



www.americanwhitewater.org

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Forest Plan Revision
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414
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October 17, 2012

Dear Shoshone National Forest,

American Whitewater is a national non-profit organization dedicated to the protection and restoration of whitewater rivers, as well as their safe enjoyment. Our members are primarily conservation-oriented kayakers, canoeists, and rafters, some of which recreate on the spectacular rivers and streams of the Shoshone National Forest. We are pleased to have the opportunity to review your Draft Forest Plan.

On November 19, 2010, American Whitewater filed comments recommending several streams be found eligible for Wild and Scenic designation that had not been found eligible by the Shoshone National Forest (SNF) in a 2008 inventory, and that specific paddling related recreational values be recognized for numerous streams. On February 1, 2012, we refined and reiterated these comments as part of the overarching Outdoor Alliance comments. The Draft Forest Plan addressed some of our concerns, which we greatly appreciate. We have several procedural and resource-level questions and concerns remaining that we will voice in these comments, along with support for advances made with the Forest's treatment of rivers in the Draft Plan.

1. **Support for Deferral of Wild and Scenic Suitability:** The SNF has chosen not to immediately initiate suitability determinations for eligible Wild and Scenic Rivers, nor recommend any rivers for designation, until such time as these actions are triggered by proposed impacts or conservation actions. We support this decision as reasonable and protective of our interests in maintaining the values of eligible rivers that could lead to designation.
2. **Support for Updating Wild and Scenic Eligibility Inventory:** The SNF updated the 2008 Wild and Scenic River eligibility inventory in April of 2012. We requested this update because Forest Service policy and the public interest requires that these inventories be updated regularly during the planning process based on public input and other new information that arises through the planning process. We appreciate the SNF updating the eligibility inventory.

3. **Request for Greater Transparency in the Wild and Scenic River Eligibility Inventory:** The Wild and Scenic River eligibility inventory states that of all the streams on the Forest, twenty six were initially thought to potentially be eligible for Wild and Scenic designation. The public is left to wonder why streams other than those twenty six were discounted. The list of twenty six is then cut to thirteen in the inventory because of a perceived lack of Outstanding Remarkable Values (ORV's) of the remaining thirteen. Again, the public is left to wonder how this important decision was made and why. We request that the final Forest Plan include a stream-by-stream description of the analysis that lead to the thirteen findings of non-eligibility for streams previously deemed potentially eligible. We request that the analysis used to select the twenty six potentially eligible streams (and not select all others) be included as an appendix.
4. **Support for Finding Lower Sunlight Creek Eligible for Wild and Scenic Designation:** In our previous comments we requested that you find Lower Sunlight Creek eligible for Wild and Scenic designation. We greatly appreciate your recognition of this incredible stream's ORV's and eligibility in the Draft Forest Plan. We feel it is more than deserving of this protective status and recognition. The more we learn about this stream's remarkable scenic and recreational values the more confident we become in its eligibility.
5. **Request for Findings of Eligibility for Crandall Creek, North Fork Popo Agie, and Grinnell Creek.** We ask that you review our prior comments and find that the aforementioned creeks are eligible for Wild and Scenic designation. If you choose not to find these rivers eligible, please explain your rationale.
6. **Request for a Recreational Paddling ORV on Lower Sunlight Creek, Warm Springs Creek and the Wiggins Fork:** The Wild and Scenic river eligibility inventory does not find that a recreational paddling ORV is justified on Lower Sunlight Creek, Warm Springs Creek, or the Wiggins Fork. One needs only to look at the outstanding scenery that the Sunlight Creek gorge will reveal to paddlers traversing its length to realize what an incredible recreational experience Sunlight Creek offers. We believe that our prior comments have documented the recreational ORV's of these three streams to a sufficient extent, and we ask that the SNF list recreational paddling ORV's for each of the aforementioned streams. If you choose not to find that there is a clear recreational paddling ORV for any of these streams, please explain your rationale.
7. **Support for Recognition of Paddling Values:** The 2008 Wild and Scenic river eligibility inventory did not mention whitewater boating as a use and supportive ORV for the eligible streams. This omission was partially corrected in the 2012 inventory, and we greatly appreciate this update. Specifically, paddling values were appropriately mentioned for the Clarks Fork, Greybull, Middle Fork Popo Agie, North Fork Shoshone, and the South Fork Shoshone rivers.

On behalf of conservation-oriented whitewater paddlers, American Whitewater would like to thank you for considering our interests. It is clear that you read our previous comments, gave them some thought, and used the information in our comments to improve the Wild and Scenic river eligibility inventory. We now ask for greater

transparency in decisions to leave certain streams unprotected by the Wild and Scenic Rivers Act, and in some cases reconsideration of these decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "K. R. Colburn". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kevin R. Colburn
National Stewardship Director
American Whitewater