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Comments: Please see attached comment letter. The attached letter has also been emailed directly to mlnfplanrevision@fs.fed.us.

REVIEW ENTIRE LETTER

American Whitewater appreciates the opportunity to submit comments on the Forest Service[rsquo]s Draft Revised Forest Plan for the Manti-La Sal National Forest. At this time, American Whitewater has limited our below comments to the Wild and Scenic River Report. We look forward to submitting additional comments on the preliminary draft plan later in the public comment period.

About American Whitewater

American Whitewater is a national 501(c)(3) non-profit organization with a mission [ldquo]to conserve and restore our nation[rsquo]s whitewater resources and enhance opportunities to enjoy them safely[rdquo]. With over 6,200 individual and 100 affiliate club members, American Whitewater represents the interests of over 80,000 river enthusiasts. As conservation-minded whitewater recreationists, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our membership and the general public highly value our nation[rsquo]s river systems and associated riparian zones, and we have a direct interest in maintaining healthy rivers for everyone to enjoy. There are multiple stream segments within the Manti-La Sal National Forest that attract our members from across the region and the country, and we support management actions that protect and preserve healthy riparian systems and support unique recreational opportunities on these streams.

Introduction

To be eligible for inclusion in the National Wild and Scenic Rivers System, a stream must be free-flowing and have at least one [ldquo]outstandingly remarkable value[rdquo] (ORV) that is regionally or nationally significant. 1 These ORVs are specific, place-based values associated with recreation, scenery, geology, history, fisheries, culture, and other types of values. On National Forests, eligibility is important as it ensures interim protection for these very special rivers and streams until they can be formally designated by Congress or by the Secretary of Agriculture.

The Wild and Scenic Rivers Act (WSRA) was signed into law in response to the nation[rsquo]s dam building efforts. In Utah, there are over 380 significant dams, including numerous dams within the Manti-La Sal National Forest. 2 As climate change and population growth continues to stress water resources in an already arid state, measures must be taken to ensure that the Forest[rsquo]s free-flowing and outstanding remarkable streams are protected in perpetuity. A robust inventory of each stream[rsquo]s eligibility for Wild and Scenic designation is both justified and required by law.

American Whitewater appreciates the work that the Forest Service has done thus far on the Draft Forest Plan and the Wild and Scenic River eligibility evaluation. However, the inclusion of a single eligible Wild and Scenic stream segment, totaling 1.2 miles, is disappointing and severely disregards the intent of the 1968 WRSA. The Manti-La Sal Wild and Scenic River Report fails to recognize numerous rivers that are both free-flowing and possess at least one ORV. The eligibility phase of the Wild and Scenic Rivers Act is designed to be broad, with only two qualifications. American Whitewater asks that the Forest Service complete a more robust Wild and Scenic eligibility review and consider every river segment that is both free-flowing and has at least one ORV;

there are many such streams within the Manti-La Sal National Forest. In the following comments, we have identified broader issues with the Draft Wild and Scenic River Report and we offer specific recommendations for additional eligible river segments within the Manti-La Sal.

General Comments

Only eligibility and preliminary classification should be carried out by the Forest Service The Manti-La Sal Wild and Scenic River Report (Draft Plan, Appendix D) states on Page 33 that the Forest [ldquo]intends to conduct a suitability study at some time following the completion of this eligibility study.[rdquo] American Whitewater asks the Forest Service to focus their energy on producing a robust Eligibility Report supported by public input and strong data; a Forest Service Suitability Study is neither needed or required. The 2012 Forest Planning Rule requires forest plans to: 1) include an eligibility inventory 3 and 2) protect both eligible and suitable (congressional study) rivers. 4 Neither the 2012 Rule or the Wild and Scenic Rivers Act make any mention of a process to remove interim protections for streams that are determined eligible through the Forest Planning process. In fact, Suitability studies should only be completed under the direction of Congress. 5

Stream segments previously found eligible should be determined eligible again

For reasons outlined above, the 2008 Suitability Study is not in line with the WSRA nor with the 2012 Planning Rule and should have no impact on the current eligibility evaluation on the Manti-La Sal. Stream segments found eligible in 2003 should remain eligible unless significant changed circumstances have been identified that cause the segment to lose its free flow character or ORVs. Rather, changed circumstances have occurred that support additional ORVs (see next comment). Therefore, instead of limiting the scope of the eligibility study it should be further expanded.

All river segments studied in 2003 should be reassessed for the presence of any and all ORVs

The current eligibility study only reassessed Fish and Wildlife ORVs on river segments that were studied for eligibility in 2003. There is no justification for this limited scope and the Forest Service should reassess every 2003 study segment for all potential ORVs. Many other ORVs have had changed circumstances in the past 17 years, including the Recreational ORV. On Page 1-3, the Study Process report defines changed circumstances as [ldquo]those in the river or corridor that have affected the free-flowing nature or the presence of an ORV[hellip] including recognizing the river for certain recreational opportunities[rdquo]. Paddling on the Manti-La Sal has become significantly more popular since 2003. This is demonstrated by the addition of multiple Manti-La Sal streams to American Whitewater[rsquo]s National Whitewater Inventory, including Cottonwood Creek, Ferron Creek, Left Fork of Huntington Creek, and Huntington Creek. 6 Additionally, there has been increased discussions on online paddling forums including American Whitewater and Mountain Buzz regarding these creeks. These factors provide justification for a changed circumstance for the Recreational ORV and this is only considering the changes to the activity of paddling; many other recreational activities have increased in popularity in stream corridors within the Manti-La Sal and there have undoubtedly been additional changed circumstances that affect other ORVs.

Multiple scales should be used for the Region of Comparison (ROC) in order to recognize ORVs, not exclude them

The Manti-La Sal Final Eligibility Study Process report identified the ROC for the Recreational and Fish ORVs as the [ldquo]HUC 6[rdquo]. The use of this nomenclature is incorrect and should be clarified to read [ldquo]6 digit HUC[rdquo], as HUC 6 commonly refers to the 12-digit sixth level HUC. The 6 digit HUC basin scale should not be the only ROC considered and additional geographic scales should be used. The 1999 Report from the Interagency Wild & Scenic Rivers Coordinating Council (IWSRCC) concludes that the region(s) of comparison needs to include multiple scales and that [ldquo]In addition to regional or statewide comparison,

values must also be considered from a national perspective. For example, while multiple species of anadromous fish are relatively common in rivers on the Mt. Baker-Snoqualmie NF this association of multiple species is uncommon nationally.[rdquo] 7 Guidance from the IWSRCC encourages using ROCs that support eligibility findings rather than limit them and given the importance of ROCs for ORV evaluation, it is imperative that the Manti-La Sal plan revision process use this guidance. While four river segments with paddling opportunities are located within the same 6-digit HUC, there are no other paddling opportunities on the Forest, making these recreation opportunities very unique and raising them all to the level of Outstandingly Remarkable.

Additional data resources should be used to evaluate the Recreational ORV

The list of data resources used to evaluate the Recreation ORV should be revised and expanded. The current list is limited in scope and excludes numerous recreational activities. American Whitewater[rsquo]s National Whitewater Inventory is considered to be the most robust database for whitewater river segments in the United States and should be used as a direct reference for evaluating the Recreational ORV. 8 In addition to general internet searches, river segments and surrounding areas should be searched for on recreation specific websites, such as MountainBuzz. These more detailed searches are much more likely to discover reports and discussions about the river segments in the Manti-La Sal National Forest.

Comments on Individual River Segments

American Whitewater appreciates the identification of Duck Fork Creek as eligible for Wild and Scenic River designation and we support eligibility for the Duck Fork Creek segment. However, numerous stream segments that qualify for eligibility have been overlooked. American Whitewater provides the following segment-specific eligibility recommendations to inform the Wild and Scenic River Report and the Draft Revised Forest Plan for the Manti-La Sal National Forest.

SEE LETTER SUBMISSION: Photograph. Kayaking Cottonwood Creek at low water with the bouldering route, [ldquo]The Angler[rdquo], in the background. Photo Credit: Greg Lee, American Whitewater Board Member

Cottonwood Creek below Joe[rsquo]s Valley Reservoir has numerous ORVs, including exceptional recreation opportunities. The river corridor provides world class bouldering and unique whitewater kayaking opportunities. Between the reservoir and the Forest Service boundary the river is generally free-flowing with no impoundments, and in most years flows are sufficient to support kayaking. While there are no impoundments in the river segment, a state highway parallels the river corridor and there are multiple developed recreation sites. Cottonwood Creek should be determined eligible with a preliminary classification of Recreational and ORVs of Recreation, Scenery, Archeological, and Ecological.

* Segment: Joe[rsquo]s Valley Reservoir to USFS boundary
* Length: 2.8 miles
* Free-flowing: Yes. Cottonwood Creek is free-flowing between Joe[rsquo]s Valley Reservoir and the USFS boundary. There are no documented impoundments or manmade structures in the river and reservoir operations mimic the natural flow regime to the extent that flows are highest during spring runoff, decrease during the summer, and winter base flows exist the rest of the year. 9
* Preliminary Classification: Recreational. Utah State Route 29 parallels the entire river segment and there are developed recreation sites in the vicinity of the put-in for the paddling segment.
* ORVs:
* Recreation: Outstanding fishing, rock climbing, and paddling opportunities all support a Recreation ORV on Cottonwood Creek. The stunning turquoise waters support brown trout, cutthroat trout, and rainbow trout and the canyon has been acknowledged as one of the top five fall fishing destinations in Utah. 10 Climbing on boulders directly within the river corridor has gained national attention in recent years. The boulder problems have been

carved by the river and provide a very unique experience of bouldering from the river. The area has been featured in the Reel Rock film series and the national revolution of bouldering as a sport has been attributed to the boulder problems found in and around Cottonwood Creek. 11 The Creek provides unique paddling opportunities for a diversity of craft types, including whitewater canoes, packrafts, and kayaks (see Film section below). Whitewater paddling opportunities are rare in the Manti La Sal and paddling Cottonwood Creek has been featured on multiple online forums and in American Whitewater[rsquo]s National Whitewater Inventory. 12 The turquoise colored water elevates the popularity and unique value of the river for all types of river-dependent recreation.
* Scenery: The river corridor is set within stunning canyons and alcoves framed by the Elk Ridge and Abajo Mountains. The river water is turquoise in color in contrast to many other muddy rivers in Utah, attracting paddlers, sightseeing tourists, rock climbers, and other visitors. While the river is in the vicinity of a state highway the canyon walls hide the road from view and provide a more remote viewscape.
* Archeology: Pictographs and petroglyphs exist in the river corridor. Ecology: The river and its corridor provide habitat for exemplary flora and fauna. The river supports multiple trout fisheries, including brown trout, cutthroat trout, and rainbow trout.
* Online Resources:
* AW River Inventory Page/Photo Gallery: Cottonwood Creek (Straight Canyon)
* Film:

* Packrafting, 2017
* Kayaking, 2017
* Kayaking, 2011
* Canoe, 2016
* Kayaking, 2013

* Online forums:

* Mountain Buzz :
* Mountain Buzz is [ldquo]A forum community dedicated to whitewater kayaking, boating, and rafting enthusiasts.[rdquo] A search for [ldquo]Joe[rsquo]s Valley Cottonwood Creek Utah[rdquo] produces over 460 discussion topic results.

SEE LETTER SUBMISSION: Photograph: Kayaking Ferron Creek. Photo credit: Becky Margraf

Ferron Creek provides a scenic, intermediate paddling experience in a desert viewscape that is accessible to more skill levels of the four boatable creeks in the Forest. There are also historical petroglyphs in the Ferron Box section that are thought to be from the Fremont culture predating A.D. 1200. 13 Ferron Creek itself is free flowing and unimpeded upstream from Millsite Reservoir, which is uncommon for headwaters streams in the Mountain West region. Most of the river segment is paralleled by FR 022, however there is minimal development within the river corridor. Additionally, we disagree with the determination that the fish habitat does not rise to the level of ORV. Contrary to the Fish ORV evaluation for Ferron Creek in the Wild and Scenic Rivers Report, the bluehead sucker species has been identified to occur in Ferron Creek 14 and the species and habitat that support them is uncommon regionally and nationally. If the USFS correctly employs multiple ROC scales then the occurrence of the bluehead sucker in Ferron Creek would qualify as an ORV. Currently, the ORV threshold for the Fish ORV is unrealistic and should be adjusted to favor eligibility rather than create additional barriers. Ferron Creek should be determined eligible with a preliminary classification of Recreational and with ORVs of Recreation, Fish, and Archaeology.

* Segment: Steven[rsquo]s Creek to USFS boundary
* Length: 3.5 miles
* Free-flowing: Yes. There are no documented impoundments or manmade structures on the river segment and

although small reservoirs exist on tributaries to Ferron Creek, there are no reservoirs on the main stem Ferron Creek upstream or within the river segment. 15
* Preliminary Classification: Recreational. Ferron Canyon Road (FR 022) parallels the river segment and there is a developed picnic area in the river corridor. However, there are no known diversion structures within this segment.
* ORVs:
* Recreation: Whitewater kayaking opportunities on Ferron Creek elevate the river dependent recreation opportunities to the level of ORV. Whitewater recreation on the Forest is very rare, with only three other river segments supporting whitewater recreation. Ferron Creek provides the easiest kayaking of the four reaches, making it accessible to a greater diversity of recreationists.
* Fish: Bluehead sucker populations have been identified in Ferron Creek, contrary to the information in the Wild and Scenic River Report, which states that bluehead sucker have not been found in the river corridor (Draft Plan, Appendix D, p. D1-18). The Wild and Scenic River Report also states that the river segment has not been identified as potential habitat for Colorado River cutthroat trout, however there is evidence that the Utah Division of Wildlife Resources has in fact identified Ferron Creek as potential habitat for conservation populations of pure Colorado River cutthroat trout with sterile rainbow trout and tiger trout components for sport fishing opportunities. 16
* Archeology: The Ferron Box petroglyphs are thought to be older than A.D. 1200 and are likely one of only a few places where Fremont culture petroglyphs can be found. 17 The petroglyphs attract visitors and complement the existing recreation opportunities in the river corridor.
* Online Resources:
* AW River Inventory Page/Photo Gallery: Ferron Creek
* Online forums:

* Mountain Buzz :
* Mountain Buzz is [ldquo]A forum community dedicated to whitewater kayaking, boating, and rafting enthusiasts.[rdquo] A search for [ldquo]Ferron Creek Utah[rdquo] produces over 490 discussion topic results.

SEE LETTER SUBMISSION: Photograph: Waterfalls on Left Fork of Huntington Creek. Photo Credit: David Weber

Segment: Miller Flat Creek to Huntington Creek

* Length: 4.5 miles
* Free-flowing: Yes. While there are multiple reservoirs in the headwaters of the Huntington Creek watershed, the lower Left Fork of Huntington Creek segment is free-flowing.
* Preliminary Classification: Scenic. There is a National Recreation Trail in the river corridor, but it is out of sight for the majority of the river segment.
* ORVs:
* Recreation: The creek provides a variety of outstanding recreation opportunities, including fishing, hunting, backpacking, and challenging whitewater kayaking opportunities. This river segment has the most challenging whitewater rapids and waterfalls on the Forest in an exceptionally scenic corridor. The 2017 Wild and Scenic River Study Process report cites unique features such as waterfalls and Class V rapids as examples of factors supporting a Recreation ORV and this river segment has these features.
* Scenery: The Left Fork of Huntington Creek is surrounded by spruce and fir stands and there are sage flats in the lower portion of the segment.
* Online Resources:
* AW River Inventory Page/Photo Gallery: Huntington Creek, Left Fork
* Riverfacts.com
* Bivy.com: Segment is included in a list of the best kayaking in Utah

SEE LETTER SUBMISSION: Upper Hundington Creek Photo Credit: Jeffrey Steadman

* Segment: Electric Reservoir to USFS boundary
* Length: 19 miles
* Free-flowing: Yes. While there are multiple reservoirs in the headwaters of the Huntington Creek watershed, the mean stem of Huntington Creek between Electric Reservoir and its confluence with the San Rafael River is free flowing.
* Preliminary Classification: Recreational. The river segment is paralleled by Utah State Route 31 most of the way and there are multiple developed campsites within the river corridor.
* ORVs:
* Recreation: The whitewater on the main stem Huntington is known to have been [ldquo]rediscovered[rdquo] in 2011 and would not have been recognized in the 2003 eligibility evaluation. From the confluence with the Left Fork to downstream of the USFS boundary is an established whitewater kayaking segment that has unique water slides and rapids. There is also popular fly fishing on this river segment. The fly fishing is known to be excellent and it is the only stream in Utah regulated as [ldquo]fly fishing only[rdquo], making the recreation opportunity particularly unique and special. 19
* Fish: There is a blue ribbon trout fishery on main stem Huntington Creek downstream of Electric Reservoir.

? Online Resources:

? AW River Inventory Page/Photo Gallery: Huntington Creek

? Riverfacts.com

Thank you for considering American Whitewater[rsquo]s comments on the Manti-La Sal[rsquo]s Draft Revised Forest Plan. Please reach out to us with any questions on the comments we have provided here. We look forward to providing additional comments on the plan revision process in the future.

1 Wild and Scenic Rivers Act, [sect] 1273 (b)

2 https://www.usbr.gov/projects/facilities.php?state=Utah

3 36 C.F.R [sect] 219.7(c)(2)(vi)

4 36 C.F.R. [sect] 219.10(b)(1)

5 Wild and Scenic Rivers Act, section 4(a)

6 https://www.americanwhitewater.org/content/River/state-summary/state/UT/

7 Interagency Wild and Scenic Rivers Coordinating Council. (1999). The Wild & Scenic River Study Process

8 https://www.americanwhitewater.org/content/River/state-summary/state/UT/

9 http://www.ewcd.org/reservoirs/joes-valley-reservoir/

10 https://www.ksl.com/article/31306305/5-fall-destinations-for-fishing-and-outdoor-recreation

11 https://www.redbull.com/us-en/episodes/reel-rock-s6-e3

12 https://www.americanwhitewater.org/content/River/view/river-detail/1843/main

13 http://www.emerycounty.com/archives/Archive_Photos/Ferron/Ferron.pdf

14https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=7421&context=etdhjgfghjhgadfghjkhaFXCCCCCCVB

15 https://maps.waterrights.utah.gov/EsriMap/map.asp

16 https://wildlife.utah.gov/public_meetings/info/2012-05_FerronDrainage_SERO.pdf

17 http://www.emerycounty.com/archives/Archive_Photos/Ferron/Ferron.pdf

18 http://www.utahfishinginfo.com/utahrivers/huntingtoncreek.php