and general aviation access to our public lands and waters. To that end we submit the following comments on the Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement (GMP/EIS).

AOPA is opposed to the preferred alternative, Alternative B, because it severely limits seaplane access to the Lake by restricting seaplane activity to the extreme northern and southern reaches of Ross Lake.

Anecdotal evidence provided to us by pilots who use the lake as well as NPS staff is that seaplane usage occurs on the average of 12 to 24 operations per year and that there is no history of complaints about seaplanes. Seaplane use of the recreational area has never been excessive and there is no data indicating a significant increase in use is likely over the life of the new management plan.

One of the consequences of limiting seaplanes to the north and south ends of the lake is the denial of access to seaplane friendly campsites. The best suited campsites are those with a north facing dock that protects the aircraft from the southerly swells on the lake. By not allowing seaplanes access to the central portion of the lake the number of campsites with north facing docks is dramatically reduced.

Seaplane pilots and visitors to the national parks recognize the need for all users to enjoy their experiences. Normal operating procedures for seaplane pilots include flying friendly to avoid creating disturbances by reducing power settings after takeoff, minimizing over flights and keeping a sharp lookout for other vessels and people on the water. These flying friendly procedures are also known as noise abatement procedures and are a voluntary way of ensuring that other visitors to the NRA are not excessively bothered by the sounds of normal seaplane operations. Seaplane pilots as well as land plane pilots overflying Ross Lake are asked to remain at least 2,000 above ground level while overflying charted National Park Service areas in accordance with FAA Advisory Circular 91-36, Visual Flight Rules (VFR) Flight Near Noise-Sensitive Areas. Incorporating these procedures into the seaplane access policy would be acceptable and AOPA is willing to assist the NPS in working with other stakeholders to help craft sensible procedures.

Normal seaplane operations while in the approach, landing and taxiing phases are made at very low power settings and do not generate a significant amount of sound. In fact, the phase of flight that generates the most amount of sound is during takeoff and studies show that the sound levels exceed the federally accepted residential noise threshold of 65 dBA day-night average sound level (Ldn) for less than 60 seconds. By that measure, Alternative B would restrict seaplane access to the lake because of less than half an hour of noise over the course of an entire year.

Even as NPS contemplates limiting seaplane access, we note that motorboats are currently allowed in both the front country and back country management zones according to Table 4-1 of the draft GMP/EIS. We suggest that since seaplanes operate on or near the water in a specific manner and for much shorter periods of time than motorboats, seaplanes should enjoy the same access as motorboats do under the preferred alternative. AOPA respectfully requests that change to the preferred alternative so that current seaplane access is maintained.

In summary, AOPA supports continuing the current access seaplanes have to Ross Lake and respectfully requests that the limitations on seaplane access contained in the preferred alternative be removed as they are the equivalent of swatting at a mosquito with a sledge hammer.

Thank you for the opportunity to provide comments on the draft general management plan and environmental impact statement. If we can be of further assistance please contact us at 301-695-2200.

Sincerely,

Gregory Pecoraro
Vice President
Airports and State Advocacy

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 700

Author Information

Keep Private: No
Name: John J. McKenna
Organization: Recreational Aviation Foundation
Organization Type: I - Unaffiliated Individual
Address: 1711 West College
Bozeman, MT 59715
USA
E-mail: jmckenna@theraf.org

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 08/26/2010 Date Received: 08/26/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Folks:

Thank you for taking the time to review the comments provided. The Recreational Aviation Foundation supports the continued access to Ross Lake via float-plane. In the reviewing the information we find no reason that the continued use of the lake by float-plane should not be continued. We have submitted comments that outline in more detail our reasons, but the short version is we believe the float-plane access has not created any detrimental effects to the lake or the area. We would appreciate your consideration for the aviation community.

Thank you,
John McKenna
President
Recreational Aviation Foundation

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 721

Author Information

Keep Private: No
Name: Walter B. Windus, Chairman
Organization: Seaplane Pilots Association
Organization Type: I - Unaffiliated Individual
Address: 3859 Laird Blvd
Lakeland, FL 33811
USA
E-mail: wwindus@msn.com

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear Sir,

On behalf of the 8400 members of the Seaplane Pilots Association, this is to request that you make no changes to the current seaplane access to Ross Lake.

Very few seaplanes land on Ross Lake therefore their environmental footprint is nearly non-existent. What little noise they do make, which occurs on takeoff from the lake, is of short duration and diminishes rapidly as they leave the area. Seaplanes are not like Jet Skis (Personal Water Craft), which make continuous noise as they travel around the lake. Seaplanes typically operate at the center of the lake when they arrive and depart, and when near the shoreline, they are in the displacement mode and travel very slowly at very low power and minimal noise.

It is very unlikely that there will be any significant increase in the number of seaplanes landing on Ross Lake in the future since the seaplane fleet is not growing and is not forecast to grow in the future.

Please consider these comments in your deliberation and again we request that you make no changes to the current policies regarding seaplanes on Ross Lake.

Best regards,
Walter Windus, Chairman
Seaplane Pilots Association

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 495

Author Information

Keep Private: No
Name: Timothy Manns
Organization: Skagit Audubon Society
Organization Type: I - Unaffiliated Individual
Address: P.O. Box 1101
Mount Vernon, WA 98273
Mount Vernon, WA 98273
USA

E-mail:

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

September 30, 2010
Skagit Audubon Society
P.O. Box 1101
Mount Vernon, WA 98273

Superintendent
Attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284

Dear Superintendent Jenkins,

We appreciate your sending Skagit Audubon Society the newsletters and CD for the Ross Lake National Recreation Area Draft General Management Plan and Environmental Impact Statement. This letter contains the comments of Skagit Audubon's Board on these documents.

In most respects, Skagit Audubon supports the selection of Alternative B as the Preferred Alternative. We support its recognition of Ross Lake NRA's significance as a gateway to wilderness; its emphases on resource protection and on inventory and monitoring using the National Park Service's "vital signs" approach; and its call for enhanced interpretation and education by the NPS and its partners.

The mission of Skagit Audubon is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. We know that the National Park Service is charged with providing for people's enjoyment of the park's resources and doing so in a manner that leaves those resources unimpaired. Our comments are offered in light of that challenging charge and in relation to Audubon's purposes.

We are aware that recreational rock climbing has been taking place for some years in Newhalem Gorge, and perhaps also elsewhere in the NRA, and that there have been impacts. Extensive coverage of moss and other plants has been stripped off; rocks as large as boulders have been moved to improve sites for rock climbing, sometimes with the help of mechanical devices; and protection has been drilled into rock faces. We view this type of resource damage as regrettable as well as illegal, but the damage having been done and the push for allowed climbing areas continuing, we agree with the idea of establishing designated places for this activity, preferably where existing damage cannot be practically repaired. We do nonetheless assume that a thorough environmental assessment with opportunity for public comment will precede the designation of such climbing areas and that implementation will include education about the preservation part of the NPS mandate in addition to enforcement. Our concern is, of course, that impacts to the natural environment be minimized and that areas associated with scarce habitats or species not be designated for rock climbing.

The draft GMP/EIS includes a good description of the problems confronting Colonial Creek Campground and Goodell Creek Campground from their location in geo-hazard zones. Some of us have witnessed the results of debris flows and floods in Colonial Creek Campground multiple times. Since the hazardous events, in the form of floods and debris flows, occur during the off-season the threat to public safety appears to be minimal. We agree with Alternative B's approach of trying to replace storm damaged facilities at non-hazard areas nearby but not rebuilding them within the hazard zones. At one point in Volume I of the plan, the possibility is raised of replacement campground development near the Ag Ponds west of Newhalem. This is an area well-known to birders for its avian diversity and nesting species rare west of the Cascades; for example, American Redstart, Veery, and others. On page 234 of Volume II in the Wild & Scenic River Eligibility analysis, the document notes the unusual quality and abundance of the type of habitat here (cottonwood overstory). Any decision about development in the Ag Ponds vicinity should be preceded by a thorough study of the species dependent on that habitat, the particular areas they use, and their ability to withstand the impacts of development.

We note here that we support inclusion of the NRA's reach of the Skagit River below Gorge Powerhouse as well as Newhalem Creek and Goodell Creek in the Wild and Scenic River System. This designation will increase recognition of their important values and, in the case of the Skagit, promote cohesive management with the U.S. Forest Service in its responsibility for the Skagit below the Recreation Area.

Another wildlife-related concern we have with the Preferred Alternative pertains to statements about the acceptability of a reduction in the percentage of Core Area in the Recreation Area's Grizzly Bear Management Units. We support the restoration of Grizzly Bears to the North Cascades Ecosystem and urge the National Park Service to be active with its partner agencies in preparing the E.I.S. needed before implementing a recovery plan. In the meanwhile, we think a cautious approach is necessary in adding development, including more miles of high use trails in these Bear Management Units. In response to public interest and the possibility of increased visitation, Alternative B calls for adding some trails generally in the State Route 20 corridor. If the proposed routes are not within prime Grizzly Bear habitat bear biologists might consider them as not constituting decreases in Core Area, and these new trails would be acceptable. However, the same might not be true for the mentioned reroute of the Thornton Lakes Trail or a new cross-border trail near Hozomeen. The draft GMP notes that recovery has proceeded well

in the Northern Continental Divide and Greater Yellowstone Ecosystems with a lower percentage of Core Area, but, even if this statement about percentages in the Rockies is accurate as written, we are unwilling to assume that the North Cascades Ecosystem provides equivalent habitat for the bear and its recovery. We note and strongly support "Guiding Principle No. 1" (Volume I, page 42) which states that "North Cascades NPS Complex strives to use science in making informed decisions." One of the things we like about Alternative B is its call, building on this principle, for continued inventory, monitoring, and research to provide a scientific basis for management decisions. We strongly support a careful, science-based approach to siting any new development, including trails, in Ross Lake NRA in the interests of resource protection and restoration and fulfillment of the NPS mission. The restoration of the Grizzly Bear to the North Cascades is too important to allow a reduction in Core Area on the assumption that recovery will proceed here as it has in the Northern Rockies. We support no net-loss of Core Area in quality habitat for Grizzly Bears.

We appreciate the attention paid in the draft GMP/EIS to the natural soundscape of the Recreation Area. It is noted that at many places in the portion of the NRA that is part of the Stephen Mather Wilderness, vehicular noise from State Route 20 can be heard as can the sounds of aircraft. If people are hearing this noise, so too is wildlife with probable effects on natural behavior. Reference is made in Volume II, page 132, to the effects of loud vehicular noise on wildlife. We support the idea of working with Washington State to enforce present limits on such noise, and we urge the NPS to pursue stricter limits if, once enforced, the present ones insufficiently dampen the sounds of traffic.

Concern about the effects of noise on wildlife as well as on the experience of the great majority of Ross Lake visitors prompts us to request that you change the management zoning of Alternative B for Diablo and Ross Lakes to that shown for Alternative C. That is, almost all of both lakes should be zoned Backcountry, and seaplane use should not be permitted. While seaplane landings can be quite quiet, they would certainly in other ways disturb waterfowl, such as Common Loons, that accumulate on Ross Lake off Hozomeen late in the season. Some of us have seen 15 or more of this Washington State-listed sensitive species at one time within the area where Alternative B would allow seaplanes to land. We are concerned too about the high-decibel sound of seaplanes on takeoff and the effects this would have on many species, as well as visitors, over a large area of Diablo and Ross Lakes. Allowing seaplane use contradicts the plan's intent of preserving a quiet, near-wilderness experience and goes against the NPS mission of preserving wildlife in its natural condition in the national parks. Given the potential for federally listed species such as Spotted Owls and even Marbled Murrelets on Ross Lake, such disturbance could constitute "take" under the Endangered Species Act. We urge you to revise the Preferred Alternative to not allow use of Diablo or Ross Lakes by seaplanes.

Considering boats on Diablo and Ross Lakes, we support the plan's intent of encouraging the use of human-powered watercraft, retaining the ban on so-called personal watercraft (e.g. Jet Skis), and implementing limits on the horsepower and speed of boats while also requiring environmentally friendly engines (4-stroke or other appropriate clean technology).

We note that Alternative B calls for a ban on lead-based ammunition by hunters and lead-based tackle by people fishing in the recreation areas. Lead in the environment has devastating effects on waterfowl that ingest it from bottom sediments while feeding, and we strongly support banning it as described. We have also addressed this concern to the Washington Department of Fish & Wildlife, which we know shares jurisdiction related to these activities in the Recreation Area.

We strongly support NPS action to further Gray Wolf restoration in Washington State and restoration to the North Cascades of the Fisher as well as preservation of all other special status wildlife. Thanks to the

efforts of NPS staff and of other agencies and organizations further down the Skagit, there is a very extensive database of information on the importance of the Skagit to Bald Eagles. Skagit Audubon members have participated in the collection of this data over the years. We note that the discussion of the Bald Eagle in Volume II at page 39 does not mention the eagle nesting activity of recent years on the point just north of Little Beaver along Ross Lake's western shore. This is notable given the apparent absence of breeding Bald Eagles from the lake for many years.

In Volume II, on page 103, we find the statement: "It is assumed that demand for hunting within Ross Lake NRA would remain relatively constant under the No Action Alternative." At many other points in the draft GMP/EIS (e.g. page 105) the assumption is stated that park visitation will increase in proportion to population growth in western Washington and British Columbia. Why would not this assumption of visitation increase also pertain to hunter numbers under all the plan's alternatives? Greater population could well mean more hunters as well as more hunting areas lost to development or other factors and, hence, more hunting pressure in Ross Lake NRA.

Lastly, we are happy to see the emphasis on cooperation across agency and international boundaries in the management and protection of the area's natural and cultural resources. We think that this would be facilitated by some adjustment of boundaries, taking steps, for example, to redraw Ross Lake NRA's and North Cascades National Park's boundaries along topographic divides and to include creeks, such as Bacon Creek, in their entirety. We support designation of the Potential Wilderness acreages in Big Beaver and Thunder Creeks to full wilderness status. We feel this is particularly important in the Big Beaver Valley as an additional protection for the Research Natural Area there. We also support further institutionalizing the working relationship between the NPS and B.C. Parks by the designation of some type of international park. Being aware of some of the history of the previous attempt to do this, we understand the necessity of another organization taking the lead.

We who live in northwest Washington are immensely fortunate to have a National Recreation Area and National Park upstream, protecting an area whose wild beauty we so enjoy. As people interested in natural history, a very important part of our enjoyment depends upon the habitats, flora, and fauna which the National Park Service is mandated to protect. With the modifications and approaches suggested above, this plan can serve well in carrying out Ross Lake NRA's purpose. We appreciate all the work that has gone into the plan's preparation.

Thank you for the opportunity to comment.

Sincerely,

Timothy Manns
President, Skagit Audubon Society

PEPC Project ID: 16940, DocumentID: 34698 Correspondence: 524

Author Information

Keep Private: No
Name: Kenneth Wilcox
Organization: Skagit Environmental Endowment Commission
Organization Type: I - Unaffiliated Individual
Address: C/o Seattle City Light, 700 Fifth Ave, Suite 3300
PO Box 34023, Seattle, WA 98124-4023
Seattle, WA 98124-4023
USA
E-mail: Scott.Powell@Seattle.Gov

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 09/30/2010 Date Received: 09/30/2010
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

(Note: a signed, hard copy will be mailed with the same text as the following)

September 30, 2010

Skagit Environmental Endowment Commission
c/o Seattle City Light
700 Fifth Ave, Suite 3300
PO Box 34023
Seattle, WA 98124-4023

Superintendent
Attn: Ross Lake NRA Draft GMP/EIS
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284

Dear Superintendent Jenkins,

We appreciated the opportunity which the July 24th open house at the North Cascades Visitor Center provided the Skagit Environmental Endowment Commissioners to learn about the Ross Lake National Recreation Area Draft General Management Plan. Many of the commissioners submitted comments at

the topical stations that day, and during our subsequent meetings at the Environmental Learning Center we discussed aspects of the plan. This letter presents the consensus comments of the Commissioners.

We note the many references in this document to the relationship between the National Park Service (NPS) and the Skagit Environmental Endowment Commission (SEEC). We appreciate the recognition of the Commission's purpose and the importance of its relationship to the park administration in accomplishing their mutual goals. The following comments are offered in the spirit of supporting this well-grounded and long established relationship.

Selection of the Preferred Alternative -

For the most part the Commission agrees with the National Park Service's selection of Alternative B as the Preferred Alternative. The focus on trans-boundary cooperation in the Commission's purpose motivates us to prefer Alternative C's thematic emphasis on the National Recreation Area's (NRA) role in ecosystem management across boundaries. We note, however, that this emphasis, by policy, also applies within Alternative B. Volume I of the plan, at page 42, includes as a "Guiding Principle" inherent to Ross Lake NRA management "Trans-boundary Ecosystem Management," specifically mentioning SEEC and British Columbia Ministry of Environment. Alternative B with its thematic emphasis on the NRA as a gateway to wilderness is compatible with one of the Commission's principal purposes stated in the 1984 High Ross Treaty: "To conserve and protect wilderness and wildlife habitat." We also support Alternative B because it provides the best balance of protecting and preserving natural and cultural resources while adapting to increased visitation, maintaining the experience which visitors value in Ross Lake NRA, and enhancing present educational and interpretive services.

Soundscape and Motors -

We note that a high percentage of public comments call for Ross and Diablo Lakes to continue to provide an experience of quiet and lower-speed recreation using small and preferably non-motorized watercraft in a wilderness or near wilderness setting. One of the primary interpretive themes presented in Volume I (p.18) expresses this well: "The mountain wilderness serenity of Ross Lake attracts visitors to this unique, largely undeveloped reservoir." We further note and support the Desired Conditions for Natural Soundscapes on page 25: "Noise from management or recreational uses is minimized to provide a high-quality visitor experience and protect biological resources and processes that involve natural sounds ?Visitors have opportunities to experience and understand natural soundscapes." In Volume II, at page 10, the statement is made that, "The NPS recognizes natural sounds as inherent components of the resources it is required to protect under the Organic Act," implying that non-natural sounds which mask or interfere with natural ones should be minimized.

Given the volume of noise produced by seaplanes at takeoff we find permitting them to land on Ross and Diablo Lakes incompatible with these goals and the experience desired by the great majority of lake visitors. For these reasons, we prefer the Ross and Diablo Lake zoning under Alternative C (maps pages 101-105), designating almost all of both lakes as "Backcountry" and very little as "Frontcountry." Allowing seaplane use on these lakes permits the dramatic imposition of the experience of a very few people on the quiet recreation of everyone else over a considerable area. The description of the Backcountry Zone as including "areas that are dominated by natural conditions where recreational opportunities would focus on providing a sense of remoteness and immersion in nature within a mountainous wilderness setting" is the most appropriate one for these lakes if the present visitor experience is to be maintained and enhanced. We also urge the NPS to minimize its administrative use of helicopters and to prepare a management plan for scenic overflights governing their use of the airspace to minimize adverse effects on visitors seeking the special experience of quiet and remoteness Ross Lake particularly offers.

While there are presently very few seaplane landings on either Diablo or Ross, designating zones where this activity is permitted may encourage more such use and will concentrate it where it will affect the greatest number of people. While the developed area of Hozomeen is reasonably labeled "Frontcountry" because of its road access and facilities, the long unpaved road and wild surroundings enable visitors to experience it as a remote place. The noise of seaplane engines will work against maintaining this experience. For similar reasons, it is also important to do as described in Alternative B and restrict horsepower, boat size, and/or speed limits for boats on all lakes in the recreation area and continue to oppose any future proposal to pave the road to Hozomeen.

We would note here that seaplane noise is also likely to disrupt wildlife. In late summer Common Loons, a Washington State-listed sensitive species (Vol. II, p.41), congregate in the northern part of the lake, as some of us have personally observed, and would certainly be disrupted by seaplanes landing and taking off. Finally, it is inconsistent with regulations about private aircraft everywhere else in North Cascades National Park Service Complex to allow their landing in any part of the NRA. No where else in the Complex are private aircraft landings permitted except at the state-licensed airstrip in Stehekin and on Lake Chelan, where seaplanes provide access to a community without road connections.

Alternative B proposes a permit system for seaplane landings within the indicated frontcountry zones of Diablo and Ross Lakes. If allowing seaplane use of these lakes remains in the General Management Plan, we urge that the permit system include provisions to minimize noise at takeoff, effects on wildlife, and effects on visitors who have come to these lakes for an experience of quiet. We also assume that the permit system will address the safety of the general public in the vicinity of aircraft operations and of the pilots and their passengers in areas where stumps are just below the water's surface and driftwood is common. We note that Code of Federal Regulations 36 2.17(a)(2) (prohibiting "operating or using aircraft under power on the water within 500 feet of locations designated as swimming beaches, boat docks, piers, or ramps, except as otherwise designated") as written would have to be modified to permit seaplane operators to use the same docks and swimming areas available to boaters or new facilities would have to be provided specifically for seaplane use. Alternative B calls for expanding sound monitoring (Vol. II, p.124), which we support as needed to determine the effectiveness of noise reduction needs and strategies in Ross Lake NRA.

To maintain the type of experience Ross and Diablo Lakes presently offer, we support a continued ban on personal watercraft and Alternative B's proposed ban on (p.94) recreational activities that involve towing people behind boats.

We note that the plan addresses traffic noise associated with State Route 20 and its audibility at many places in the wilderness and backcountry portions of Ross Lake NRA. We support the determination to work with Washington State in pursuing enforcement of present regulations on maximum allowable noise limits and urge the NPS to support strengthening these if enforcement inadequately reduces noise. We also urge the NPS to pursue an educational approach to reducing noise levels through automobile associations, RV clubs, and motorcyclist organizations.

Facilities in Geohazard Areas -

Alternative B calls for replacing facilities damaged by natural causes in less vulnerable areas nearby, if possible, or elsewhere in the NRA, with the goal of no net loss of capacity. We agree that it would be pointless to restore storm-damaged portions of vulnerable campgrounds such as Colonial Creek and Goodell Creek camps rather than increasing capacity at Newhalem Creek Campground or other places. Any re-siting should be planned to minimize loss of old growth forest, as in the vicinity of Newhalem

Creek Campground, or of cottonwood overstory forest, cited in the plan as a habitat particularly important for nesting bird species uncommon west of the Cascades. The latter would be a concern if development were planned for the Ag Ponds area west of Newhalem.

Diablo Townsite Land Exchange -

The draft GMP extensively addresses the idea of exchanging land in Diablo Townsite to give Seattle City Light control of Reflector Bar and the NPS control of the area known as Hollywood. The reasons for this proposed exchange are sound. Hollywood housing has helped alleviate shortages with the park staff and that of North Cascades Institute and would be useful in the future. However, we are concerned that if the determination is made to add the Hollywood buildings to the National Register of Historic Places the NPS would acquire a great expense in maintaining more structures than may serve a useful purpose. We realize it is possible to remove National Register listed structures, but we know that doing so is not a simple matter. Some structures in Hollywood could serve as overnight visitor lodging, but the real need, as stated in the plan, is for a safe place to establish campsites to replace those that are vulnerable and likely to be lost at Goodell and Colonial Creek Campgrounds. Due to space limitations, retaining all the present buildings would preclude developing a campground, and there are few, if any, acceptable alternative locations in the Recreation Area. We are also aware of the large financial burden the NPS would acquire for maintaining and possibly replacing utilities infrastructure at Hollywood. We note and support the reference in the plan to Seattle City Light retaining responsibility for this infrastructure. Because of these concerns, we support a focused planning/feasibility effort to determine whether the Hollywood structures can be preserved and managed at an affordable cost. If their continued maintenance and use are deemed impractical, then this specific plan should consider alternatives that may or may not include a small campground.

Grizzly Bear Core Area Management -

On page 71 of Volume I, "Grizzly Bear Core Area Management," it is stated that Core Area for the 6 Bear Management Units in Ross Lake NRA presently ranges from 82% to 92%, and that the North Cascades Ecosystem Interagency Grizzly Bear Management interim guidelines call for no net loss of Core Area. The draft GMP argues that because these percentages are greater than in the Greater Yellowstone and the Northern Continental Divide Ecosystems, where Grizzly Bear recovery is meeting success, it would be acceptable to reduce the percentage in Ross Lake NRA by adding new trails. We support a more conservative approach that does not assume the ability of the North Cascades Ecosystem to recover Grizzly Bears to be equivalent to that of the other mentioned recovery zones.

We read in the draft GMP that in their comments many members of the public support additional trails for day hikes in the State Route 20 corridor. Our understanding of the determination of the Core Area of Bear Management Units is that it involves considering quality of habitat as well as calculations of trail mileage, levels of visitor use, and other numerical factors. New trails in lower quality habitat relatively close to such developments as State Route 20 may not affect Core Area in any significant way. We urge that in high quality habitat every effort be made to keep the total mileage of high use trails, as defined by the Grizzly Bear Committee Taskforce Report referenced at Volume I, page 71, at or below the present number. For the same reasons and for compliance with the Wilderness Act, we support the closing and restoration of the furthest half-mile of the Thornton Lakes Trailhead Road within the Stephen Mather Wilderness. The mentioned moving of the Thornton Lakes Trail to a new location and the possibility of a trans-boundary trail near Hozomeen would require careful analysis by bear biologists for potential effects on Grizzly Bear recovery. If the Hollywood area of Diablo Townsite were to become a focus of visitor activity, there would be increased use of the Stetattle Creek Trail. It would improve people's experience of this trail to upgrade its condition and to modify it to end at a scenic view or other feature rather than simply fading out as now. These changes and simply increased use of the Stetattle Creek Trail would also

require careful consideration of the implications for grizzly recovery.

We urge the NPS to be as proactive as possible in advancing Grizzly Bear recovery in the North Cascades in cooperation with adjacent land management agencies on both sides of the international border and to continue managing human activities, such as camping, with bears in mind.

Other Wildlife Issues and Programs -

In furtherance of SEEC's purposes, the Commission supports the park's inventory and monitoring program using the vital signs approach to continually improve park management through a greater reliance on scientific information to guide decision-making (Vol. II, page 43).

In Volume II, at page 31, in the section describing Bald Eagles in Ross Lake NRA we note the absence of reference to the eagle nest active in recent years along the west shore of Ross Lake just north of Little Beaver.

We support Alternative B's proposed ban on the use of lead-based ammunition and lead fishing tackle (pages 147 ? 148). These lead products have had a devastating if unintentional effect on waterfowl such as Trumpeter and Tundra Swans in western Washington ingesting lead as they feed.

We appreciate the emphasis which the preferred alternative places on maintaining and expanding the role of interpretation and environmental education in Ross Lake NRA both by the National Park Service and its partner organizations such as North Cascades Institute (NCI) and Seattle City Light, both individually and in cooperation. We support the emphasis on incorporating the results of cultural and natural science research into interpretive and educational programs with an ecosystem preservation focus wherever possible. The Commission's on-going financial support for both NPS interpretation, particularly in partnership with B.C. Parks, and for the Institute's Mountain School program exemplifies the Commission's similar point of view. We would note the opportunity for cooperation with the Hope Mountain Centre for Outdoor Learning, some of whose programs take place in the upper Skagit Watershed in Canada including the Hozomeen vicinity.

Woody Debris on Ross Lake -

Finding a solution for the management of woody debris on Ross Lake has been a focus of the Commission's attention. We support the statement in Alternative B (p.174) calling for research into how best to manage this woody debris, keeping organic matter in the aquatic system. An effective solution will reduce the hazard to boaters while also avoiding the environmental impacts of previous practices.

Air and Water Quality -

We support Alternative B's call for pursuing redesignation of the Class II Airshed within Ross Lake NRA to a Class I Airshed consistent with adjacent national park and forest lands (p.92). Air quality is an important aspect of both visitor experience in the recreation area and protection of its resources. As population grows regionally and internationally, the threat posed by deteriorating air quality will increase. We note that in Volume II, "Impacts from Alternative B ? Air Quality" on page 122 the effects of a change to Class I are not described.

We also note and support Alternative B's proposal to require that all boat engines on the lakes be 4-stroke, the new direct injection two-stroke, or have equivalent lower emission technology, which will have beneficial effects on both air and water quality.

We are happy to see that the document at many points addresses climate change and that this park is

playing a significant role in documenting related impacts, educating the public about these, and striving to reduce impacts from its own operations.

Water quality continues to be a particular focus of the Commission's attention, and we appreciate the summary on this topic in Volume II (p.18ff), including the map "Water Quality Risk of Watersheds Draining into Ross Lake NRA," which includes the entire upper watershed. This map effectively draws attention to the threats to water quality originating in the U.S. and those in Canada. Consistent with its purpose, the Commission continues to focus attention on monitoring threats from development and mining and to seek ways of addressing these threats before they mature and urging cleanup of existing problem areas, such as the Azurite Mine.

This focus also relates to the Commission's interest in the American Alps Legacy Project as it pertains to Ross Lake NRA. While as mentioned in the draft plan the present working relationship between the National Park Service and the U.S. Forest Service is effective at protecting lands in the Skagit Watershed, this may not always be the situation in the future. Boundaries following hydrologic divides would provide for simpler and more consistent management in the long run. The draft acknowledges that Seattle City Light no longer intends to develop facilities envisioned many decades ago, yet those early plans had a large effect on the location of the NRA boundaries. Because the reality on which those boundaries were based has changed, it is appropriate to thoroughly re-evaluate the boundaries and modify them as needed to reflect current needs and expectations. Though it may be functioning at the moment, the status quo is grounded on ideas and plans now obsolete. Boundary evaluation does not necessarily need to be part of the GMP, but the plan should explicitly allow for it. We support the intention stated in the plan to administratively designate the area of potential wilderness in Thunder Creek as fully part of the Stephen Mather Wilderness.

International Boundary Issues -

We note the emphasis Alternative B places on recreational enhancements consistent with maintaining the present type of experience available to Ross Lake NRA visitors. In particular, we appreciate the intent to pursue the creation of a trail link with Skagit Valley Provincial Park (p.91), which accords with one of the goals given the Commission in the High Ross Treaty: "To connect, if feasible, Manning Provincial Park and the North Cascades National Park by a trail system."

We note that on page 47 of volume I in the section titled "Planning Issues and Concerns" the three items under "International Boundary Issues" are in part addressed elsewhere in the draft GMP. There is later reference to a preference, which we support, for not paving the road to Hozomeen (p.91). Alternative B's call for replacing the present Hozomeen ranger station with a more adequate facility that would also provide interpretation and allow for cooperative staffing with B.C. Parks pertains to the issue of the character of the entry into the U.S. (p.91). We support this proposal. We strongly support the statement urging the NPS to undertake collaborative planning with B.C. Parks on the list provided of specific operational issues and trans-boundary resource topics, such as wildland fire, forest health, and resource protection. The final item in the boundary issues list is the idea of international park designation to promote cooperative management. We note that this concept is discussed on page 194 in the section "Actions Dismissed From Further Consideration" based on the reasoning that there has long been a working relationship between Canadian and U.S. land managers in this area. The statement is made that dismissing further consideration of the idea in the GMP does not preclude other entities from working on such a proposal. Some form of international park designation seems a logical evolution of the established trans-boundary working relationship.

We appreciate the opportunity to comment on this plan which is of great importance in the Commission's

pursuit of its mandated goals.

Sincerely,

Kenneth Wilcox Peter Kennedy
U.S. Co-chair Canadian Co-chair

**Washington Seaplane Pilots Association
c/o Bruce Hinds, President
10719 Olympiad Dr.,
Port Orchard, WA 98366**

September 30, 2010

Chip Jenkins, Superintendent

North Cascades
National Park Service Complex
7280 Ranger Station Road
Marblemount, WA 98267

Dear Chip:

Thank you for the opportunity to comment on the National Park Service's Draft Management Plan for the Ross Lake National Recreation Area.

We would like to express the support of the Washington Seaplane Pilots association for Alternative A, unless Alternative B was modified to accept continued full access by seaplanes to Ross Lake.

There are many reasons we believe the restrictions on Seaplanes in Alternative B would not be beneficial. Following is support and rationale for our recommendation as well as a summary of our perspective.

Background and Rationale

There are virtually no campsites within the proposed seaplane accessible areas which would provide safe overnight tie-up for a plane for camping. Seaplanes require a north facing dock (at Ross Lake) to limit the south swell. The north end of the lake is inaccessible much of the spring and early summer. Furthermore, there is a stump line which could prove hazardous. The unintended consequence is that it would likely create a corridor of planes crossing the length rather than just landing at a specific campsite. In the end, it probably wouldn't help with noise reduction.

It is important to note that Ross Lake is 22 miles long and approximately 1 to 2 miles wide. If, for example, one were to land at Devil's Junction, it is unlikely that any other campsite would even hear the plane arrive. In my personal experience camping at Ross a couple year ago, several parties came to greet us and stated they never heard or saw us come in. Only one party heard us arrive, and they along with the others were very pleased to see us there. In fact, at least a dozen people have told me how pleased they were to see us travel there by floatplane. They stated that floatplanes were "such a historical northwest tradition."

There are only a limited number of campsites on the entire lake which are well suited for float planes. So under the current full-access situation, multiple seaplanes could use the lake at one time and it is likely that they wouldn't see or hear the other plane(s). There are only about 5 campsites which are definitely acceptable for overnight camping via seaplane. They are Cougar Island, McMillan, Spencer's, May Creek (Possibly), Devil's Junction, Cat Island, Little Beaver and Silver Creek (possibly).

**Washington Seaplane Pilots Association
c/o Bruce Hinds, President
10719 Olympiad Dr.,
Port Orchard, WA 98366**

It is also a safety issue to try to limit access to a small area of the lake. Wind and weather can be unpredictable complications. Landing and departure must always be into the wind. Limiting access to such a small area would present safety challenges.

Seaplanes are a classic part of the history of the northwest. Furthermore, they are part of the history of Ross Lake. Wayne Dameron, the founder of the Ross Lake resort, accessed the lake for many years via his float planes. Via his Aeronca Sedan he first located the lake and later accessed the resort in his Cessna 195.

Seaplanes provide access to a segment of the population which would not otherwise be able to access Ross. They provide a means of access for the elderly and the handicapped unable to readily access the lake by other methods.

Few, if any, noise complaints have been raised by visitors or anyone else. Only about 20 to 30 floatplanes visit Ross each year. It has been suggested that the concern is that large numbers of seaplanes will visit Ross. This concern was raised in the 1980's and was never realized. Since that time there are much fewer seaplanes operating in the United States and fewer seaplane rated pilots overall.

In terms of total noise signature, powerboats cause considerably more noise and if they are allowed continued access, then so should seaplanes. The FAA and federal agencies measure noise on total sound impact which takes into account the duration of the sound. With the federal standard, floatplanes are well under the total noise production of the powerboats.

Seaplanes are often mentioned in the same "motorized usage" sentence as jet-skis and motorboats; however, they differ vastly in use, pollution levels, and overall noise output. Seaplanes are a mode of transportation used to access recreational opportunities on the lake. And seaplanes only produce noise (louder than a motorboat) when taking off, which doesn't last more than 20 to 30 seconds. The total sound impact in a year is no more than 4 to 5 minutes on any one area of the lake. Most visitors I have met have stated that they have rarely, if ever, seen or heard a seaplane on the lake.

A noise abatement policy can greatly reduce the noise and make it nearly unheard except in a limited area. We recommend that the NPS publish a noise abatement policy to address and manage noise from seaplanes.

Seaplanes pollute less than any motor boats. Engine exhaust does not enter the water. And seaplane pilots are good stewards of the parklands. We typically take out more than we bring in.

A permit system limiting seaplane access is unnecessary and may be costly and difficult to administer. An online reservation system could be helpful, particularly if it identified campsites which are best suited for seaplanes. Seaplanes (as well as boaters) often need flexibility due to schedule and weather changes. The current telephone based system works well and is cost effective.

Seaplanes don't require additional infrastructure. Whereas the Ross Lake parking lot is capacity constrained in the summertime, floatplanes don't require automobile parking in restricted areas.

Seaplane pilots are responsible, conscientious, and formally trained wilderness visitors. They are federally licensed, legally bound to not consume alcohol while flying, and required to complete recurrent

**Washington Seaplane Pilots Association
c/o Bruce Hinds, President
10719 Olympiad Dr.,
Port Orchard, WA 98366**

training every two years. Few other Ross Lake guests are held to such rigorous conduct and training standards.

The charter for National Recreation Areas stipulates that "Such areas should be readily accessible at all times, for all-purpose recreational use." Limiting seaplane use is not consistent with this requirement.

Summary Recommendations

In summary, the WSPA requests that seaplane access remain as it is today and has been since the inception of Ross Lake.

Whereas an electronic reservation system would be acceptable, we do not support arbitrary limits for permitting of seaplane access. It is unnecessary and would only serve to restrict a segment of the population.

We do support the creation of a seaplane noise abatement policy in order to address concerns about noise and to minimize any impact.

I personally, and on behalf of the Washington Seaplane Pilots Association, recommend keeping seaplane access as it is today.

Sincerely,



Stephen Ratzlaff
Board Member
Washington Seaplane Pilots Association



Chip Jenkins, Superintendent
North Cascades NPS Complex
810 State Route 20
Sedro-Woolley, WA 98284-1239
noca_superintendent@nps.gov

SEP 30 REC'D

September 30, 2010

Submitted via E-mail and Hard-Copy

**RE: Comments on the Draft General Management Plan/ Environmental Impact Statement
for Ross Lake National Recreation Area**

Dear Chip:

The Wilderness Society (TWS) is pleased to submit these comments regarding the Draft General Management Plan/Environmental Impact Statement for Ross Lake National Recreation Area ("Ross Lake Draft GMP" or "Draft Plan"). Overall, we support Alternative B as the Preferred Alternative and are very supportive of the recommendations for Wild and Scenic Designation of the 11-mile upper Skagit River segment and Goodell and Newhalem Creeks.

Founded in 1935, The Wilderness Society is one of the nation's oldest and largest not for profit conservation organizations. Our mission is to protect wilderness and inspire Americans to care for our wild places. Toward this end, we work in partnership with local communities, businesses, conservation organizations and local citizens to find solutions for the preservation and stewardship of our national public lands. Representing more than 500,000 members and supporters nationwide and more than 20,000 members and supporters in Washington State, TWS has long been involved in land management issues throughout the state.

TWS has launched an initiative to focus attention on the North Cascades. This landscape stretches from the I-90 corridor on the south to the Canadian border and from Puget Sound to the eastern extent of the watersheds draining off the Cascade crest. The Wilderness Society and its partners envision the North Cascades as a celebrated national treasure, where recreational opportunities are enhanced and well-planned, where local communities are vibrant and sustainable, and where this unique landscape is preserved for generations to come.

This vast, largely intact ecosystem is capable of supporting healthy populations of wide-ranging wildlife. It has the highest concentration of glaciers in the continental U.S., and the clear, cold rivers fed by those glaciers contribute much of the fresh water that flows into Puget Sound to the west and the Columbia River to the east. These river systems support populations of endangered wild salmon, provide water for people and agriculture, and yield hydroelectric power that supports a significant element of the region's economy. The North Cascades also boast some of the best wildland recreation the Pacific Northwest has to offer. Additionally, this region is facing challenges associated with increasingly

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Pacific Northwest Region



expanding human populations and global climate change. For these reasons, TWS is working to protect and restore the North Cascades region so its wildlands sustain vibrant, healthy human and natural communities resilient to the impacts of climate change and other challenges.

TWS works to ensure that recreation on federal lands is increasingly ecologically and economically sustainable and is contributing to the public's health, well being and support for wild public lands. Direct experience is what inspires people to care for wild places, and recreation is an important source of such inspiration. This is why The Wilderness Society seeks to engage with all who visit and cherish our public lands. We envision deep, broad, and varied constituencies – traditional and new together – working to promote widespread and sustainable enjoyment of natural places. Only by doing so can we ensure in a democracy the public support for protecting America's public lands for all time to come – and ensure at the same time that all future Americans will be able to enjoy these experiences that we hold so dear.

Ross Lake National Recreation Area (NRA) provides a spectacular setting for Americans to experience our public lands. From the whitewater rafting on the Skagit, to viewing the largest concentration of wintering bald eagles in the lower 48, hiking in glacial cirques and hanging valleys in Goodell Creek, rock climbing at the Newhalem Crags, viewing the most glaciated headwaters of the Skagit watershed from a highway pullout, standing on the viewing platform in front of Newhalem Creek waterfall, backcountry camping with young children in remote boat-accessible campgrounds, kayaking on Ross Lake and boating on Diablo Lake, Ross Lake NRA provides a plethora of high quality recreational opportunities accessible to those with a broad cross section of skills and abilities. Ross Lake NRA is clearly a national treasure worthy of our appreciation, conservation, and enjoyment.

1. Support for Alternative B as the Preferred Alternative – an appropriate and commendable plan for Ross Lake National Recreation Area

Ross Lake National Recreation Area was established by Congress on October 2, 1969 “in order to provide for the public outdoor recreation use and enjoyment of portions of the Skagit River and Ross, Diablo, and Gorge Lakes, together with the surrounding lands, and for the conservation of the scenic, scientific, historic, and other values contributing to public enjoyment of such lands and waters” (82 Stat. 926) (Public Law 90-544). The purpose of Ross Lake National Recreation Area is to complement North Cascades National Park and conserve the scenic, natural, and cultural values of the Upper Skagit River Valley and surrounding wilderness, including the hydroelectric reservoirs and associated developments, for outdoor recreation and education.

Alternative B provides commendable direction of the management of Ross Lake NRA as an integral part of the North Cascades National Park Complex that is consistent with the authorizing language above. TWS supports the proposed increased recreation infrastructure in the front-country lands of the NRA that would expand day-use and overnight recreational opportunities for a range of abilities and interests. We are very excited to see the proposal for redesigned and constructed entrances – currently most visitors to Ross Lake are not aware that they are visiting lands managed by NPS. Clearly defined and celebrated entrances will enhance this awareness, appreciation, and support for the purpose and public ownership of these lands. We support NPS's approach in Alternative B to additional recreation

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infrastructure, including trails, campgrounds, and upgrades to visitor center facilities and parking opportunities. The plan balances the need for appropriate recreation with long-term stewardship of natural resources.

The natural resource management components of Alternative B provide appropriate direction for resource protection, and we are pleased with the comprehensive and collaborative approach North Cascades National Park has taken with regards to coordinating beyond their borders with adjacent land managers. This includes engaging Canada, the Forest Service, and gateway communities to the North Cascades. We particularly appreciate the leadership that NPS proposes to continue to play with regard to climate change. We appreciate the proposed combination of monitoring and allowing natural disturbance regimes room to operate while locating recreation infrastructure in places least likely to interfere. Additionally, the North Cascades National Park Complex represents a core of high quality, intact habitat within the North Cascades grizzly bear recovery zone. As such, we are pleased that the Draft Plan will protect Core Areas for grizzlies according to the recommendations of the North Cascades Ecosystem Interagency Grizzly Bear Management Subcommittee. The Invasive Plant Management Plan, including collaborating with adjacent landowners and jurisdictions, is essential to the long-term stewardship of Ross Lake NRA.

The Preferred Alternative also includes the necessary investment in interpretation and public education so that the scientific research and stewardship actions of the NPS can be well communicated and better understood by the public. Beyond just doing the right thing, the plan proposes to teach the visitors about those research results and stewardship actions and why they are important. This is a critical component of the Preferred Alternative. We are pleased to see the emphasis on leveraging partnerships throughout the Draft Plan. We specifically recommend that the NPS collaborate with the Forest Service to make the most of interpretive opportunities at the spectacular Washington Pass Overlook. This location presents an ideal place to highlight an east-side entrance/exit and the collaboration between the different land managers.

We support the provision, common to all alternatives, to close Thornton Lakes Road at the wilderness boundary. This is necessary to comply with the 1964 Wilderness Act. Additionally, we support the approach outlined in the Plan that would rehabilitate the one mile of closed road, formalize a parking lot and trailhead at the wilderness boundary in an existing disturbed area, and maintain and upgrade trail access to Thornton Lakes, and to determine whether a different trail design would enhance the trail experience to Thornton Lakes.

Regarding the Diablo townsite, we support the general concept of reallocation of ownership as described in Alternative B as it appears to be in the best interest of the public. As referenced in Alternative B, the public should be appropriately compensated for any discrepancy in land value. Additionally, we have a concern about the impact on the access of the trailhead that currently comes out of Reflector Bar. We want to be sure that this access will be maintained even if the NPS no longer owns the land. If that is not possible in its current location, we request that the trailhead be relocated on NRA land or that the trail experience be recreated elsewhere in the NRA.

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Ross Lake NRA offers world-class recreational opportunities, including unique forms of both land and water-based recreation. These activities are incredibly important to connecting people to nature, but do take a toll on natural resources and the number of participants does impact the quality of the experience. We advise the NPS to take a comprehensive approach where there is a need to address social and ecological capacity. In such cases, we recommend that an initial analysis be conducted to determine the resource capacity of the land to support a given use (be it boating, rock climbing, etc.). This analysis should represent the boundaries within which the use can be managed. Next, a needs assessment which looks at the social demand for a particular activity should be conducted. Management goals should then be set so as to provide equitable access to the activity within the underlying capacity of the land. We applaud the outlined approach included in the Draft Plan on page 182 which addresses user capacity in a way that can incorporate the steps and achieve the goals of our above recommendations.

TWS has successfully partnered with North Cascades National Park, the Access Fund, Washington Trails Association and a local youth climbing team to conduct restoration work along a sports climbing access path in Ross Lake NRA for the past several years. The NRA clearly presents attractive locations for additional climbing activity. We applaud the approach proposed to identify clearly defined Climbing Management Areas within the NRA. The transparency and clear communication of the process and the proposed dialogue with stakeholders and the general public are forward thinking and provide a good example of recreation planning proposed right. Again we emphasize the appropriate application of resource capacity and equitable division of access within this process.

Beyond this, we specifically call out our support for the following provisions of the Preferred Alternative:

1. The advanced reservation option – which would allow some advance planning on both the part of visitors and the NPS
2. Identification of a potential stock campsite in the frontcountry zone – pack and saddle stock users are traditional and historic users of public lands and we support finding an appropriate place to accommodate their use within the NRA
3. Recommended designation of the North Cascades Highway as a National Scenic Byway – this would bring additional recognition and funding opportunities to the management of this area
4. Prohibition of lead-based ammunition for hunting – evidence indicates that lead-based ammunition causes significant environmental damage and that alternatives are readily available
5. The administrative designation of the Thunder Creek Potential Wilderness Area as an addition to the existing Stephen Mather Wilderness as part of the National Wilderness Preservation System

2. Support for Wild and Scenic River Recommendations

We appreciate the quality work that was done on the eligibility and suitability analyses for Wild and Scenic River designation and we applaud the NPS for undergoing these analyses. We support the recommendations of 11 miles of the Skagit River (from the Gorge Powerhouse downstream to the boundary of Ross Lake NRA) as well as the recommendations of Goodell Creek and Newhalem Creek and the proposed classifications of all three entities. We appreciate that additional analyses regarding the eligibility of Bacon Creek, Thunder Creek/ Fisher Creek, Ruby Creek, Big Beaver Creek, Little

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Beaver Creek, and Lightening Creek were not possible, but their need in the future is acknowledged in the Draft Plan. Additionally, we acknowledge that there are several other creeks for which insufficient data are available, but the Draft Plan acknowledges that they could be revisited at such time when more data exist.

The designation of the upper Skagit River would complete the main-stem Skagit River designation from Sedro-Woolley to the beginning of the Skagit Hydroelectric Project near the town of Newhalem. This would allow for opportunities for holistic management of the river system. This system, which is the largest river draining into Puget sound, is the most glaciated in the lower 48 states, is home to seven species of anadromous fish and supports the largest population of wintering bald eagles in the lower 48, is a magnificent jewel of Washington State and we are excited about the ability to leverage the holistic planning and resource potential of its full designation.

3. Additional Specific Comments

Beyond our strong support for Alternative B and the Wild and Scenic River recommendations, we have the following comments:

- We are perplexed about the statement that there will be no net increase of trails in wilderness – the purpose and need of this policy is unclear. Again, we suggest that the approach of a resource capacity combined with a social needs assessment be combined to explore whether there exists demand for more trails in wilderness and, if so, whether the natural resources have the capacity to offer any additional opportunities.
- Although the Draft Plan does not propose any internal or external boundary changes, we want to be clear that TWS does not support converting any of the Ross Lake NRA lands into National Park. We are not aware of any clear management benefits that such boundary changes would accomplish. Additionally, NRA designation allows for continued hunting and hiking with dogs. As current data does not indicate that either activity is causing resource management concerns, the original legislative intent and direction for the NRA lands should remain as it has since its designation in 1968.

Again, we applaud the work in the Draft Plan and strongly support Alternative B with the additional recommendations noted. We look forward to working with you to make implementation of the Ross Lake GMP a success. Please feel free to contact me at 206-624-6430 ext 226 or cwilkerson@twsnw.org to discuss the content of this letter.

Sincerely,

Cynthia Wilkerson
Washington Program Manager

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Aug 19, 2010

SEP 13 REC'D

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Superintendent Chip Jenkins
North Cascades National Park Complex, 810 State Route 20
Sedro-Woolley, WA 98284-1239

Dear Superintendent Jenkins,

I support the National Park Service's intent to provide enhanced visitor opportunities while ensuring the long-term stewardship of the North Cascades National Park Complex ecosystem and wilderness. Therefore, I strongly support Alternative B of the Ross Lake National Recreation Area (NRA) Draft General Management Plan (GMP)/Environmental Impact Statement (EIS), with one modification.

Specifically, I support the transfer of the area identified as "Wilderness Zone" from the NRA to the national park proper, except for the land around Ross Lake, which should continue to be included in the NRA. Please reflect this boundary adjustment in the Final GMP/EIS.

Thank you for considering my comments.

Sincerely,

Mr. Daniel Steward
810 19th Ave
Seattle, WA 98122-4724
(206) 329-0127

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Sep 4, 2010

Superintendent Chip Jenkins
North Cascades National Park Complex, 810 State Route 20
Sedro-Woolley, WA 98284-1239

SEP 13 REC'D

Dear Superintendent Jenkins,

I support the National Park Service's intent to provide enhanced visitor opportunities while ensuring the long-term stewardship of the North Cascades National Park Complex ecosystem and wilderness. Therefore, I strongly support Alternative B of the Ross Lake National Recreation Area (NRA) Draft General Management Plan (GMP)/Environmental Impact Statement (EIS), with one modification.

Specifically, I support the transfer of the Highway 20 corridor, including the areas identified as Frontcountry Zone, Backcountry Zone, Wilderness Zone, and Skagit River Zone to the national park. The Hydroelectric Zone would remain part of the Ross Lake NRA. Please reflect this boundary adjustment in the Final GMP/EIS.

Thank you for considering my comments.

Sincerely,

Mr. Zak Ryersbach
PO Box 1281
Telluride, CO 81435-1281