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March 27, 2024

Lolo National Forest Supervisor's Office
c/o Amanda Milburn, Plan Revision
24 Fort Missoula Rd.
Missoula, MT 59804
Submitted to: SM.FS.LFNRevision@usda.gov

Re: Lolo National Forest Plan Revision Proposed Action

Dear Lolo National Forest,

Thank you for this opportunity to comment on proposed action for the Lolo National Forest plan revision.

About American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 7,000 members and 80 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. We have ample membership, volunteers, and project-work in Montana and specifically in the Lolo National Forest area, and staff are active members of the River Management Society. For over a decade we have worked with partners to advocate that sections of Montana rivers become federally protected as a Wild and Scenic River, most recently and currently through the Montana Headwaters Legacy Act. I have personally lived and paddled extensively in Montana for many years, including on numerous streams on the Lolo National Forest.

Comments

American Whitewater filed comments on the Wild and Scenic River Draft Framework and Inventory in 2022 and we are pleased to see some elements of our information and interests represented in the proposed action. Specific to your treatment of Wild and Scenic Rivers, we feel that you have done a good job of navigating the process, and have made some smart and well-informed additions to the eligible stream roster. We offer these comments to help hone the proposed action into a stronger document that fills in a couple omissions.

Strengths

We appreciate that the Forest does not plan to conduct a suitability analysis on Wild and Scenic eligible streams during planning, which is consistent with the 2012 Planning Rule and the approach taken by other National Forests in the region and elsewhere.

You generally did a good job of describing the rivers, and documenting your success in managing eligible rivers over the years to protect their values so that they have maintained their eligibility.

The choices you made in adding eligible streams to the list are very good ones. In our last comments we provided information to support eligibility for Monture Creek, Lodgepole Creek, and Straight Creek and appreciate that you agree these streams should be eligible for a wide array of values. It is likewise good that you've found small sections of the Blackfoot eligible to align with the BLM findings, Lolo Creek to recognize newfound historical significance, the West Fork of the Thompson River, the North Fork of Fish Creek, Rock Creek, and more of Morrell Creek for well-documented values.

These streams and process considerations are very important to our organization and community, and we appreciate the Forest's work on these matters.

Requests for Changes

- **Slightly expand the Wild and Scenic eligible length of the North Fork Blackfoot River**

We would like to reiterate our request that the Forest extend the Wild and Scenic eligible reach of the North Fork Blackfoot¹ downstream a mile or so to the Cooper-Blackfoot Rd bridge to encompass the entire whitewater run and to include the especially beautiful canyon in this reach. While the river about a mile upstream of the trailhead and above (currently eligible) is generally in an open valley characterized by talus fields and long views, the lower section drops into a highly scenic canyon that more than merits eligibility. The eligible reach currently and inexplicably ends in the middle of this lower canyon. Because of the difficult nature of hiking out where the current eligible reach ends, recreational paddling use essentially always continues to this bridge, and the whitewater paddling in the canyon section is exceptional. All of the ORV's of this river do not stop at the trailhead, but rather continue down to the bridge where the river changes character. Please extend the eligible reach downstream to near the bridge, based on the presence of continuous ORVs through this section.

- **Find Fish Creek eligible for Wild and Scenic designation**

¹ <https://www.americanwhitewater.org/content/River/view/river-detail/986/main>

While we recommended several rivers for eligibility that were not selected by the Forest Service, we'd like to highlight Fish Creek² for a reconsideration of an eligibility finding. The fisheries and recreational values of Fish Creek are truly exemplary. The stream offers excellent water quality, miles of fun class II+ paddling, and ample coldwater habitat for its namesake fish. The Forest Service rightly recognizes the many values of the headwaters, and we feel those values extend continuously to the Clark Fork River. I have paddled and snorkeled Fish Creek several times and can attest that it is a great resource on par with the Blackfoot in terms of recreational value. We ask that the Forest take another hard look at Fish Creek with an eye to connectivity, fish habitat, and recreation.

- **Integrate river paddling into the proposed action**

The proposed action is essentially silent on river paddling as a use and value of the Forest, except for a passing mention regarding the Blackfoot and Lower Thompson. We understand that river paddling is not substantially different from other forms of dispersed recreation like hunting, fishing, backcountry skiing, hiking, etc and therefore is often covered by more general recreational categories. We also recognize that the very high quality of river paddling in Montana is not always represented by large amounts of use that is obvious to the Forest Service. In the Wild and Scenic Rivers Eligibility Study however, the activity is important to mention as a component of recreational ORV's and existing uses.

The most important omission of paddling that we ask be remedied relates to the North Fork of the Blackfoot (pictured), which is one of the premier hike-in whitewater runs in the Northern Rockies.³ We ask that paddling values be recognized in the Wild and Scenic Rivers Eligibility Study. As we share in our prior comments this river offers miles of sparkling bluish water flowing through Class III and IV rapids in a remote and scenic valley. It is a true classic. In addition, we ask that the paddling values of the large and scenic Clark Fork River, the popular canoe trail on the



² See: <https://www.americanwhitewater.org/content/River/view/river-detail/1001/main>

³ See: <https://www.americanwhitewater.org/content/River/view/river-detail/986/main>

Clearwater River, the hike-up from town Rattlesnake Creek⁴, the perfect learning environment of the Dalles of Rock Creek, and the high-adventure and wildly scenic Monture Creek⁵ be recognized. Paddling is one of the main ways that people connect with these and other rivers on the Forest, and we ask that the Forest recognize that connection through at least mentioning the activity as a component of the ORV's and existing uses.

Thank you for considering these comments, and the interests of the paddling community in wild free-flowing rivers and streams.

Sincerely,



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⁴ See: <https://www.americanwhitewater.org/content/River/view/river-detail/10236/main>

⁵ See: <https://www.americanwhitewater.org/content/River/view/river-detail/11197/main>