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Re: Forest Products Modernization - Batch 2 #ORMS-2747

Dear US Forest Service,

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,200 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the thousands of miles of exemplary whitewater rivers and streams flowing on the National Forest System. A significant percentage of American Whitewater members enjoy kayaking, canoeing or rafting on nearly every sizable stream on the National Forest System every year. We have reviewed the proposed changes to the Forest Service Directives, and write to request that Knutson-Vandenberg funding for dam construction be struck from the proposed Directives.

FSH 2409.19, Chapter 10, Section 13.61; and FSH 2409.19, Chapter 20, Section 21.3 both wrongly propose to allow and fund new dam construction under Knutson-Vandenberg (K-V) authority. K-V authority does not allow or envision K-V funds to be utilized for the construction of dams on the National Forest System. Construction of dams is not restoration or reforestation related, nor is it in any way related to timber harvest. At least one primary purpose of Directives is to accurately define the boundaries of line officers' decision space, and in this case the proposed Directives fail to do so. The proposed Directives would thus exceed the legal bounds of the authority and allow for approval of controversial dam building projects that would attract and fail legal review.

The proposed Directives cite policy support for construction of dams under K-V authority, including P. L. 92-367, that is unpersuasive and incorrect. This policy does not provide for the construction of new dams with K-V funds, nor does any other.

Funding dam construction would compound rather than mitigate timber harvest effects on habitat and watershed health. Dams block or hinder passage for a wide array of aquatic organisms, increase stream temperature, interrupt sediment and woody debris transport, and

create unnatural habitat that often favors invasive species. In addition, low head dams pose a serious drowning hazard for recreationists, can block recreational navigation, eliminate natural river recreation resources, and permanently mar natural scenery with industrial infrastructure. These well-documented multi-use, multi-species, long-term impacts overwhelmingly negate any potential benefit of new dam construction, and render dam construction unsuitable for use of K-V authority and funds.

To be clear, dam removal is ecosystem restoration, dam construction is not. We request that allowing K-V funding of dam construction be struck from the proposed Directives.

Sincerely,



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