

**WHATCOM COUNTY**  
**Parks & Recreation Commission**  
3373 Mount Baker Highway  
Bellingham, WA 98226-9097



Sonja Max, Chair

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**JUN 20 2023**

**WHATCOM COUNTY  
COUNCIL**

January 19, 2023

RE: River Recreation on the South Fork of the Nooksack

Dear Executive Sidhu and Whatcom County Council,

I am writing on behalf of the Whatcom County Parks and Recreation Commission. Concerns regarding recreation on the South Fork of the Nooksack River, raised by tribal members of our community, have been brought to our attention. While the Commission and the WCPR do not have any jurisdiction over the matter, the Commission takes seriously issues that affect the recreational opportunities of Whatcom County residents. We also recognize the need to protect our native species and ecosystems, and that being good stewards of the land may mean altering or curtailing certain activities, or at the very least engaging in them responsibly.

It is our understanding that the primary concern on the South Fork is the health of salmon and their ability to spawn. In recent years the number of spawning salmon has diminished significantly. It is unclear what has caused this decline, though water temperature and water level both are known factors. It has been surmised that human activity in the summertime (e.g. rafting and tubing) could inhibit salmon spawning, and that human recreational activities should be prohibited.

If human recreation on the river can be positively linked to diminishing salmon population on this river, the Commission would support curtailing this activity. However, an evidence-based scientific study to support this claim has not been presented. A total ban on tubing would affect hundreds of residents and their families who may not have the means to travel out of the area for summertime recreation. River activities also draw people to the South Fork Valley who spend money on goods and services, boosting the local economy.

Prior to considering a total ban or eliminating recreational river access, the Commission recommends that more information is gathered by land managers, tribes and/or presiding jurisdictions. Questions and considerations to address the issues could include but are not limited to:

Does river recreation such as tubing contribute to lower water levels and/or changes in water temperature?

Does river recreation such as tubing impair salmon spawning behavior, or cause resting salmon to expend additional energy?

Could condition-specific bans be enacted that restrict activity only when critical benchmarks are reached? These could include water temperature; number of people floating the river; water flow/level; periods when salmon are actively traveling upstream or when reds are sighted.

Are there other factors contributing to the decline of salmon? Logging, pesticides from nearby farms, and predators such as the bald eagle could be contributing to this decline - we have no way of knowing what the root causes are. The situation is unlikely to improve if this key information is not known.

Can separated channels be created in critical areas so salmon and humans each have their own routes? This has been done successfully in Bend, Oregon's whitewater park.

A secondary concern that has been brought to our attention is an abundance of garbage left in inappropriate places and parking in no-parking zones. The Commission has no tolerance for irresponsible recreation, and recommends that a combination of educational signage and perhaps enforcement may be used to increase awareness and respectful use. It is possible that tubers and floaters do not know or understand the importance of this natural area, and would be better stewards if they did. It may also be possible to recruit volunteer organizations or groups to provide waste cans or clean-up parties.

The Commission is open to more dialogue on this topic and hopes that with thorough research a solution can be found that increases the population of our native salmon species, and allows humans to enjoy and recreate responsibly on these special waters.

Respectfully,

Sonja Max  
Chair, Whatcom County Parks and Recreation Commission

cc: Bennett Knox, Director, Whatcom County Parks and Recreation