

## UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF OUTDOOR RECREATION

PACIFIC NORTHWEST REGION

U. S. COURT HOUSE, ROOM 109 407 SEATTLE, WASHINGTON 96104

MAY 4 1986

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Colonel C. C. Holbrook
District Engineer
Department of the Army
U. S. Army Engineer District-Seattle
Corps of Engineers
1519 Alaskan Way South
Seattle, Washington 98134

Dear Colonel Holbrook:

With your letter of March 16 you transmitted preliminary recreation plans for the Edfro and North Fork sites on the Nooksack River and the Lower Sauk site and requested comments on them.

In our reply of April 5 we commented on the former two but indicated comments on the Lower Sauk would be submitted later as there were several considerations which needed to be taken into account in connection with this project.

In the preliminary plan for the Lower Sauk, it is mentioned that the North Cascades Study Report recommended portions of the Sauk and the Suiattle Rivers above the National Forest boundaries be managed as wild rivers. On this basis, the plan points out that, as the Lower Sauk site and the portions of the rivers it would inundate are outside of the project boundaries, the recommendations in the North Cascades Report would have only minimal effect on the project.

As you doubtless are aware, the preliminary wild rivers study report for the Skagit included the main river from Sedro Woolley to the Gorge Dam and the Sauk and Suiattle and Cascade Rivers to their headwaters. Senate Bill S-1446 recommends extension of the study area from Mt. Vernon to the Gorge Powerhouse; the Cascade River from its mouth to the confluence of the North and South Forks; the Sauk from its mouth to Elliott Creek; and the Suiattle from its mouth to Mill Creek. This proposed legislation also



provides that the Secretaries of Agriculture and Interior, after consultation with interested Federal agencies and Governors and officials of the states in which the rivers are located, shall determine if a joint Federal-State plan is feasible and desirable to the public interest to conserve segments of these rivers. It provides also that they shall submit their recommendations to the President for inclusion of any or all of them in a National Wild Rivers System.

The North Cascades Study Report included only recommendations on areas within the study area. As the National Forest boundary constituted the western boundary of the area under study, the report did not consider the Skagit River System beyond it.

The Lower Sauk project is close to the center of the river area designated in S-1446 for study by the Secretaries of Interior and Agriculture. Consequently, until such studies are made and appropriate follow-up action is taken, we cannot concur in the proposed project.

We have reviewed the preliminary plan for the development of the reservoir if the dam is constructed, and it appears adequate and logical. The initial and follow-up development costs for recreation facilities seem well conceived and appropriate for the project. Visitation estimates for ultimate use of 2,500,000 and visitor day values of \$1.00 are consistent with estimates we have made of comparable areas. Likewise, the benefit-cost ratio of 3.24 to 1 for only the reservoir use and development are reasonable.

As you are of course aware, we must consider local, regional, and national needs, values, programs, and benefits when evaluating a proposal which will affect recreation values. In this case, we must consider the value of the Skagit River and its tributaries nationally as a unit of a National Wild River System as compared to the benefits a single project which could adversely affect the overall values involved.

We have not made a study of the effect of eliminating part of the river system as a Wild River and are not in a position to compare recreation benefits of the proposed reservoir with those of either a complete or a partial wild river designation. We regret we are unable to give you a monetary comparision between project recreation benefits and wild river recreation benefits but at the present time, we must consider the benefits of the Skagit as a unit of a National Wild River System as superior to those of the Lower Sauk Project. We appreciate the opportunity to review the preliminary plans for this project and hope our comments will be of value to you in evaluating project recreation benefits.

Sincerely yours,

Fred J. Overly Regional Director