



www.americanwhitewater.org

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Re: Wild and Scenic River Designated Areas

Dear Clearwater and Nez Perce National Forests,

American Whitewater is a national non-profit organization dedicated to the conservation and restoration of our nations whitewater resources and to enhancing opportunities to enjoy them safely. We have an office in Missoula, Montana, and significant membership in Montana and Idaho. Importantly, we also have members from across the country that travel to the Nez Perce and Clearwater National Forests to enjoy paddling the Forests' incomparable rivers. We are pleased to participate in this forest planning process and to offer these comments on the treatment of designated and eligible Wild and Scenic Rivers.

Wild and Scenic River Management Plans

Comprehensive River Management Plans (CRMP's) were last published for the Selway, Middle Fork Clearwater, and Lochsa Rivers in 1969, followed by management guides in 1973. Thus, the current CRMP's are over 40 years old.

These plans were supplemented with Whitewater Management Plans for the Selway in 1976 and 1982, the Middle Fork Clearwater and lower Selway in 1986, and for the Lochsa in 1984 and 1995. These plans addressed only floating activities, leaving all other forms of recreation and uses managed under a separate context. The draft assessment notes numerous resource concerns relating to these other uses.

The Draft Assessment rightly states: "The existing River Management Plan is aged and does not meet the criteria established in Section 3 of the Wild and Scenic Rivers Act as amended in 1986. The plan lacks sufficient detail in several areas including monitoring, user capacities, and development plans."

We feel strongly that the new forest plan should include as appendices new updated Comprehensive River Management Plans for the Selway, Lochsa, and Middle Fork Clearwater rivers. These plans should consider visitor capacities with a fresh look, and should include opportunities for paddlers to descend Moose and Bear creeks into the Selway under special conditions and a backcountry permit (but not requiring a Selway lottery permit).

The draft components offer an objective to update plans within X years. We believe that it is far more efficient to update CRMP's during forest planning. However, if the Forests

move forward with a trigger for subsequent updates, we request this be required as a *standard*, and the timeframe be no more than 3 years.

Wild and Scenic Suitability Determinations

The Draft Assessment states on page 26 that Forest Planning provides the opportunity to revisit a stalled suitability determination that was initiated in 1995. Suitability determinations are relatively resource intensive analyses most often conducted in response to a proposed water resource or other natural resource development. These determinations, which include ever changing factors like politics, economics, and recreation, offer a snapshot of conditions at the time of the analysis. Many factors have changed since 1995, including recreational changes, rendering the analyses conducted then of questionable value. So too many factors may change in the future, specifically if or when salmon recovery becomes a reality, as recreation changes, and as climate changes.

While we have not yet reviewed the 1995 analysis, the outcomes of that analysis are strong indicators that the analysis was flawed. Bear Creek, Three Links Creek, Rhoda Creek, and the Forks of Moose Creek are nationally significant and unique streams. Each offers spectacular and remote paddling adventures that are extremely rare in the lower 48 states of the US. Each also offers incredible hiking and anadromous fish habitat. To release these from Wild and Scenic eligible status cannot be based on a robust analysis.

The draft components propose to complete the unfinished suitability determinations and additional suitability determinations within X years. *We ask that this component be deleted.* Suitability determinations are not timely or necessary on the Nez Perce or Clearwater National Forests. There are no active hydropower proposals that would conflict with eligible river status for these streams. Thus, we feel that the Forests should update their eligibility inventory and defer costly and unnecessary suitability determinations until they are warranted.

As a matter of policy, we have asked that the draft Forest Service Handbook and Manual also be modified to clearly state that suitability determinations are optional and best deferred until they are needed. It has long been USFS practice to defer suitability, and we find this to be environmentally responsible, consistent with the Wild and Scenic Rivers Act, and fiscally conservative.

Wild and Scenic Eligibility Inventories

The draft assessment contains the outline for an eligibility inventory, but lacks specific information for each stream. The final assessment should seek the type of information envisioned in the proposed Forest Service Handbook. Specifically, each stream should have information on what makes it special, potential Outstanding Remarkable Values, and if possible a photograph. We look forward to contributing to and reviewing this inventory.

The USFS recommended streams as eligible in 1987, 1990, 1995, and 2006. We support each of these findings, and suggest that other streams also warrant serious

consideration for their eligibility based at least in part on their outstanding and remarkable recreational value. We recommend the following rivers be formally considered for their eligibility, which are not presently considered eligible:

- Weitas Creek
- Big Sands Creek
- Storm Creek
- American River
- Red River
- Crooked Creek
- Warm Springs Creek
- Boulder Creek
- Old Man Creek
- Potlatch River
- Elk River
- Horse Creek

In addition, we fully support prior USFS inventories that found the following rivers and streams eligible.

- Bargamin Creek
- Bear Creek Complex
- Johns River
- Lake Creek
- Meadow Creek
- Moose Creek Complex
- Running Creek
- Salmon River
- Slate Creek
- SF Clearwater
- Gedney Creek
- Three Links Creek
- Whitebird Creek
- Kelly Creek
- NF Kelly Creek
- SF Kelly Creek
- Cayuse Creek
- NF Clearwater River
- LNF Clearwater River
- Lolo Creek
- Fish Creek
- Hungery Creek
- Mussellshell Creek
- Colt Killed Creek (White Sands)
- Upper Lochsa River

We highlight the values that we are aware of for each of these streams in our Eligibility Inventory, submitted separately. This inventory is meant to be a living document that we add to as we learn more about these incredible rivers and streams. We will continue to publish updates as our inventory grows in content, with the hope that this will help the Forests create a robust eligibility inventory of their own.

Thank you for considering these comments.

Sincerely,

Kevin Colburn
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