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Submitted electronically to: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=57341>

Re: Bitterroot Front Project

To Whom it May Concern,

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. With over 7,000 members and 80 local-based affiliate clubs, we represent approximately 80,000 whitewater boaters across the nation. American Whitewater's mission is to conserve 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 ecological well-being of the rivers and streams flowing through the Bitterroot Front, as well as their recreational value. A significant number of our members reside within a reasonable driving distance from the Project and/or travel to this area for recreation. We offer the following comments.

1. The Project Affects Whitewater Recreation, Which Should Be Considered In Greater Detail.

Appendix B of the EA describes a recreation inventory that will be completed and used to minimize impacts on recreational users.¹ Rivers used for paddling are not explicitly captured as a category on the checklist, but we ask that it be added. If not, we request that paddling be named as an example under "Unique Special Areas." Specifically, paddling is most common on the following streams, and paddling experiences on these streams should be explicitly considered and protected.

- a. Kootenai Creek: Kootenai Creek is by far the most popular of the Bitterroot creeks, and is an important recreational resource. A short hike-up from the trailhead offers paddlers a nearly continuous series of unique rapids and a small waterfall. Kootenai Creek appears to be largely in an Inventoried Roadless Area that we assume is less likely to be affected by the Project. See: <https://www.americanwhitewater.org/content/River/view/river-detail/3726/main>
- b. Big Creek: Big Creek below the trailhead offers paddlers a run that is easier and more accessible than other streams on the Bitterroot Front. The Project proposes

¹ EA, Appendix B, Pg. 22.

a mosaic of prescribed burn treatment which may benefit the stream. Use of this section is likely low, but has potential to grow. See:

<https://www.americanwhitewater.org/content/River/view/river-detail/11596/main>

- c. Bear Creek: Bear Creek is an iconic paddling trip in the Bitterroots, drawing people from around the region to its Class V rapids and slides, including the scenic trailside Brave Bear Rapid. Paddlers hike up from the trailhead to reach the put-in, paddle the steep run, and then hike out to the trailhead to avoid a strainer-filled section just above the trailhead. Bear Creek is the run most likely to be affected by the Project as the final 0.75 miles or so of the run is near to scheduled immediate commercial harvest. It appears that the Forest Service may have excluded the river corridor from this management regime and instead is proposing prescribed burning for the stream corridor, but this is not entirely clear. We would like to see this more corridor management explicitly stated, and we support a less intensive form of management to the river corridor, such as prescribed burning. See:
<https://www.americanwhitewater.org/content/River/view/river-detail/3226/main>
- d. Rock Creek: Rock Creek is a delightful short whitewater run located just upstream of Lake Como. Boaters paddle up the reservoir and then hike a mile and a half upstream to put in. What follows is a very high quality series of large waterslides and drops back to the Lake. Rock Creek appears to be largely in an Inventoried Roadless Area that we assume is less likely to be affected by the Project. See:
<https://www.americanwhitewater.org/content/River/view/river-detail/11076/main>

We ask that these rivers and others be considered for their paddling-related and other recreational values in the design and implementation of the Project, and that impacts to scenery and access be avoided. We ask that American Whitewater, and suggest that the Love Boat paddling shop and the Trailhead in Missoula, be contacted as communication partners regarding paddling related effects. We note that streams in the Bitterroot Front are often runnable for a very narrow window of time each year that could be as little as a week or two in duration, typically in the late April through early July timeframe. Avoiding closures during these times would help minimize access impacts on paddlers.

2. The Project Inadequately Considers Wild and Scenic Eligible Streams.

The EA states “ There would be limited changes to ORVs and WSR classifications in the long term for Blodgett and Lost Horse Creeks.”² In fact, the Forest Service is charged with managing eligible streams in a manner that protects these values and classifications. We are unsure what is meant by “changes” in this statement, but it raises a question as to whether the Forest Service intends to protect and enhance the values and classification of the eligible streams. We ask that the EA clarify this matter and commit to protecting these streams from degradation.

² EA, Pg. 56.

Thank you for considering these comments and the interests of whitewater paddlers.

Sincerely,

A handwritten signature in black ink, appearing to read "K. R. Colburn". The signature is fluid and cursive, with a long horizontal stroke at the end.

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