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Date: January 31, 2013

Oregon State Aviation Board
3040 - 25th Street SE
Salem, OR 97302

Dear Oregon State Aviation Board,

As you are considering allowing the use of Waldo Lake by float planes, I want to share the Forest Service's perspective and experience managing the area around Waldo Lake.

The Willamette National Forest continues to support a full ban on float plane use of Waldo Lake, in concert with the current restriction of motorized boat use. There are four primary reasons we believe float plane use of Waldo Lake is not appropriate: 1) Visitors expect a quiet recreation experience, 2) noise impacts to surrounding wilderness areas; 3) protection of water quality; and 4) historic use of Waldo Lake by float planes.

Visitor expectations

Waldo Lake is one of those spectacular places that makes Oregon a special place to live. Located high in the Cascade Mountains, it's the second deepest lake in the state and has incredibly clear waters. The American people recognized the remarkable value of this area when Congress designated the land on three sides of the lake as Wilderness, and Oregonians followed suit by designating the lake itself as a Scenic Waterway – the only lake in all of Oregon with this honor.

This place has a passionate following among people seeking a quiet place where they can spend time with family and friends camping, paddling or sailing its pristine waters, and hiking or biking its shores. Waldo Lake is a unique setting and the tens of thousands of visitors over the years have kept it this way for a very long time, simply through their voluntary behavior and an informal "good neighbor policy."

These expectations are clearly reflected in a 2003 survey of visitors to the Waldo Lake basin¹. Over 75% of visitors agreed that motorized boating negatively impacts a primitive recreation experience. Almost 70% of respondents favored only allowing non-motorized boats or electric motors on Waldo Lake, and 86% favored controlling the level of noise from motorized recreation. These strong feelings for a quiet, non-motorized experience were not unique to visitors already relying on canoes, sailboats, and other non-motorized boats; land based users

¹ Forest Service planning documents related to Waldo Lake, including the 2003 Visitor Survey, are available here: <http://go.usa.gov/4RrA>



(campers, hikers and bikers) had equally strong feelings about their desire for a non-motorized experience.

The US Forest Service manages the lands surrounding the lake in support of these public expectations. We no longer allow chainsaws, generators, and other motorized uses in the undeveloped areas around the lake. This summer, we will begin talking with visitors about limits on the use of generators and chainsaws in our developed campgrounds around Waldo Lake – something unheard of anywhere else. Most visitors to this area, even in the developed campgrounds, do not want to hear the sounds of motors.

Boat and float plane use of the lake surface is managed by the State of Oregon. Last spring, the Oregon State Marine Board reaffirmed the social expectations of a non-motorized experience at Waldo Lake by banning the use of internal combustion motors on boats. Time and again, public policy has reflected public expectations that Waldo Lake is unique and it deserves a unique set of policies to protect what makes it special – the quiet experience that visitors to Waldo Lake have experienced for decades.

When conflicting uses are encouraged, as they would be if float planes were allowed to use Waldo Lake, user conflict is inevitable. This debate itself and the temporary rule that allowed float plane use last year has already led to increasing conflict between people at Waldo. As captured in a YouTube Video (<http://youtu.be/YZLYo5t2n5E>), a float plane landing last summer produced threats of violence from both “sides.”

Wilderness Impacts

The Waldo Lake Wilderness surrounds Waldo Lake on the north, west and south sides. Designated by Congress in 1984, the Forest Service is charged with managing the area so visitors have “outstanding opportunities for solitude or a primitive and unconfined type of recreation” (1964 Wilderness Act). The remaining lands around the lake, except for the developed campgrounds and boat launches, are designated as semiprimitive nonmotorized by the Willamette National Forest Land and Resource Management Plan.

Wilderness areas and “areas with wilderness characteristics,” (such as areas designated semiprimitive nonmotorized) are considered “noise sensitive” by the Federal Aviation Authority, which recommends avoidance of these areas if possible, and if not, flying 2000 feet above ground level (FAA Advisory Circular 91-36D).

Water Quality

One of the remarkable things about Waldo Lake is the incredibly clean and clear water; some claim that it’s one of the clearest lakes in the world, with visibility measured at over 100 feet deep. The purity of the water is in part due to the low inflow to the lake. While the risk of a fuel spill from float plane use is small, it can be avoided completely by banning float planes from the lake. With many other lakes in such close proximity where float plane use is permitted, we feel it isn’t worth risking one of the clearest lakes in the world simply to allow a very small number of folks to access the lake by floatplane. We believe taking this risk is not necessary nor in the public interest.

Preserving the incredible water quality of Waldo Lake is extremely important to the public. In our 2003 Waldo Lake Basin Visitor Survey, over 94% believe pollution from motorized boating needs to be controlled. In our Waldo Lake management planning efforts, almost 80% of the 350 responses we received included comments about protecting water quality.

Past float plane use

There are few records that indicate the past usage of Waldo Lake by float planes, but it is generally considered to have been few and far between, at least during the peak recreation period in August and September; last year, there were only six landings. We believe there were very few landings on the lake because pilots themselves avoided the lake, knowing that social expectations in the area were for non-motorized experience. Codifying float plane use now, when there has been little to no use in the past, seems to be a solution in search of a problem.

Through our Memorandum of Understanding, we recognize that the State of Oregon is taking the lead on managing boat and float plane use of Waldo Lake. We value our continued partnership with the State to ensure Waldo Lake remains a place where Oregonians, and all visitors, can come enjoy their public lands, leaving with an experience worth remembering. The long history of use at the lake and the social expectations of visitors show us that Waldo Lake deserves special treatment to ensure a non-motorized experience.

Sincerely,

/s/ Meg Mitchell

MEG MITCHELL

Willamette Forest Supervisor

cc: Mitch Swecker
Director
Oregon Department of Aviation