



5.31.22

Custer Gallatin National Forest
Beartooth District Ranger Ken Coffin
6811 Hwy 212
Red Lodge, MT 59068

Re: River Values Report East Rosebud Creek Wild and Scenic River

Dear Beartooth District Ranger Ken Coffin,

Thank you for the opportunity to provide public comments on the River Values Report for East Rosebud Creek Wild and Scenic River. The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, MT with offices in Idaho and Wyoming and over 90,000 supporters from across the country. Our mission is to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem, now and for future generations.

GYC was integrally involved in the designation of East Rosebud Creek as a Wild and Scenic River (WSR) through the passage of the East Rosebud Wild and Scenic Rivers Act (Public Law 115-229) in 2018. Our efforts included conducting a review of East Rosebud Creek's eligibility for WSR status, published in November of 2017, which we are thankful to see referenced in the River Values Report. This perspective, along with nearly 40 years' experience working in the ecosystem, makes GYC uniquely positioned to provide relevant information about East Rosebud Creek's values and the pressures threatening to degrade those values.

As Montana's first new WSR designation in 42 years, East Rosebud Creek's Comprehensive River Management Plan (CRMP) stands not only to secure a promising future for one of the state's premier free-flowing rivers, but also to set good precedent for all future WSR protections that may be designated in the future. In order to address the Forest Service's primary interests for this comment period, we have organized our comments under the topics of 1. River Values; and 2. Current Conditions.

RIVER VALUES

The River Values Report for East Rosebud Creek lists river segment classifications that are in line with both the East Rosebud Wild and Scenic Rivers Act as well as GYC's Report on Recommended Wild and Scenic Rivers on the Custer Gallatin National Forest. We therefore support these boundaries and classifications:

- A 13-mile wild segment beginning at East Rosebud Creek's headwaters in the Absaroka-Beartooth Wilderness and ending at the inflow of East Rosebud Lake.
- A 7-mile recreational segment beginning immediately below the outlet of East Rosebud Lake and ending where the creek first enters private property.

GYC agrees with the Forest Service's assessment and findings regarding East Rosebud Creek's outstandingly remarkable values (ORVs) of scenery and geology for the entirety of the 20-mile WSR designation. The creek's Alp-like scenery features stunning waterfalls, expansive alpine vistas, a glacial valley, and varied, beautiful vegetation. Likewise, its geology is diverse, unique, and visually remarkable. We also agree with a recreation ORV along East Rosebud's wild segment seeing as the Beaten Path trail and other recreational opportunities afforded by the creek are some of the most acclaimed in the entirety of the Absaroka-Beartooth Wilderness. These values make East Rosebud Creek a truly exemplary river even amidst the myriad of remarkable waterways found in the Greater Yellowstone Ecosystem.

However, GYC urges the Forest Service to expand East Rosebud Creek's recreation ORV throughout the entirety of the WSR designation, including the recreational segment. The River Values Report lists a number of recreation opportunities between the outflow of East Rosebud Lake and the private land boundary, including picnicking, camping, fishing, and whitewater paddling, but did not determine these activities to be unique within the region of comparison. We feel that these recreational activities are indeed unique due to their relative quality compared to the region of comparison - particularly the quality of whitewater paddling as well as camping/picnicking opportunities at the Jimmy Joe and Sand Dunes areas. We also wish to highlight the nearby rock-climbing opportunities found at "The Ramp", which is described as "one of, if not the best easy-moderate trad climbs in Montana" (<https://www.summitpost.org/the-ramp-5-8/774724>). These outstanding recreation opportunities are all further enhanced by the ease of equitable public access from East Rosebud Road, especially for those unable to travel into the Creek's wild segment.

CURRENT CONDITIONS

Although East Rosebud Creek maintains relatively high water quality and good habitat for fish and wildlife today, GYC sees two primary threats to the river's values. These are the collective impacts of increasing recreational use and climate change. It is vital that the CRMP address these threats not only as they present themselves today, but also in the more drastic forms they are likely to assume in the future.

East Rosebud Creek's outstanding values, particularly its opportunities for high-quality recreational experiences, have earned this waterway regional acclaim as a destination for both local community members and visitors. Hiking, backpacking, fishing, whitewater kayaking, rock climbing, and camping all bring in high numbers of recreators, especially given the creek's accessibility from urban centers like Red Lodge, Billings, and even the Bozeman/Livingston area. Like so many other popular recreation hot spots in the Greater Yellowstone Ecosystem, the number of annual visitors has skyrocketed in recent years with no signs of slowing down. The River Values Report listed a 112% increase in traffic at East Rosebud Trailhead in 2020 as compared to 2013. Given the steep upward trend in recreation within the ecosystem, GYC suspects that recreational use numbers are significantly higher in this location today. We view the impacts of outdoor recreation as one of the primary threats to East Rosebud's water quality and ORVs.

One prominent and measurable example of recreational impacts is fecal water pollution. We are encouraged to see that the River Values Report acknowledges the existing impacts of improperly discarded human waste on water quality in East Rosebud Creek. While the Montana Department of Environmental Quality lists no current water quality impairments on the 20-mile WSR segment, the River Values Report states that the most recent water quality monitoring was conducted by DEQ in 2018 despite the policy being to monitor biennially in even-numbered years. This 2018 data, then, should be considered outdated. Given the widespread presence of fecal coliform and *E.coli* within the Absaroka-Beartooth Wilderness confirmed by the Pendegraph 2019 University of Montana study, impacts of human waste on East Rosebud Creek's water quality should come as no surprise.

In order to better understand and adaptively manage the impacts of human recreation on East Rosebud's WSR segments, more extensive and ongoing monitoring efforts are required. These monitoring efforts should examine both cause and effect – meaning, both the recreation itself and its ecological impacts.

Regarding recreation monitoring, high-resolution, up-to-date information is sorely lacking in the ecosystem. GYC conducted a comprehensive review of scientific literature related to outdoor recreation and its impacts in the Greater Yellowstone Ecosystem in 2018, titled: Recreation Impact Science Applications to the Interagency Visitor Use Management Framework (attached). While we found substantial evidence for recreation's impacts to various environmental resources, we also found a troubling lack of information or consensus on how recreation trends are changing in Greater Yellowstone. Nowhere is there greater need to quantify changing recreational use patterns than in popular hot spots like East Rosebud Creek. Effective recreation monitoring must quantify where recreation is occurring in proximity to the WSR segment, how demand levels are changing year to year, and what form(s) recreation is taking in various locations.

Increased water quality monitoring, particularly for fecal water pollution, should be paired with recreation data to identify and address areas where impacts are occurring. The River Values Report includes a dead link (404 error) to the four monitoring sites used by the MT DEQ, but water quality monitoring should be conducted regularly throughout both the wild and recreational river segments themselves.

While GYC recognizes the considerable challenges that come with regular, quantitative, area-specific monitoring of recreation and water quality, we view such efforts as essential for managing long-term recreational impacts to East Rosebud Creek. The CRMP must provide management direction for East Rosebud Creek's true needs, regardless of what activities and strategies are currently feasible. Should the Forest Service have insufficient resources to conduct necessary monitoring work, partnerships with groups like GYC and various private entities may help fill this need. Therefore, the CRMP should institute improved recreation and water quality monitoring practices and set impact thresholds that trigger appropriate management responses by the Forest Service.

The impacts of climate change on East Rosebud Creek represent another key concern for GYC, particularly for water quality. Fortunately, East Rosebud's high elevation source, north aspect, and steep slope angle give it relative resilience to climate change. The River Values Report acknowledges this abundance of cold-water refugia present in the creek's wild segment. This is a key aspect of East Rosebud Creek's water quality and one that must be recognized and maintained.

While climate refugia found along the creek's wild segment may not currently be considered an outstandingly remarkable example compared with similar rivers found within the region of comparison, this may not always be the case. The Greater Yellowstone Climate Assessment (<http://www.gyclimate.org/>) quantified a number of concerning shifts in Greater Yellowstone's climatic cycles when compared to conditions in 1950, including 2.3°F warmer temperatures, 25% loss of snowpack, and peak runoff occurring 8 days earlier. By the year 2100, our average annual snowpack is expected to reduce by 40%. As climate change and other forces degrade cold water refuges elsewhere in the ecosystem, East Rosebud Creek may one day prove outstandingly remarkable for this value. The CRMP should acknowledge the overall scarcity and ecological importance of the cold-water refugia present in the wild segment and manage to maintain it.

CONCLUSION

The Greater Yellowstone Coalition thanks the Custer Gallatin National Forest for considering our comments on East Rosebud Creek's River Values Report. This document will serve as the foundation for the CRMP, and as such it is vital for East Rosebud's long-term preservation. Should the Forest

Service have any questions regarding our comments, please do not hesitate to reach out to us directly. We look forward to participating in the upcoming Scoping and Proposed Action comment period and ask to be kept updated as the process unfolds.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Cruz', with a stylized 'R' and 'C'.

Ryan Cruz

Montana Conservation Associate

Greater Yellowstone Coalition