



May 25, 2022

Scott Bosse, Northern Rockies Director
American Rivers
321 East Main, Suite 408
Bozeman, MT 59715

Custer Gallatin National Forest
Beartooth Ranger District
6811 Highway 212 South
Red Lodge, MT 59068

Re: Comments on East Rosebud Creek River Values Report

Dear East Rosebud Creek Planning Team,

On behalf of American Rivers, thank you for providing the opportunity to comment on the River Values Report for East Rosebud Creek that will inform the upcoming Comprehensive River Management Plan (CRMP).

ABOUT AMERICAN RIVERS

American Rivers believes a future of clean water and healthy rivers everywhere, for everyone is essential. Since 1973, we have protected wild rivers, restored damaged rivers and conserved clean water for people and nature. With headquarters in Washington, D.C. and 300,000 supporters, members and volunteers across the country, we are the most trusted and influential river conservation organization in the United States, delivering solutions for a better future.

American Rivers has more than 6,000 members and supporters in Montana, many of whom live by East Rosebud Creek and/or recreate on the creek on a regular basis. Our Northern Rockies office played an instrumental role in working with the local community and Montana's congressional delegation to get East Rosebud Creek added to the National Wild and Scenic Rivers System in August 2018. In fact, it was American Rivers and our partners at American Whitewater and the Greater Yellowstone Coalition that first proposed designating East Rosebud Creek as a Wild and Scenic River shortly after a hydropower dam was proposed below the outlet of East Rosebud Lake in 2009.

COMMENTS ON RIVER VALUES

American Rivers commends the Custer Gallatin National Forest (the Forest) for the exceptional level of detail in its River Values Report, including excellent photos and maps. We agree with the region of comparison that the Forest selected, which is defined as the Greater Yellowstone Area and the Pryor Mountains. We also concur with the Forest that the wild (upper) reach of East Rosebud Creek has outstandingly remarkable scenery, geology and recreation values, and the recreational (lower) reach has outstandingly remarkable scenery and geology values. Finally, while other important values exist

along both the wild and recreational segments of East Rosebud Creek, we agree that those values do not rise to the level of outstandingly remarkable within the region of comparison.

We do, however, believe that in addition to possessing outstandingly remarkable scenery and geology values, the recreational (lower) reach of East Rosebud Creek also possesses an outstandingly remarkable recreational value due to its well-deserved reputation as a whitewater paddling mecca. American Whitewater, the nation's premier whitewater conservation organization, has this to say about East Rosebud Creek downstream of East Rosebud Lake:

*"East Rosebud Creek is perhaps the best Class V creek on the east side of the Montana Beartooth mountain range. Many would argue that this distinction belongs to Big Timber Creek. But the character of the East Rosebud is significantly different from Big Timber. Big Timber is an unbelievable run with huge drops, but is pure "huck your meat." East Rosebud, on the other hand, offers 3 miles of continuous, non-stop Class 5 without any big falls. If you enjoy continuous Class 5 and you are confident you can run it without rolling, the East Rosebud is unbelievably fun. If you roll more than a few times, you probably are not going to enjoy this run."*¹

CONCLUSION

In closing, American Rivers commends the Forest for its exceptionally well detailed and very informative River Values Report, and we recommend that recreation be added as an outstandingly remarkable value (ORV) in the recreational (lower) reach. We look forward to collaborating with community members, other conservation and recreation groups, and the Forest as it begins the process of crafting the inaugural East Rosebud Creek CRMP.

Sincerely,



Scott Bosse
Northern Rockies Director
American Rivers
sbosse@americanrivers.org
(406) 570-0455

¹ <https://www.americanwhitewater.org/content/River/view/river-detail/1019/main>