



Kevin Colburn  
National Stewardship Director  
P.O. Box 1540  
Cullowhee, NC 28723  
828-712-4825  
[kevin@americanwhitewater.org](mailto:kevin@americanwhitewater.org)

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

Nez Perce Clearwater National Forest

Submitted to: [fpr\\_npclw@fs.fed.us](mailto:fpr_npclw@fs.fed.us)

October 2, 2018 (The 50<sup>th</sup> Anniversary of the Wild and Scenic Rivers Act)

Re: Nez Perce Clearwater Draft Suitability Report Comments

### Introduction

American Whitewater is a national nonprofit organization with an emphasis on river conservation and access. Many of our members from across the United States enjoy paddling the rivers of the Nez Perce and Clearwater national forests (the Forests). The authors of these comments have personally explored many of the rivers on which the Forests now propose to remove Wild and Scenic eligibility protections. We worked hard to collaborate on the early phases of this forest planning process, and we have provided substantive comments throughout the process.

The Draft Suitability Report is critically flawed. First and foremost, conducting suitability determinations to remove eligibility protections as part of the planning process is not a legal practice. Even if it were, the Draft Report was inappropriately released before public comment was solicited - except for the forest-wide opinions of select local groups and political leaders which fill the pages. The Draft Report fails to connect the dots between the facts and opinions therein, and the differing conclusions represented by various alternatives. The Draft Report is unclear on what a finding of suitability or unsuitability will actually do. And the Draft Report is so full of redundant information and so lacking in design that it is difficult, and for most people will be impossible, to discern the differences between streams and the results of the analysis. We ask that the Forest Service cease the suitability process entirely. If not, we ask that the Draft Report be withdrawn and resubmitted after public comment is solicited and considered. If neither of these steps are taken, we ask that all eligible streams be found suitable and ORVs expanded, with special attention granted to our eligibility report and these comments as evidence of merit and support.

### Comments On Issues Throughout The Draft Report

Support or Opposition to Designation Are Prematurely Analyzed: The Report contains a section on support or opposition to designation, yet the Agency *has never asked the public* for their

opinion on designation. Prior requests for comment were specific to eligibility. Eligibility is limited to consideration of the values of the rivers, and does not include support or opposition to designation. Responses to Question 11 in the Draft Report are based on a biased query of local interests to the exclusion of everyone else. The Draft Report is thus premature, misleading and inappropriate.

Unsuitable Streams Will Remain Eligible: Even if the Forest Service moves forward with this process the Forests are calling “suitability,” the Forest Plan must protect the values that could lead to designation of all 89 eligible streams under the 2012 planning rule.<sup>1</sup> The Segment Suitability Determination tables should thus be changed to reflect that “Not Suitable” streams are in fact “Eligible but Not Suitable.” As we note exhaustively in prior comments, conducting a “suitability” analysis as part of forest planning is inappropriate and illegal.

No Rationale is Provided: There is no rationale provided for why each stream was found suitable or not by alternative. There are a series of site specific facts, some local opinions, and then results, without any connection made between the facts found and the decision reached.

American Whitewater Comments Are Largely Ignored: Certain organizations and entities are cited as offering support or opposition for designation, yet our significant and data-rich comments are not referenced in the Report, and the content of our comments is often ignored or dismissed in the Report. We are attaching our eligibility report as additional evidence for suitability.

Timber Harvest is Wrongly Characterized: The Report estimates that timber harvest “may be curtailed” in the Wild and Scenic corridor, including in recreational reaches. We refute this assumption. There are many examples of timber sales in eligible corridors, and timber harvest is not forbidden in such corridors so long as it does not diminish or significantly interfere with the values that could lead to designation. Especially onerous, the Report claims that restoration objectives involving timber harvest may be unreachable, which runs counter to the “protect and enhance” mandate of the Wild and Scenic Rivers Act.

Private Lands Acquisition is Wrongly Characterized: The Report claims on rivers flowing partially over private lands that Congress may direct the Forest Service to pursue acquisition private land within the corridor. This statement should clarify that condemnation is expressly forbidden under the Wild and Scenic Rivers Act where ownership is majority public. Any purchase would almost certainly be at the discretion of the Agency and a willing seller. The Report seems to create a threat of condemnation of private lands that is not reasonable.

IDPR Programs and Policies Are Unclear: The Report states that designation is inconsistent with IDPR programs and policies. Please cite those programs and policies, provide links, and explain the inconsistency.

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<sup>1</sup> See: 36 C.F.R. § 219.10(b)(1)(v)

Idaho County Plan Issues Are Not Appropriate: The statements credited to the Idaho County Natural Resources Plan infer that many eligible stream corridors are already over regulated by an accompanying list of other acts, and that any protections payed forth under the Wild and Scenic Rivers Act will cause some sort of significant destabilization or damage to the area. Such unsubstantiated claims should not be included or considered as relevant to the merits of suitability determinations in a document operating in conjunction with the Wild and Scenic Rivers Act itself.

Collaboration is Granted Too Much Emphasis: Please provide a link to the Clearwater Basin Collaborative letter to Forest Supervisor Cheryl Probert dated March 14, 2018 regarding Wild and Scenic Suitability that is cited throughout the Draft Report. The CBC does not have a river conservation or recreation group in its membership as we understand it, and the CBC does not represent or reflect American Whitewater's and our members' interests, nor the vast support of the American people for the Wild and Scenic River System. We infer that the CBC letter is too general to merit substantive consideration regarding individual streams. More importantly, the letter apparently does not represent consensus recommendations - it is a collection of individual and conflicting opinions. Why is this letter given so much weight and space in the Report? American Whitewater participated in the Forest Service led collaborative effort several years ago, and that significant effort seems to have offered no influence to this report.

Opposition Comments Are Not Reasonable: Opposition comments repeated throughout the report are not reasonable or persuasive. Rivers need not be held to the standard of past and current designated streams - this is a ridiculous standard. The Wild and Scenic Rivers Act expressly provides for the addition of new streams which serves as evidence the authors' envisioned subsequent designations. Dams are entirely possible on streams in this area.<sup>2</sup> Limits on timber harvest would be minimal, and part of a balanced Forest Plan.

Elimination of Redundant Content is Essential: We request that a second version of the Draft Report be released that does not include vast redundancy of boilerplate language, and that includes summary tables of findings and results. Question 11 is a great example, but not the only one, of large scale redundancy. The Draft Report could be a quarter of the length and much easier to understand with a better design and less redundancy. It is a very difficult document to understand in its current state.

Roadless Area Management is Contradictory: The Report states under Question 3 for streams in Roadless Areas that that "No changes are anticipated to land use..." and that "timber harvest would be foreclosed [on over some number of acres]." Which is it? Will there be less logging or not? We would also like an explanation of how the stated conflict between the Idaho Roadless Rule and the Wild and Scenic Rivers Act (i.e. "any measures required to protect ORVs may affect the ability to restore or enhance wildlife habitats") can be reconciled as it is followed by the acknowledgment that, "a wide variety of wildlife species, both those that are river

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<sup>2</sup> See: [https://nhaap.ornl.gov/sites/default/files/NHAAP\\_NSD\\_17.png](https://nhaap.ornl.gov/sites/default/files/NHAAP_NSD_17.png). Also See: [https://nhaap.ornl.gov/sites/default/files/ORNL\\_NSD\\_FY14\\_Final\\_Report.pdf](https://nhaap.ornl.gov/sites/default/files/ORNL_NSD_FY14_Final_Report.pdf)

dependent and those that are not, have habitat within the river corridor and would benefit from protections provided through the Wild and Scenic River Act.”

Segment Suitability Determination Tables Conflict with Alternatives: The tables at the end of each river segment do not match the Alternatives Document. Of the 47 listed sections, 28 lack any suitability under all alternatives in the suitability tables. This is very confusing, and the actual results of the suitability report is nearly impossible to discern. Does the Forest think each river is suitable or not? The report does not say.

Photos are Needed: Where possible, especially for scenic and recreational values, the Report should include more photographs.

### Comments on Specific Rivers In The Draft Report

#### 1. Clearwater Basin

##### a. Potlatch River

- i. The recreational description is sound, and we appreciate the acknowledgement of the recreational paddling values of the reach.
- ii. The Report ignores our comments in response to section 11. American Whitewater filed specific comments on why the Potlatch River is special and should be found eligible - not just general comments asking for all rivers to be protected.
- iii. We strongly challenge the assertion in the Report that *“Additionally, the recreation ORV may conflict with the safety interests of various agencies, including the Forest Service Palouse Ranger District. This river is seen by the as dangerous due to private property infrastructure (such as barbed wire fences crossing the river) and difficulty accessing it legally. As such, Nez Perce-Clearwater National Forests Wild and Scenic River Suitability Report promotion of this use may not be in the best interest of the American people. Recognition of the early season boating opportunity in this unique canyon may lead to future dialogue with other landowners.”*

These claims fly in the face of USFS policy, accepted river management practices, and the Wild and Scenic Rivers Act. These claims should be struck from the final report.

First and foremost, the Forest Service Manual is clear that “The manager's role in safety is advisory and informational. Provide opportunities for the river recreation user to become informed of current river flows, equipment and experience minimums and hazards. The user must make the final decision about whether or not to engage in the

recreation activity.”<sup>3</sup> The Forest Service should not discourage use of this river or determine it is “unsafe” based on opinions of staff.

Second, Recreation is an Outstandly Remarkable Value - this is a good thing - that is inherently in the public interest. To claim that this value is in fact a negative thing that should be ignored and in fact threatened because agency staff “see” the river as dangerous is runs directly in opposition of the agency mandates under the Wild and Scenic Rivers Act to protect and enhance recreational values, not to mention the 2012 Forest Planning Rule which requires the agency to provide for sustainable recreation.

Third, The Potlatch Canyon is not unusually dangerous. It is a moderate Class IV run, especially if paddlers make the easy portage around Coleman Falls (which is not a waterfall and only drops a handful of feet). The Forest Service actively manages and promotes recreation on much harder and more dangerous rivers. As for the threat of fences, landowners should not be putting dangerous fences across navigable streams, and boat passable fences are an easy solution to any conflicts in that regard. Any such fences are not on Forest Service land and are thus not part of this forest plan. Fences do not render a river unsuitable, or even necessarily unsafe. There has never been a paddling fatality on this reach. We challenge the determination that the river is too dangerous to protect.

- iv. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
- v. American Whitewater requests that this river be found suitable if the Forests move forward with a suitability process in order to protect the values American Whitewater identified in our comments on eligibility. Eligibility or designation is vitally important to protect and enhance the Recreation ORV through protecting scenery, water quality, access, and importantly free flowing condition.

## 2. North Fork Clearwater Basin

### a. North Fork Clearwater River

- i. We ask that the Forest Service reveal the methodology for determining the acres on which timber harvest “may be curtailed” and the basis for those conclusions. We believe this conclusion may not justified given that timber sales are not prohibited in Wild and Scenic corridors, and that ecological restoration is a core facet of protecting and enhancing Wild and Scenic River corridors.

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<sup>3</sup> See Forest Service Manual 2354.41b - Water Safety.

- ii. We appreciate the acknowledgement of the whitewater resources on the North Fork Clearwater.
  - iii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the interests of the paddling community in protection of this river.
  - iv. American Whitewater requests that this river be found suitable if the Forests move forward with a suitability process in order to protect the values American Whitewater identified in our comments on eligibility.
- b. Bostonian Creek, Boundary Creek, Caledonia Creek, and Graves Creek
  - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process to protect their fisheries values.
- c. Cave and Chateau Creek
  - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process to protect their scenic and other values.
- d. Weitas Creek
  - i. American Whitewater requests that Weitas Creek be found suitable if the Forests move forward with a suitability process to protect its recreational and fisheries value, and we request also that paddling values be added to the Recreation ORV description. Please refer to our eligibility comments for specific content.
- e. Cliff Creek, Falls Creek, Lost Pete Creek
  - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process to protect their geologic and other values.
- f. Elk Creek
  - i. American Whitewater requests that this river be found suitable if the Forests move forward with a suitability process in order to protect the values American Whitewater identified in our comments on eligibility.
- g. Beaver Creek, Elmer Creek, and Isabella Creek
  - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process to protect their fisheries and other values.
- h. Cayuse Creek, Kelly Creek, North Fork Kelly Creek, Middle Fork Kelly Creek, South Fork Kelly Creek
  - i. We ask that paddling be added to the recreation ORV description for Kelly and Cayuse Creek based in part on our eligibility comments.
  - ii. American Whitewater requests that these rivers be found suitable if the Forests move forward with a suitability process in order to protect the values American Whitewater identified in our comments on eligibility, including exceptional whitewater paddling opportunities.
- i. Little North Fork Clearwater

- i. Thank you for recognizing the paddling values of this river reach as being a core facet of the Recreation ORV.
    - ii. 26.6 miles is eligible, so why are only 3.5 miles being considered for suitability.
    - iii. American Whitewater requests that this river be found suitable if the Forests move forward with a suitability process in order to protect the values American Whitewater identified in our comments on eligibility, including exceptional whitewater paddling opportunities.
  - j. Lake Creek (NF Clearwater).
    - i. American Whitewater requests that this river be found suitable if the Forests move forward with a suitability process in order to protect the fisheries and other values.
- 3. Middle Fork Clearwater River Basin
  - a. Clear Creek and South Fork Clear Creek
    - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries and other values.
  - b. Lolo Creek
    - i. We appreciate and support the recognition of the well-deserved whitewater paddling related Recreation ORV.
    - ii. We respectfully would like to respond to the Commissioner's opposition to designation regarding increased use and search and rescue costs. Lolo Creek is a well known whitewater paddling resource and is featured in all relevant guidebooks and websites used by paddlers. It is a long run, is challenging, and is fairly remote from populations centers. In short it is exemplary but it is not for everyone. Studies have shown that Wild and Scenic designation does not necessarily increase use, and in this case we feel strongly that the vast majority of people capable and interested in paddling Lolo Creek are already enjoying the stream, and that designation would not increase use. Even if there was a small increase over time (which may happen with or without designation) we don't foresee such increases in use significantly increasing search and rescue operations which are minimal among Class IV and V paddlers. We'd also like to point out that recreational visitation can offer an economic benefit to the region. We know from experience that paddlers take off Lolo Creek hungry, and often drive straight to a restaurant for a celebratory meal.
    - iii. American Whitewater requests that this river be found suitable if the Forests move forward with a suitability process in order to protect the values American Whitewater identified in our comments on eligibility, including exceptional whitewater paddling opportunities.
  - c. Musselshell Creek
    - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the cultural and other values.

#### 4. Lochsa River Basin

- a. Canyon Creek, Glade Greek, Lowell Creek, and Rye Patch Creek
  - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the wildlife and other values.
- b. Upper Lochsa River, Colt Killed Creek (formerly known as “White Sand Creek”), Big Sand Creek, Storm Creek, North Fork Storm Creek, and South Fork Storm Creek.
  - i. We dispute the claims that whitewater paddling on Colt Killed Creek is a seven mile run suitable only for “extreme kayakers,” that it requires a 2 mile hike in, and that it does not merit an ORV for recreation. In fact, the run is 12 miles long, is car-top accessed at the end of FR359, and is only a Class III-IV run of comparably or lesser difficulty than the popular Wild and Scenic reaches of the Lochsa downstream.<sup>4</sup> One does not need to be extreme or hike in to paddle Colt Killed Creek, though we note many Wild and Scenic Rivers offer class V whitewater that is viewed as an ORV. We assume the ID Team mistook the more challenging upper reach of Colt Killed Creek for the lower. This stream is a natural extension of the Lochsa Wild and Scenic River, as is Big Sands Creek. These streams provide a range of recreational opportunities that directly connect with the Lochsa, and are often enjoyed by Lochsa paddlers. They offer dramatic scenery, solitude, and wonderful rapids and wildlife viewing opportunities. Paddlers see mountain lions and other wildlife on these trips, which would be less likely on the roadside reaches downstream. We request that the Forest Service add a whitewater boating related Recreation ORV to Colt Killed Creek and Big Sands Creek.
  - ii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the recreation, scenery, fisheries, wildlife and other values.
- c. Crooked Fork Creek, Brushy Fork Creek, and Hopeful Creek
  - i. Why is there no suitability in any alternative under the Segment Suitability Determination for Brushy Fork Creek and Hopeful Creek?
  - ii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, wildlife, cultural, recreational, and other values.
- d. Fish Creek and Hungery Creek
  - i. Fish Creek meets any reasonable standard for a recreation ORV. It is a beautiful stream often paddled as a unique and exciting start to Lochsa River descents. For many paddlers, it is an inseparable part of the Lochsa paddling experience - and that experience should be recognized and protected through a recreation ORV. It is the most accessible and

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<sup>4</sup> See: <https://www.americanwhitewater.org/content/River/detail/id/646/#main>



straightforward tributary of the Lochsa for paddlers to enjoy, and is an important recreational resource.

- ii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, wildlife, recreational and other values.
- e. Huckleberry Creek
  - i. The Wild and Scenic Lochsa is a special place and offers a special and often diverse recreation experience. Stanley Hot Springs is certainly a unique, rare, and exemplary facet of many paddling trips to the Lochsa, and that experience merits protection and recognition as an ORV and through designation.
  - ii. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the hot spring related Recreation ORV.
- f. Warm Springs Creek
  - i. The Wild and Scenic Lochsa is a special place and offers a special and often diverse recreation experience. Jerry Johnson Hot Springs is certainly a unique, rare, and exemplary facet of many paddling trips to the Lochsa, and that experience merits protection and recognition as an ORV and through designation. In addition, rare descents of Warm Springs Creek have delighted paddlers for well over the past decade, including descents of “Moose Drool Falls” pictured in the Suitability Report. We appreciate the inclusion of the photograph.
  - ii. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the hot spring related Recreation ORV, as well as the scenic and geology ORVs.
- g. ‘Imnamatnoon Creek and Waw’aalamnime Creek
  - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, wildlife other values.
- h. Old Man Creek
  - i. Old Man Creek is a storied, rugged, beautiful and trailless canyon that has perplexed paddlers for decades. It is a special place, and views up the canyon from the Lochsa are a delight for paddlers.
  - ii. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the scenic other values.
- i. Lake Creek (Lochsa Subbasin)
  - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, and other values.

## 5. Selway River Basin

- a. Bear Creek, Cub Creek, and Brushy Fork Creek

- i. The lack of recognition of the formerly noted Recreation ORV for Bear Creek and its tributaries completely ignores the fact that these corridors are used for such purposes. In our 2013 Eligibility Report we specifically highlighted Bear Creek as a unique means of entering the commonly paddled Wild and Scenic Selway River via hiking, boating, and/or fishing. To mention the “high scenic quality” of these creeks as “some of the larger tributaries in the Selway Basin” within the Draft Report, and to not acknowledge a river trip beginning with a hike from the Bitterroot crest at the top of Lost Horse Creek, is to simply turn away from recreational use in the area. We ask that the Recreation ORV be remembered and weighed as an important portion of the suitability of these streams.
  - ii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, cultural, scenic, wildlife, and other values.
- b. Gedney Creek and West Fork Gedney Creek
- i. The failure to acknowledge recreation as an ORV in the Draft Report ignores our admission of the corridor being visited by paddlers and other users. One means of experiencing the stated scenic value of Gedney Creek is through paddling an aesthetic gorge above its confluence with the Wild and Scenic Selway River near Selway Falls. The recreational values of these stream corridors should be included in their eligibility status.
  - ii. We ask that justification be given for how “the wild designation would foreclose timber harvest as an option for vegetation restoration,” given that timber harvest is not prohibited in Wild and Scenic corridors, and that ecological restoration is a core facet of protecting and enhancing Wild and Scenic River corridors.
  - iii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iv. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, scenic, and other values.
- c. O’Hara Creek
- i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, and other values.
- d. Meadow Creek, East Fork Meadow Creek, and Buck Lake Creek
- i. We appreciate the acknowledgment of the significant Recreational ORV found within the Meadow Creek corridor and the many opportunities provided by the Meadow Creek National Recreation Trail.

- ii. The unique combination of good accessibility, moderate difficulty, lack of necessity for permit, and incredible scenery afforded to whitewater paddlers on Meadow Creek should be included within the Recreational ORV as impetus for designation.
  - iii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iv. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, scenic, and other values.
- e. Moose Creek, North Fork Moose Creek, West Moose Creek, East Fork Moose Creek, Rhoda Creek, and Wounded Doe Creek
  - i. Moose Creek and its tributaries should be considered for designation for their scenic, cultural, and fisheries ORVs, but they should also be recognized for other recreational attributes. Remarkable opportunities for true multi-day wilderness whitewater, hiking, and horseback trips abound above the historically significant Moose Creek Ranger Station.
  - ii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the cultural, fisheries, scenic, recreational, and other values.
- f. Running Creek
  - i. Running Creek should also be considered for its Geologic ORV, as it contains a hot springs at Warm Springs Bar, a unique occurrence in the area.
  - ii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iii. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, geologic, scenic, and other values.
- g. Three Links Creek and West Fork Three Links Creek
  - i. Along with the Scenic ORV of Three Links Creek and the West Fork, it should be also granted a Recreational ORV. Paddlers experience a run through giant boulders, bedrock rapids, and cedar groves in a primitive location.
  - ii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, scenic, and other values.

- h. Glover Creek
    - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the wildlife and other values.
- 6. South Fork Clearwater River Basin
  - a. American River
    - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the the important salmon spawning habitat, fisheries, wildlife, and other values.
  - b. Johns Creek, Gospel Creek, and West Fork Gospel Creek
    - i. Johns Creek and its tributaries provide hikers, anglers, and boaters with a relatively pristine watershed to explore in an area that has seen significant extractive use.
    - ii. Seeing as there is suitability under the Segment Suitability Determination for Johns Creek under Alternative A and Z, why is there no suitability in any alternative for West Fork Gospel and Gospel Creeks?
    - iii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
    - iv. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, scenic, and other values.
  - c. Meadow Creek (SF Clearwater River)
    - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, cultural, and other values.
  - d. Mill Creek
    - i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the wildlife and other values.
  - e. Red River
    - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the the important salmon and steelhead fisheries, wildlife, recreational viewing of such and other values.
  - f. Silver Creek
    - i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the cultural, wildlife, and other values.
  - g. South Fork Clearwater River
    - i. We strongly refute the claims that the South Fork Clearwater, “is more of an opportunistic run which does not draw people to the area,” and “boaters are not likely to bypass the Lochsa River or the Salmon River to

run the South Fork Clearwater River, so boating is not considered as contributing to the ORV.” The Golden Canyon section and subsequent Mickey Mouse section are frequently visited with specific intent. A simple search of the internet yields many videos, images, and descriptions of these sections. The South Fork Clearwater tends to see many boaters looking to step-up in difficulty from the Lochsa arriving in the early Spring and into the Summer. The South Fork Clearwater also is featured in a popular curated guidebook called the River Gypsies’ Guide to North America featuring only the best whitewater runs in each region.

- ii. To reference the popularity and qualities of other Wild and Scenic Rivers in the area is flattering, but when used in an attempt to discredit those of another with potential for designation is stepping outside the scope of analyzing each stream based on its own merits. Simply because the Lochsa and Salmon have favored whitewater stretches, one cannot assume such is rendered null on the South Fork.
- iii. The statements provided in this section of the Draft Report blatantly show a lack of inclusion or consideration for American Whitewater, our 2013 Eligibility Report, and the whitewater community.
- iv. We appreciate the accurate highlighting of the Steelhead fishing resource and its contribution to the Recreation ORV.
- v. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
- vi. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect this substantial whitewater resource along with its recreational, scenic, fisheries, geologic, and other values.

h. West Fork Crooked River

- i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, scenic, and other values.

7. Salmon River Basin

a. Allison Creek

- i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the cultural, wildlife, and other values.

b. Bargamin Creek and Sabe Creek

- i. At the mouth of Bargamin Creek where it enters the Salmon River is a popular camp spot frequently visited by some of the thousands of individuals boating the Wild and Scenic Main Salmon from Corn Creek down. The well established trail that follows the creek as it heads towards

- the Magruder Corridor lends itself to enjoying the scenery by means of boating, swimming, hiking, and fishing.
- ii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, recreational, scenic, and other values.
- c. Big Mallard and Noble Creek
- i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the geologic, fisheries, scenic, and other values.
- d. South Fork White Bird Creek and North Fork White Bird Creek
- i. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - ii. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the historic, fisheries, and other values.
- e. Salmon River
- i. We appreciate the depth and accuracy given to the Recreation ORV on this section of the Salmon River. The vastness of whitewater opportunities available and utilized in this section are only complemented by its cliffs and sandy beaches.
  - ii. The long standing suitability of this run paired with its popularity makes a very strong case for its eligibility and designation.
  - iii. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - iv. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the recreational, scenic, fisheries, wildlife, geologic, historic, and other values.
- f. Slate Creek
- i. We ask that the Forest Service reconsider the factual basis for suitability outlined in our 2013 Eligibility Report (attached), and weigh the broad support of the paddling community for designating this river.
  - ii. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries, geologic, cultural, and other values.
- g. South Fork Squaw Creek and Papoose Creek
- i. American Whitewater requests that these streams be found suitable if the Forests move forward with a suitability process in order to protect the geologic, wildlife, and other values.
- h. Van Buren Creek

- i. American Whitewater requests that this stream be found suitable if the Forests move forward with a suitability process in order to protect the fisheries and other values

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Colburn", with a long horizontal flourish extending to the right.

Kevin Colburn  
National Stewardship Director  
American Whitewater  
PO Box 1540  
Cullowhee, NC 28723  
kevin@americanwhitewater.org

James Hepburn  
American Whitewater  
Northern Rockies Resource Expert