

Data Submitted (UTC 11): 10/22/2018 12:28:04 AM

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Organization:

Title:

Comments: Comments on Nez Perce-Clearwater draft suitability report

Hello,

Thank you for the opportunity to comment on the Nez Perce-Clearwater draft suitability report for wild and scenic rivers. When I was younger I lived in this part of Idaho and enjoyed the outstanding scenic and recreational values that the area has to offer and I look forward to visits back there. Since then, I have taken up the sport of whitewater kayaking and have come to realize that tributaries and the Selway, Lochsa and Clearwater rivers hold some of the best kayaking that any location has to offer. These streams and rivers are also the home of world class fishing opportunities and there are numerous outstanding trails that follow some of these waterways that allow many people to enjoy these scenic areas. I recognize that this is a large document and probably took a tremendous amount of work to get it to the point it is at today.

I have read through the report and it is very difficult to decipher many parts of it. There is a lot of repeating text from one section to the next. In section 11, Support or opposition to designation, has almost verbatim text in each of the waterways that are listed. I am unclear as to what this section is based off of. Has this document, or the individual streams been put out for public comment before? The only place that I have been able to find any comments from the public is on section 10 of the ARC GIS Map from the Nez Perce website, referenced at the end of my comments. It does not appear as if the comments from there, which were dated from 2017, were incorporated into this report. It also seems as if there were comments from 2013 but I am unclear if they were included. Aside from 2 Idaho county commissioners, who were the other individuals who were referenced in section 11 of the report and why were their comments printed while others were not? Were there any whitewater paddlers or other recreational users? What exactly are the different alternatives under the segment Suitability Determination?

The Recreation ORV definition in the FS directives for Wild and Scenic Rivers is: "Recreational opportunities are high quality and attract, or have the potential to attract, visitors from throughout or beyond the region of comparison; or the recreation opportunities are unique or rare within the region. River-related recreational opportunities include, but are not limited to, sightseeing, interpretation, wildlife observations, camping, photography, hiking, fishing, hunting and boating. The river may provide settings for national or regional use or competitive events." (FSH 1909.12, chapter 80)

I question the criteria that were used to define streams that were boatable for classification purposes. (Link to ORV page below) I believe that more credence should be given to streams that have high quality whitewater but long hikes in for access issues. Today, packrafts are commonly used to run class IV and some class V whitewater. These boats are lightweight and pack into a small backpack which allows paddlers to easily hike in long distances and paddle challenging white water. Kayakers also will carry boats many miles to run pristine whitewater. Boaters travel from outside the region every spring to paddle on the Lochsa as well as surrounding creeks.

Timber harvesting is an activity that is referenced throughout the document as an activity that will be curtailed if the rivers and streams are designated for suitability. According to page 39 of A Compendium of Questions & Answers Relating to Wild & Scenic Rivers, (link at end of comments) designation does not preclude timber harvests within or outside the river corridor. "WSR designation is not likely to significantly affect timber management activities beyond existing measures to protect riparian zones, wetlands, and other resource values as guided by other federal requirements." I would like this comment to apply to all entries in the suitability report

that reference timber harvest being curtailed.

#### Comments on specific rivers

##### Potlach River

I was especially concerned when I began reading through the document and came to the first entry under the Clearwater basin, the Potlach River. The description is of a high quality whitewater run that is easily accessible and suitable under your listed criteria. At the end of the report entry it states that this river is dangerous and difficult to access legally. The description stated that it has an easy access and takeout. I don't understand why this document includes this contradictory and confusing information. Please don't use documents such as these as a tool to discourage use of public lands. I would like to see the whole last paragraph of section 11 struck from the final version of this document and the suitability determined to be eligible.

##### North Fork Clearwater River

This river has easy access and high quality whitewater. Timber harvests can still be conducted under scenic and recreational rivers designation and should be used as a tool to manage the corridor in the most ecologically sound way. I request that suitability of the North Fork Clearwater be determined to be eligible for scenic and recreational designation.

##### Weitas Creek

This is a river that contains class II-IV whitewater that is easily accessed by a relatively short hike. This is a type of river that is immensely appealing to pack rafters and kayakers and paddling should be added as a recreation ORV. I request that suitability of Weitas Creek be determined to be eligible for scenic and recreational designation.

##### ELK Creek

Elk Creek has a number of highly scenic waterfalls as well as easy access. This area has been managed for its scenic quality and it should continue to be managed this way. I request that suitability of elk Creek be determined to be eligible for scenic and recreational designation.

##### Cayuse Creek, Kelly Creek, North Fork Kelly Creek, Middle Fork Kelly Creek, and South Fork Kelly Creek

Please add paddling to the recreation ORV for Kelly and Cayuse creek. This area has class III to IV whitewater located in beautiful scenic setting. There are high quality whitewater opportunities along with hike in access opportunities to paddle these creeks. I request that suitability of these creeks be determined to be eligible for wild, scenic and recreational designation.

##### Little North Fork Clearwater River

Thank you for selecting 3.5 miles but please designate the whole 26.6 mile section that the NP-C NPF found eligible for inclusion. This road accessible whitewater river contains numerous high quality class II-IV rapids.

##### Lolo Creek

Lolo creek provides an exceptional whitewater paddling opportunity and should be designated a suitable recreational river. This is in response to the county commissioners who fear an increase in search and rescue due to designation. High level whitewater boaters are an independent group and prepared to take care of their own rescue situations. Designating this river would increase the users it would help to protect the current exceptional recreational value. This document should not be used as a tool to try to limit users to public land.

Upper Lochsa River, Colt Killed Creek (formally known as "White Sand Creek"), Big Sand Creek, Storm Creek, North Fork Storm Creek, and South Fork Storm Creek

Colt creek is a Class III-IV whitewater run that flows through a wild and beautiful Roadless setting. The put in for the run is located off of forest road 359 and the whitewater is easier than the whitewater on the main Lochsa. This area provides for extremely high quality recreational opportunities as well as important spawning areas for fish. I request that suitability of these creeks be determined to be eligible for scenic and recreational designation.

Crooked Fork Creek, Brushy Fork Creek, and Hopeful Creek

Brushy fork creek has a history of whitewater kayaking and it should be included in the recreational ORV. Please include suitable determination for all of these creeks.

Fish Creek

Fish creek is a road accessible, class IV, tributary to the Lochsa River that is commonly paddled. Class IV whitewater is not extreme and should be included in the recreation ORV. I request that suitability of this creek to be determined to be eligible for scenic and recreational designation.

Huckleberry Creek

Huckleberry creek has primitive hot springs along it which makes it unique in its recreational aspect. This hot spring is a draw to forest users from throughout the region. . I request that suitability of this creek to be determined to be eligible for scenic and recreational designation due to its uniqueness.

Selway Basin

Bear Creek

Bear creek should be recognized as a river that is used to access the Selway River for recreational ORV. It seems as if the recreational use of this area is ignored. Please reevaluate the recreational use of this area, add recreational ORV and designate suitability for wild scenic and recreational.

Gedney Creek

Please re-evaluate the paddling recreational opportunities on Gedney creek. As stated before scenic and recreational designation does not preclude timber harvesting to meet the ecological management objectives. Please reevaluate the recreational use of this area, add recreational ORV and designate suitability for wild scenic and recreational.

Meadow Creek

Thank you for finding meadow creek suitable under Alternative A and W (whatever those mean). Meadow creek

is a class IV-V whitewater river and has a history of descents. This is the type of creek that is of high desirability to pack rafters and kayakers. It has good accessibility from local hiking trails. Please re-evaluate the recreational ORV of meadow creek and classify it as recreational, wild and scenic.

Three Links Creek

Please re-evaluate the recreational ORV of this river as it is suitable for paddling.

South Fork Clearwater basin

South fork Clearwater River

This is a road accessible whitewater run that sees many descents each year. The recreational ORV of this river should be re-evaluated to mirror the fact that it is used for whitewater recreation. I request that suitability of this river to be determined to be eligible for scenic and recreational designation.

Salmon River

This river sees thousands of recreational users each year and I support the classification of it as recreational, wild and scenic

Thank You,  
Chris Walker

Section10, Arc GIS MAP

(<https://usfs.maps.arcgis.com/apps/MapSeries/index.html?appid=88d41b083eb640f6a329c673d2b83188>)

Recreation outstanding value (ORV)

[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd552945.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd552945.pdf)

A Compendium of Questions & Answers Relating to Wild & Scenic Rivers

<https://www.rivers.gov/documents/q-a.pdf>

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Chris Walker