



www.americanwhitewater.org

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Submitted to: scnf_plan_rev@fs.fed.us

Re: Wild and Scenic River Eligibility Study

Dear Planning Team,

American Whitewater is a national non-profit organization dedicated to protecting and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely. Our members are primarily conservation-oriented kayakers, rafters, and canoeists. Our community has a long history of supporting the protection of rivers using the Wild and Scenic Rivers Act because dams have so profoundly impacted the rivers and streams whitewater paddlers especially cherish: the wild, steep, and boldly flowing ones. Wild and Scenic eligibility is a vital tool for setting some outstanding streams beyond the reach of hydropower developers until Congress can consider designation. In recent years American Whitewater has challenged numerous dams in Montana and Idaho, which serves as reminder that Wild and Scenic eligibility is both timely and important.

Positive Feedback

We would like to commend staff for showing their work on the Draft Eligibility Report, especially the detailed table in the Appendix. This makes it easier to understand and comment on their assessment of stream values. We would also like to voice our appreciation for your use of an ESRI story map, which is a great tool and almost essential for the public to understand proposed actions on big landscapes like the Salmon-Challis.

The streams proposed for eligibility in the Draft Report rank very highly in our opinion. It is clear, and appropriate, that staff made an effort to protect a suite of rivers that spans each mountain range and distinct part of the Forest. The streams proposed for protection are reasonable, defensible, form a representative system, and are all great streams.

Opportunities for Improvement

While the initial findings and some structural elements of the Draft Report are good, we have some suggestions for improvements as the process moves forward.

First, there is no link on the Salmon-Challis forest plan revision website to the Wild and Scenic Rivers content, making it very difficult for the public to find this content. There also appears to have been limited outreach to interested stakeholders (like American Whitewater), which may account for the very small amount of comments on the early stages of the report. Second, your websites are silent on deadlines for public comment, making the timeliness of participation unclear.

The report itself could be made clearer through the addition of an executive summary. The public will get lost in this 500+ page document. The report and mapping tools would also benefit from a more clear distinction between the newly proposed eligible streams and those previously deemed eligible. The public is interested in what will change under the new plan, and this will help. We strongly recommend that eligibility reports include photos of the streams, when available. While this step takes time and will not be comprehensive, it helps the public visualize the resources being discussed. Lastly, the small amount of public input shows in the report, which often relies heavily on remote sensing to assess streams. While understandable early in the process, we encourage future related work products to include more rich, place-based, first-hand information that is received from the public, organizations, and the ID team.

Process Error Notification Regarding Suitability

The Salmon-Challis Wild and Scenic eligibility documents offer unclear and contradictory information on whether or not, and at what stage of the process, the Forest intends to conduct what is called a “suitability” analysis in planning documents. The Draft Report indicates vaguely that “Any eligible river may be studied for its suitability for inclusion in the NWSRS at any time,” and the “Salmon-Challis National Forest intends to conduct its suitability study at some time following the completion of this eligibility study.” See pg. 4-5. The Wild and Scenic story map however states that the “Salmon-Challis National Forest will conduct a suitability study of eligible rivers as part of the Forest Plan process.”

The 2012 Forest Planning Rule requires forest plans to: 1) include an eligibility inventory,¹ and 2) protect both eligible and suitable (congressional study) rivers.² The Planning Rule therefore prohibits the Forest Service from taking any action as part of a Forest Plan revision or amendment that removes protective management from eligible streams. The Rule makes no mention of any process for culling eligible streams through a political analysis, which the Forest Service is calling “suitability” in this process. The Wild and Scenic Rivers Act empowers agencies to conduct “suitability” determinations only upon request from Congress.³

¹ 36 C.F.R. § 219.7(c)(2)(vi).

² 36 C.F.R. § 219.10(b)(1).

³ See Section 4(a) of the WSRA: “The Secretary of the Interior ... shall study and submit to the President reports on the suitability or nonsuitability for addition to the national wild

Eliminating protections for eligible streams based on a single arbitrary spot-check of ever shifting public and political views would erode the future of the Wild and Scenic River system by allowing harm to some of the last, best, irreplaceable free-flowing wild rivers in the United States.

American Whitewater requests that the Salmon-Challis National Forest defer suitability determinations indefinitely.

Comments on Specific Rivers and Streams

Bear Valley Creek (2)	Free-Flowing	ORV: S, F, R
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We agree Bear Valley Creek merits a scenery ORV and recommend that it also has a fisheries and recreational ORV. Bear Valley Creek is a primary – if not the primary - source of spawning salmon in the Middle Fork Salmon watershed. It is also a primary and beautiful paddling route into the Wild and Scenic Middle Fork of the Salmon River, and in fact forms the Middle Fork upon its confluence with Marsh Creek.



Loon Creek	Free-Flowing	ORV: S,G,C,F,W,R
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Loon Creek epitomizes a Wild and Scenic River. The hot springs along the creek are unique and are at least subjectively some of the finest in North America in terms of scenery, remoteness, and enjoyment. They draw countless paddlers up a well-maintained trail into the Big Loon valley from the Wild and Scenic Middle Fork Salmon each year. Hikers and hot spring goers enjoy a valley blanketed with balsamroot, larkspur, skyrockets, and other diverse wildflowers in May and June, and the impressive sight of Big Loon Creek carving its way beneath cliffs and ornate water-sculpted boulders. Elk sightings are common, and diverse wildlife signs are ubiquitous. Throughout the valley the sounds of Big Loon Creek rushing toward the Middle Fork for an omnipresent background to birdsong and no sounds of mankind save for the rare



and scenic rivers system of rivers which are designated herein or hereafter by *the Congress* as potential additions to such system.”

flyover. Middle Fork paddlers routinely hike up Loon Creek several miles with their kayaks and paddle the final gorge. The gorge offers paddlers the chance to paddle a wild and remote Class IV/V steep creek in a beautiful setting. The rock structure, formed by a mix of carved bedrock and huge boulders that appear to have fallen from above is unique and extremely desirable for the technical whitewater it creates.

See: <https://www.americanwhitewater.org/content/River/detail/id/573/>

Camas Creek	Free-Flowing	ORV: R,F
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Camas Creek is a big whitewater creek flowing through the arid canyon country characteristic of the Middle Fork Salmon's Impassable Canyon. Camas Creek offers paddlers a continuous descent through a beautiful landscape, and several big standout rapids that keep even very good paddlers on their toes. A trail popular with hikers and floaters offers recreational enjoyment of the Creek.



See: <https://www.americanwhitewater.org/content/River/detail/id/537/>

Horse Creek	Free-Flowing	ORV: F
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Horse Creek traverses a 14.6-mile canyon that drops 2,700 feet as a large stream between a high valley near its eponymous hot spring and the Salmon River. Over that course it transitions from the forest ecosystem typical of the Bitterroot Mountains to the canyon grasslands of the Salmon River valley. We strongly support the proposed fisheries ORV for Horse Creek, as well as a Scenery ORV.



Marsh Creek (A&B)	Free-Flowing	ORV: R,F
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Marsh Creek, more than any other tributary, is essentially the source of, and an extension of, the Wild and Scenic Middle Fork Salmon. Marsh Creek forms high in a subalpine meadow outside of Stanley, ID, before cutting a scenic path through the talus fields and forests of the mountains. Cold and snowbound in the spring and early summer, Marsh Creek is a vital



paddling route into the Middle Fork Salmon before the Boundary Creek road opens, and is a long and breathtaking day on the water for kayakers and rafters. Paddlers are treated to a remote Class III+ paddling experience that is suitable for a wide range of skill levels and craft, with attention-grabbing rapids alternating with slower sections allowing for sightseeing. Early in the season paddlers have the rare opportunity to paddle past snow-packed avalanche chutes that only weeks earlier spanned the river with their snow. The experience is humbling, and reminds paddlers of the high elevation of Marsh Creek, and the rugged and wild landscape they are entering. Marsh Creek paddlers seamlessly float onto the Middle Fork Salmon proper, noticeable only by the confluence of the slightly smaller Bear Valley Creek with Marsh Creek. Marsh Creek merits a recreational ORV in its own right as well as in its context as an extension of the Middle Fork Wild and Scenic River.

See: <https://www.americanwhitewater.org/content/River/detail/id/576/>

Panther Creek	Free-Flowing	ORV: S,R,F,W,C
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Panther Creek is a large stream in a remote but roaded arid watershed. Road access offers ample opportunities for paddling, fishing, hot spring soaking, and other activities. We support the Forest Service findings of eligibility.



See:

<https://www.americanwhitewater.org/content/River/detail/id/3089/#tab-photos>,
and

<https://www.americanwhitewater.org/content/River/detail/id/586/#tab-photos>

Rapid River	Free-Flowing	ORV: R,F
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The Rapid River offers Middle Fork paddlers a beautiful side hike, and 3-4 miles of extremely fun class IV paddling. We support the findings of eligibility.

See: <https://www.americanwhitewater.org/content/River/detail/id/605/>

Yankee Fork of the Salmon

Free-Flowing

ORV: R,F,C,G

The Yankee Fork is perhaps Idaho's best example of historic mining activities and impacts. A large old dredge remains, the mining town has been restored for interpretive purposes, and large sections of the valley are dominated by piles of mining-related cobble. The historical values associated with the stream are undeniable, and yet amidst all the impacts the stream still offers important fish habitat and an exciting and accessible intermediate whitewater run.



See: <https://www.americanwhitewater.org/content/River/detail/id/649/>

Conclusion

Thank you for considering these comments, and for your very solid work on the draft eligibility study. The remaining free-flowing streams in the Salmon-Challis National Forests are among the wildest and most spectacular streams in the United States. We ask that the Forest Service protect at least the rivers proposed in your Draft Eligibility Report as a system of outstanding rivers and streams set aside from future development.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Colburn', written in a cursive style.

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