



Sandra Watts
Acting Regional Forester
333 Broadway Blvd SE
Albuquerque, NM, 87102
Sent to: objections-southwestern-regional-office@usda.gov

CC: Mike Dechter, mike.dechter@usda.gov

RE: Supporting Comments of American Whitewater on the Final Comprehensive River Management Plan and Final Environmental Impact Statement for the Fossil Creek Wild and Scenic River

Dear Ms. Watts,

American Whitewater would like to take this opportunity to thank the Coconino and Tonto National Forests for the opportunity to provide our support for the recently released Comprehensive River Management Plan (CRMP) and Final Environmental Impact Statement for the Fossil Creek Wild and Scenic River. American Whitewater is not filing an objection to the CRMP, rather we extend our appreciation to the Forest Service for their efforts to incorporate American Whitewater's previous recommendations in the final CRMP.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with over 6,000 members and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates.

American Whitewater and our constituents are invested in the management of Fossil Creek and the surrounding public lands in the region. In 2014, American Whitewater submitted comments on the Fossil Creek CRMP Alternatives¹ and in 2017, we submitted substantive scoping comments on the Fossil Creek CRMP². More recently, we have played an active role in the plan revision process for the Tonto National Forest and we look forward to commenting on the Final Environmental Impact Statement when it is released.

Our most recent comments on the Fossil Creek CRMP highlighted the importance of the unique paddling opportunities on Fossil Creek and provided specific suggestions for management direction. We requested

¹ Comments of American Whitewater Fossil Creek Wild and Scenic CRMP Alternatives, June 11th, 2014.

² Scoping comments of American Whitewater on Fossil Creek Wild and Scenic River CRMP, January 26th, 2017



that paddling be formally acknowledged as a component of the recreation ORV and provided evidence of how paddlers have and continue to be stewards of the river and the surrounding area. Our comments advocated for a more flexible permit system allowing for at least a portion of permits to be available on a short-term basis. We also requested that the Forest Service consider the potential impacts to paddling that occur when Forest Road 708 is closed during rain and snow events. Finally, we provided factual corrections to information in the CRMP, including the fact that paddling has in fact occurred on Fossil Creek before the decommissioning of the hydropower project.

After reviewing the final CRMP, we are very pleased to find that many of American Whitewater's previous comments were directly addressed. We greatly appreciate the time and effort that the Forest Service dedicated to reviewing our comments and incorporating them in the CRMP. In particular, American Whitewater is particularly supportive of the following components of the CRMP:

- Full recognition of paddling opportunities as an important part of the recreation ORV
- The CRMP provides for a full range of river-related recreation opportunities, including boating
- Focusing on education, partnerships, and site design as effective tools for limiting boating impacts to travertine features
- Including partnerships with the boating community as an adaptive management tool to mitigate travertine impacts
- Improving road access at higher flows to increase high-flow boating opportunities
- Strategies to assess potential impacts to travertine through photo monitoring

American Whitewater recognizes the need to protect the sensitive travertine formations and their dependent habitat that exist in the river. As such, we support the necessary adaptive management strategies that aim to balance preserving the environment and maintaining access to the unique and outstanding paddling opportunities that exist on Fossil Creek. Below, we have identified some minor suggestions for improvement in the CRMP, however we do not feel that they rise to the level of an objection:

- While monitoring potential impacts to travertine formations, measures should be taken to differentiate between impacts from paddling and impacts from swimming and other non-paddling activities.
- When the hard threshold for travertine impacts is met, consider implementing craft type restrictions in lieu of complete seasonal restrictions. Packrafts are commonly used on Fossil Creek and due to the materials and weight, they are likely to have less of an impact on sensitive travertine formations compared to hardshell kayaks.
- The Forest Service should better define the soft and hard thresholds for physical impacts to travertine features. The hard threshold references "measurable evidence of human impacts", however no definition of measurable is provided. The monitoring is proposed to be completed through annual photos of travertine features, however no measurable baseline or threshold is established.³

³ Fossil Creek Wild and Scenic River Comprehensive Management Plan. Coconino and Tonto National Forests, Nov. 2020, pp. 135-136



Overall, American Whitewater applauds the Forest Service's efforts to create a balanced CRMP that focuses on adaptive management and public input. We hope that the Forest Service takes our suggestions into consideration in the finalization and implementation of the CRMP. American Whitewater looks forward to working with the Forest Service as a partner in the implementation of the CRMP for Fossil Creek and our membership appreciates the opportunity to continue to enjoy and recreate responsibly on Fossil Creek.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kestrel' followed by a stylized 'K'.

Kestrel Kunz

Associate Stewardship Director

Southern Rockies Program, American Whitewater

kestrel@americanwhitewater.org