



[www.americanwhitewater.org](http://www.americanwhitewater.org)

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October 3, 2016

Re: Flathead National Forest Draft Plan and DEIS Comments

Dear Flathead National Forest Planning Team,

American Whitewater is a membership-based nonprofit organization with a mission of conserving and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely. Our members are primarily conservation-oriented kayakers, canoeists, and rafters, and we have significant membership in Montana. We have had Montana-based staff since the mid-1990s, and have a depth of experience with the recreational, ecological, geological, and other values of streams on the Flathead National Forest.

American Whitewater is an active steering committee member of Montanans for Healthy Rivers (MHR). We have submitted scoping and other comments as part of this group. As part of MHR, we have spent the past 5-6 years having conversations with Montanans about the state's rivers and streams. We have found significant support for the conservation of streams' world-class water quality, fisheries, and recreational opportunities, and specifically for protecting these values with the Wild and Scenic Rivers Act (WSRA). Our comments on the Draft Plan focus on ensuring the WSRA is fully and accurately implemented in the new plan with regards to administrative findings of eligibility and management of eligible streams, as well as current and potential new designated streams.

American Whitewater is also a member of the Outdoor Alliance, a coalition of human-powered outdoor recreation groups that support responsible management of sustainable recreation and the conservation of places of recreational significance. In this context we are pleased to offer a few comments on the recreational plan components. Thank you for considering these comments.

### **1. Comments on Wild and Scenic River Eligibility Inventory**

The DEIS finds a total of 23 stream reaches to be eligible for Wild and Scenic designation, 11 of which are new recommendations in this planning cycle. We appreciate and support these findings, and find them to be well reasoned and based on significant compelling evidence. We offer additional information on several streams that we feel were wrongly found ineligible, and also additional information in support of additional Outstandingly Remarkable Values for specific streams.

## 1(a). Additional Streams We Recommend Be Found Eligible, & New Supporting Evidence

Upper Twin Creek

Free-Flowing

ORV: G,R,S

**Geology ORV:** Upper Twin Creek thunders over a 30+ foot tall waterfall through a limestone natural bridge. At one time in geologic history the natural bridge formed the lip of the waterfall, and over time the stream dissolved and/or eroded a hole upstream of the historic lip. The result is a stunning natural arch or land bridge that is unquestionably a “geologic feature, process or phenomenon that is rare, unique or unusual.” It is also a “textbook example” of a natural bridge that may have initially formed through cave erosion.



The karst topography of the region is strikingly highlighted in Upper Twin Creek’s inner gorge in features other than the natural bridge. Many solution cave mouths are located on gorge walls, some with active springs pouring out of them. Upper Twin Creek visitors can explore a very short distance inside of the mouth of one such cave and view calcite features. In



another location two large cave mouths are visible and inaccessible on the gorge walls. More prevalent are small cave mouths with springs and hanging gardens of plants clinging beneath them quite close to the water of Upper Twin Creek. Upper Twin Creek’s gorge itself is a karst feature with grottos and slot canyons reminiscent of caves, and in fact, portions of the gorge may have been cave passages in geologic history. We are not aware of any stream with this density of caves, springs, and other karst features in the region of comparison. We feel this stream is a “textbook example” of karst geology.

Based on this evidence, the evaluation rating of a 1 out of 4 in Table 5-6 of the DEIS with regards to Geology is in error. We feel this evidence strongly supports a rating of 4, and the finding that an ORV is justified.

**Recreation ORV:** A reasonable and level hike into Upper Twin Creek on the South Creek Trail grants kayakers and pack rafters access to Upper Twin's beautiful meandering middle valley. Before long, paddlers note the canyon walls rising up, see the first cave, and portage around the natural bridge. The plunge pool below the waterfall offers outstanding views of the natural bridge and falls. After one Class IV drop that is easily walked (or paddled) the river flows for several miles through a vertical walled limestone gorge. The limestone gorge eventually gives way to low walled gorges of red and blue/grey mudstone characteristic of the Crown of the Continent that creates excellent whitewater and scenery. The whitewater is very moderate, primarily class II with perhaps some class III, and is suitable for a wide variety of skill levels and ideal for pack rafting. The scenery is spectacular, and the experience of paddling past caves and through a gorge like this, interacting with the karst rapids, walls, and grottos, is unquestionably rare, unique, and exemplary.



Upper Twin Creek also has a trail that allows hikers to view the lower portions of the gorges, which broadens the ways that people can enjoy the gorge. Adventurous hikers can also reach the natural bridge from the South Creek Trail.

Thus, the geologic and scenic values of Upper Twin Creek can be appreciated by visitors of various skill levels and through a variety of activities. Upper Twin has the potential to attract visitors from around the region and nation, especially as a paddling destination. The evaluation report rating of a 2 out of 4 is in error based on this evidence, and we feel a rating of 4 is more than justified.

**Scenery ORV:** Descending Upper Twin Creek grants paddlers access to a unique, diverse, wild, and visually stunning river corridor. There are no signs of human influence in the river corridor. Even the trail in the lower gorge is not visible from the river, and the water quality is superb. Paddlers traverse an open valley with big views, the cave-studded pale limestone gorge with the natural bridge at its head, then a reddish orange limestone gorge, a series of red and blue-grey mudstone

gorges, and ultimately a short wooded reach below the final gorges. Upper Twin Creek meets and exceeds several of the USFS scenery criteria: the corridor is pristine, the visual features are diverse and exemplary, and there are views of outstanding geologic features. The evaluation report rating of a 2 out of 4 is in error based on this evidence, and we feel a rating of 4 is more than justified.

Upper Twin Creek is our highest priority for eligibility among the streams not found eligible in the DEIS, and is the very definition of a stream with Outstandingly Remarkable Values.

See a video of our 2016 descent that we submit herein as evidence of the stream's geological, recreational, and scenic ORVs: <https://vimeo.com/180327823>

See also: American Whitewater National River Database page for Upper Twin Creek: <http://www.americanwhitewater.org/content/River/detail/id/10916/>

Lower Twin Creek

Free-Flowing

ORV: R,S

**Recreational ORV:** Lower Twin Creek (an adjacent but different stream entirely than Upper Twin Creek) is the domain of hikers, horsepackers, and pack rafters that hike Trail 385 from the South Fork of the Flathead up and over the flanks of Crossover Mountain. The Class IV whitewater offered by Lower Twin Creek is a definite step up from Upper Twin Creek, and the over-mountain hike in will limit use. With this said, the stream is quite beautiful as it flows through the valley upstream of the gorge, and then open forests, talus slopes, and cliff walls as it cuts through the mountains on its way to the South Fork Flathead. Unlike Upper Twin Creek, Lower Twin Creek has no fish barriers so we assume there is greater fisheries movement between Lower Twin Creek and the South Fork of the Flathead River. We ask that the Forest reconsider the values of Lower Twin Creek.



**Recreational ORV:** Gorge Creek is probably the most popular front-country kayaking run in the South Fork Flathead watershed. Set in its dramatic namesake gorge and with numerous intermediate to advanced rapids, the creek has long been a favorite. The hike in on Trail 218 is relatively moderate, and offers paddlers a lot of bang for their buck in terms of whitewater. Evidence of recreational quality and interest can be viewed in the following linked video of the first open canoe descent: <https://www.youtube.com/watch?v=p4o3PGu9trs>

### **1(b). Additional Values We Recommend For Eligible Streams**

#### Elk Creek - Request for Recreational Paddling ORV

Elk Creek is a terrific whitewater run. A moderate 4-mile hike in on Trail 300 brings paddlers to a put on the swift blue waters of Elk Creek nestled in a dark forest, beneath the dramatic peaks of the Mission Mountains. Elk Creek and the Upper Swan are the only two creeks in the Missions in which downfall is not a major impediment to continuous paddling. The stream alternates between sections of very high quality Class III-V whitewater and open moose-browsed meadows, in which layer upon layer of complex log accumulations can be seen above and below the waterline of the meandering stream. The fish and wildlife habitat is incredible, as are the views offered to paddlers as they traverse the meadows. The outstanding recreational quality is made up of excellent rapids of a consistent difficulty, the lack of mandatory portages, minimal downfall in the whitewater reaches, the scenery and setting, the solitude, and the wildlife viewing opportunities.

#### Glacier Creek – Request for Recreational Hiking and Paddling ORV

National Forest Trail 708 parallels Glacier Creek and provides hikers with one of the most popular and accessible routes into the east side of the Mission Mountains. The trail offers view of scenic waterfalls on Glacier Creek and angling opportunities, and eventually leads to Glacier Lake and Turquoise Lake, which are integral facets of Glacier Creek. Glacier Creek also offers the most accessible and scenic creek boating in the Swan Valley, with an outstanding small Class III/IV waterfall located just a short and easy walk from the trailhead. Paddlers hike farther up for a series of fun bedrock slides and rapids, and continue downstream of the trailhead for a stretch of boulder rapids. Taken together, these recreational opportunities afforded by Glacier Creek are exemplary for their diversity, setting, scenery, and popularity.

#### Graves Creek – Request for Recreational Paddling ORV

Graves Creek offers paddling something truly rare, unique and exemplary: the chance to tackle a difficult staircase of waterfalls and slides set in challenging terrain and surrounded by gorgeous mountain views. As we've mentioned in previous

comments, Graves Creek is hard, and is among the most difficult rivers in Montana. While we recognize that Graves Creek is unlikely to be popular anytime soon, it fills a unique and important niche in regional recreation, comparable to capstone opportunities in other forms of outdoor recreation like difficult climbing routes, hiking trails, or ski descents. Just as regional mountaineering would not be the same without Granite Peak, so too regional paddling would not be the same without Graves Creek.

### Lower Swan - Request for Recreational Paddling ORV

The Lower Swan offers a family-friendly float trip through a wildlife-rich meandering river corridor, where visitors can experience the natural processes of a floodplain river in a dramatic setting. It is the most protected float trip on the Swan River of its kind, and merits recognition.

## **2. Comments on Wild and Scenic River Management Areas**

American Whitewater and our partners in Montanans for Healthy Rivers anticipate new additions to the Wild and Scenic River system on the Forest and look forward to working closely with Forest staff to support the creation Comprehensive River Management Plans. We feel the Management Area related to Wild and Scenic Rivers are generally good with the caveats noted below.

### Wild and Scenic Rivers: Management Area 2

- We request a new Desired Condition that states: “Streams found eligible are designated by Congress as Wild and Scenic Rivers,” and that the Plan convey that it is the intent of the Forest Service to work with the public and Congress to inform and support proposed designations.
- We request a new Objective that states: “Rivers and streams designated as new Wild and Scenic Rivers will have Comprehensive River Management Plans (CRMPs) completed within five years of designation. CRMPs for new Wild and Scenic stream reaches may be integrated into a revised CRMP for the Flathead Wild and Scenic River, and/or may be combined into a single CRMP with direction shared across similar streams.” It is our intent to work with the Forest to create an efficient CRMP development process that does not make the plans or future management more complicated than they need to be. Compared to large high-use rivers, CRMP’s for less-visited streams can and should be much simpler and may largely be comprised of crosswalks to existing Forest Plan components.

### Designated Wild and Scenic Rivers: Management Area 2a

- We request a new Desired Condition stating that designated rivers are managed based on up-to-date Comprehensive River Management Plans since

the current plans are over 30 years old, and an Objective that states CRMP's will be updated within 5 years of Forest Plan issuance.

- Please clarify that scenic and recreational river corridors are suitable for non-commercial firewood gathering under MA2a-SUIT 04, to the extent those activities do not degrade ORVs. Firewood is an important fuel source for many citizens and we feel its collection should be permitted under Section 10(a) of the WSRA that allows uses of corridors that do not "substantially interfere" with enjoyment of the ORVs.
- Please clarify that scenic and recreational river corridors are suitable for commercial communication sites and utility corridors under MA2a-SUIT 05 only to the extent those activities do not degrade ORVs.

#### Eligible Wild and Scenic Rivers: Management Area 2b

- We request a new Suitability standard stating: "Eligible stream reaches are not suitable for federally licensed hydropower projects."
- Please clarify that scenic and recreational river corridors are suitable for non-commercial firewood gathering under MA2a-SUIT 03, to the extent those activities do not degrade ORVs. Firewood is an important fuel source for many citizens and we feel its collection should be permitted under Section 10(a) of the WSRA that allows uses of corridors that do not "substantially interfere" with enjoyment of the ORVs.
- Please clarify that scenic and recreational river corridors are suitable for commercial communication sites and utility corridors under MA2a-SUIT 04 only to the extent those activities do not degrade the values for which the stream was found eligible.

### **3. Comments on Recreation Plan Components**

- a. Goal:** Recognize that paddling is a sustainable dispersed recreational activity that occurs across the forest.  
**Recommendation:** We ask that you add "paddling" or "floating" to the list of types of outdoor recreation to be available under Desired Condition FW-DC-REC 09 (Page 64, Draft Plan).
- b. Goal:** Proactively provide for sustainable recreation (as required by the forest planning rule).  
**Recommendation:** New Desired Condition: "Non-motorized recreation is promoted, allowed, and welcomed across the Forest in the places where it is sustainable, through the activities that are sustainable, and to the extent that it is sustainable."
- c. Goal:** Describe and value specific attributes of water-based recreation settings.

**Recommendation:** New Desired Condition under Recreational Settings:  
“Rivers and streams continued provide exceptional non-motorized boating, fishing, and swimming opportunities featuring excellent water quality and quantity, river corridors of intact native forest, scenic views, and opportunities to observe native biodiversity.”

#### 4. Conclusion

Thank you for considering these comments focused on how to accurately implement the 2012 Forest Planning Rule as it relates to Wild and Scenic Rivers and sustainable recreation. We view the Forest Service as a partner in implementing the Rule and are pleased to play a role in supplying data and other information that is difficult for the agency to gather. The paddling community has a deep collective knowledge of rivers and streams on the Forest and our experiences on these incredible waterways inspire our stewardship ethic. The streams on the Forest are some of the finest in the United States, and we are hopeful that the new Forest Plan will ensure that they remain so for future generations.

Sincerely,

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

Kevin Colburn  
National Stewardship Director  
American Whitewater