

Summary of Comments
Problems with "Final Eligibility Study Process" Implementation
Evalyn Bennett; June 15, 2018

Insufficient Information Provided for Public Review and Comment

- no maps of regions of comparison for outstandingly remarkable values (ORV)
- no maps comparing the rarity or abundance of similar ORV within the region of comparison, to establish that the proposed ORV are rare, unique or exemplary
- no summary of *all* currently eligible rivers, to allow comment on changed circumstances
- no metadata, land ownership, open road/trail access, or spatial references on river maps
- no marked locations of scenic, historic/cultural, geologic, or botanical features on maps
- no published database listing impediments to free-flowing character
- no access to prior eligibility study documents until specifically requested in April 2018

Failure to Verify Estimated or Predicted ORV with Recent Site-Specific Data (Field Validation)

- no 2017 interdisciplinary team site visits to proposed or currently eligible sites to verify that estimated ORV are currently in the river or its corridor
- use of a computer model to assert a current fish ORV based on the model's prediction of future (2040) habitat
- use of 21-year-old data to assert a current botanical ORV
- no use of post-fire wildfire monitoring data to augment Google Earth and Landfire estimations
- geological reports that do not conclusively prove the ORV is present in the river corridor
- ecological ORV reports that assert rivers are within research natural areas, when they are not
- use of aerial imagery that is not at a site-specific scale, is color corrected, and is a compilation of images from various (undisclosed) dates

Implied Consideration of Private Lands for WSR Designation

- discrepancy between total river miles and SCNF-administered miles on 22 river segments
- specific direction to include private lands in order to identify longer segments (rather than segmenting the river)

Failure to Utilize a Forest Interdisciplinary Team for All Required Steps of the Eligibility Study

- no IDT identification of specific "changed circumstances" that either enhance or diminish OR values of current eligible rivers
- no IDT determination that intermittent streams are still eligible (and why)
- no IDT determination that an ORV is rare, unique or exemplary within the region of comparison
- no IDT identification of key river-dependent wildlife species

Inclusion of a River that was Previously Studied but Had No Identified ORV

Failure to Seek Meaningful Local Public Input during the 2017 Eligibility Study

- no (or minimal) solicitation of public comment regarding free-flowing character, changed circumstances, ORV, or preliminary classification
- failure to use "feedback from outfitters and guides" or "angler surveys"

Use of Data Sources in the Draft WSR Eligibility Report that Were *Not Approved* in the Study Process OR Failure to Use Data Sources that *Were Approved* in the Study Process

- fish ORV predictive model (used, not approved)
- scenic ORV data sources (used, not approved)
- recreation ORV data sources (approved, but not used)

This extensive list of concerns demonstrates the need for the Forest IDT to prepare and release for 45 days of public review and comment a Revised Draft WSR Eligibility Report