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September 29, 2014

Inyo, Sequoia and Sierra National Forest Supervisors
c/o Maria Ulloa
Forest Plan Revision
1839 So. Newcomb St.
Porterville, CA 93257

Sent via electronic mail to r5planrevision@fs.fed.us

Dear Forest Supervisors,

American Whitewater appreciates having the opportunity to provide scoping comments for the Environmental Impact Statement for the revision of the Inyo, Sequoia and Sierra Forest Plans. We provided comment and feedback during the Assessment phase for all three forests, and look forward to continuing to participate in the public process for revising the Forest Plans. We submit these comments in addition to our joint comments filed as part of Outdoor Alliance to provide further information relevant to sustainable recreation, water quantity, and Wild and Scenic Rivers.

American Whitewater is a national non-profit organization dedicated to conserving and restoring our country's whitewater resources, and to enhancing opportunities to enjoy them safely. We have over 5,800 members - typically non-commercial kayakers, rafters, and canoeists - that regularly paddle rivers flowing through the Inyo, Sequoia and Sierra National Forests. As conservation-oriented whitewater paddlers, we have an interest in healthy river systems and the watersheds that surround them. We have also invested significant effort into flow restoration and/or management on several rivers throughout the Sierra Bio-region through the Federal Energy Regulatory Commission's hydropower relicensing process.

Canoeing, kayaking and rafting are likely the oldest forms of travel and exploration aside from walking. Though technological advances have improved safety (as in all outdoor recreation), the core elements of the activity remain—exploring natural areas by paddling a small boat through the landscape on rivers. Each river is a natural trail through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and Wilderness-compliant. In short, it is exactly the kind of activity and experience covered under the definition of “sustainable recreation” in the new Forest Planning Rule. American Whitewater requests that each forest recognize and consider the value of whitewater recreation in each of the revised forest plans.

I. Recognizing Whitewater Recreation Activities on Region 5 Forests

The Sierra mountains of California are not only home to many paddlers, but are also a highly sought after destination for paddlers from across the globe. The Inyo, Sequoia and Sierra National Forests offer paddlers spectacular rivers and scenery with assured legal access. The Forests offer paddlers a vast array of unique and high quality whitewater paddling opportunities and highly scenic setting. These experiences are provided on the Middle Fork of the San Joaquin River, the Middle Fork and South Fork Kern River, Middle, South, and North Forks and mainstem San Joaquin River, Dinkey Creek, the North Fork and South Fork Kings Rivers, the Tule River and others.

We request that the Inyo, Sequoia and Sierra Forest Plans recognize the important value that the rivers of the region provide for this non-motorized activity. American Whitewater's National Whitewater Rivers Inventory offers a relatively comprehensive view of paddling in California.¹ This Inventory also has a geospatial Google Earth layer associated with it that can be downloaded at the bottom of the above referenced page.² This resource provides information that can help inform the Forest Planning process. Additional resources include The Best Whitewater In California,³ and a Wet State and California Creeks websites.⁴

II. Hydropower on the Forests

The Sierra Mountains have been highly developed for hydropower generation for well over half a century. This development has had significant deleterious effects on aquatic biodiversity and has also had a profound effect on river-based recreation. Many prime whitewater boating opportunities lie beneath reservoirs, and diversions have left some rivers without adequate or predictable flows to support paddling. As noted in the Outdoor Alliance comments, sufficient flow in rivers is also important for providing a suitable river-based recreation experience. Over the last two decades, American Whitewater has invested significant resources and time into ensuring that rivers impacted by hydropower projects provide whitewater recreation opportunities. In that time, we have worked closely with the Forest Service and other regional stakeholders to remedy or enhance flow regimes on several regional rivers. We look forward to a continued partnership on each of them, as described in more detail below, and encourage the Forest Service to seek these partnerships in the Forest Planning process.

We request that the Forest Service note the importance of public interest partnerships in FERC licensing and relicensing proceedings in the Forest Plans. The Guidelines for the Water Quality, Water Quantity, Soils and Watershed Condition values outlined in the *Detailed Proposed Action* (p. 48-49) include cooperation with federal, tribal, state and

¹ <http://www.americanwhitewater.org/content/River/state-summary/state/CA/>

² <http://www.americanwhitewater.org/content/River/state-summary/state/CA/.kml>

³ Holbeck, Lars and Stanley, Chuck, *The Best Whitewater in California: The Guide to 180 Runs*, 3rd edition. Watershed Books, 1998.

⁴ <http://awetstate.com>; <http://www.cacreeks.com>

local governments. We applaud the Forest Service for seeking to support non-profit, public benefit organizations as a strategy outlined in the *Detailed Proposed Action* for Recreation Opportunities, and are similarly pleased to see that the Forest Service intends to explore partnership opportunities with user groups as an access strategy. These partnerships are also an important element to a successful FERC licensing or relicensing process, and we recommend that the Forest Plans encourage cooperation with interested stakeholders and public interest organizations in those proceedings.

a. Sierra National Forest

There are a number of hydropower projects that influence rivers on the Sierra National Forest, and American Whitewater has been an active partner in the relicensing of Southern California Edison's Big Creek Hydropower Project (FERC Project Nos-2085, 2175, 67 and 120) on Big Creek and the South Fork and mainstem San Joaquin Rivers. In 2007, American Whitewater was a party to the settlement agreement, which established new, more natural flow conditions to the San Joaquin River and many of its tributaries. Currently, the license is awaiting issuance of the 401 Water Quality Certification. We look forward to the implementation of the conditions reached in the settlement agreement, which integrates the flow needs of recreation and ecosystem functions. We encourage the new Forest Plan to support, and where possible enhance, the recreational opportunities provided in the settlement agreement.

b. Sequoia National Forest

On the Sequoia National Forest, there are two hydropower projects on the Kern River where we look forward to working with the Forest Service further, and recommend that the new Forest Plan to seek to support, and where possible enhance, these recreational opportunities.

1. Upper Kern: KR 3 Hydropower Project (FERC # 2290)

Southern California Edison's (SCE) KR 3 Hydropower Project diverts the Kern River at Fairview Dam 17 miles downstream to the KR 3 Powerhouse. The Project is capable of diverting up to 600 cfs, and when inflows to Fairview Dam exceed that amount, the dam spills water into the usually de-watered 17-mile reach (the Project has no storage capacity). Spill typically occurs during the spring and early summer, coinciding with the Sierra snowmelt. When there is enough water in the reach, there are Class II to Class V whitewater boating opportunities, depending on where you launch and take out.⁵

In the mid-1990's, a FERC license was issued for the KR 3 Project which contained 4(e) conditions from the Forest Service to address impacts to whitewater recreation below Fairview Dam. American Whitewater and Friends of the River believed these conditions did not provide adequate mitigation, and after filing two successful lawsuits, entered into

⁵ <http://www.americanwhitewater.org/content/River/detail/id/218/>

settlement negotiations with SCE to craft a mutually agreeable whitewater flow schedule. In December 2002, American Whitewater, Friends of the River, and SCE signed a Settlement Agreement for whitewater releases from Fairview Dam on the upper Kern River above the community of Kernville. The Agreement and revised USFS 4(e) conditions require 39 days of whitewater releases a year.

In July 2013, SCE proposed license amendments to the whitewater boating schedule without consulting interested stakeholders, including the Forest Service. American Whitewater is currently working with the Forest Service and SCE to amend the Forest Service's 4(e) conditions so that they are consistent with the whitewater recreation conditions outlined in the settlement agreement and the FERC license.

Ensuring compliance with this agreement will provide important recreational benefits for the many paddlers that come to the Kern River to recreate. The FERC license agreement requires that the Forest Service hold an annual meeting with SCE. We have found that license implementation goes more smoothly when all interested stakeholders are invited to the table, and request that the Forest Service invite whitewater boating interests, and other interested stakeholders, to these meetings. Overall, this experience has demonstrated the importance of solid working relationships between the Forest Service and public interest organizations, as described in section II above.

2. Lower Kern: Lake Isabella and Borel Powerhouse

The Kern River below Lake Isabella provides 40 miles of a diverse range of opportunities for whitewater recreation.⁶ The Sandy Flat to Democrat run is the most popular commercial rafting run in the region and is where many Southern California residents get their first taste of whitewater paddling. Flows below Isabella Dam are influenced by a number of entities. The Army Corps of Engineers (USACE) operates Isabella Dam, while SCE operates the Borel Powerhouse (FERC #382) downstream, and the Kern Watermaster, who is an agent of the Kern Water Users, is in charge of releases from Isabella for agricultural and other consumptive needs. Additionally, the Forest Service manages recreation on the Lake and below the dam.

Currently, there is no established flow schedule for the Kern River below Isabella Dam. A reliable flow schedule is one of the most important factors related to whitewater recreation on this section of the river, enabling both private boaters and commercial outfitters to know when flows will be available.

⁶ See <https://www.americanwhitewater.org/content/River/detail/id/220/>
<https://www.americanwhitewater.org/content/River/detail/id/221/>
<https://www.americanwhitewater.org/content/River/detail/id/222/>
<https://www.americanwhitewater.org/content/River/detail/id/223/>
<https://www.americanwhitewater.org/content/River/detail/id/6148/>

The USACE is currently in the process of upgrading Isabella Dam for safety improvements, and is working with the Forest Service regarding mitigating lost recreational opportunities. We believe that there is an opportunity for the Forest Service to improve conditions by working with all stakeholders to develop a process whereby a release schedule can be developed at the beginning of each season.

III. Eligibility Studies

The Forest Planning Rule requires the Forest Service to identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System in any forest plan revision.⁷ Where past inventories have been completed, new information and/or changed conditions should trigger updates to the inventory.⁸ Many factors have changed since the last Forest Plans were finalized over two decades ago, including recreational changes and an increased understanding regarding climate change. As a result, an updated eligibility inventory is timely.

The final eligibility inventory should seek the type of information envisioned in the proposed Forest Service Handbook. Specifically, the inventory should have information on what makes the river special, potential Outstanding Remarkable Values, and if possible, a photograph. We request that the Forest Service consult American Whitewater's National Whitewater Rivers Inventory⁹ and The Best Whitewater In California¹⁰ to gain a better perspective of the recreational opportunity these rivers offer, and update the Wild and Scenic River eligibility inventory based on this new recreational information.

Below is a list of rivers and streams that provide a foundation for an eligibility inventory within the Inyo, Sequoia and Sierra National Forests. These reaches are free-flowing and offer spectacular and remote paddling adventures and other values that are extremely rare in the lower 48 states, and warrant serious consideration for their eligibility. American Whitewater requests that eligibility documents reflect the value these reaches provide for whitewater recreation. The lists below are not comprehensive, and there are more rivers and streams in the Forests that are freely flowing and possess outstandingly remarkable values. We look forward to contributing to and reviewing this inventory.

a. Inyo National Forest

- Hot Creek: Provides an outstanding Class II whitewater opportunity during the spring peak runoff. Boaters put in downstream of Hot Creek Ranch where public

⁷ 36 C.F.R. §219.7(c)(2)(vi).

⁸ *Id.*

⁹ <http://www.americanwhitewater.org/content/River/state-summary/state/CA/>

¹⁰ Holbeck, Lars and Stanley, Chuck, The Best Whitewater in California: The Guide to 180 Runs, 3rd edition. Watershed Books, 1998.

access begins, and make the run down to Owens River Road. The creek winds through a unique canyon with stunning geology, hot springs and plentiful wildlife.

- The Middle Fork of the San Joaquin River:¹¹ Flows through the Inyo National Forest, Devils Postpile National Monument, and the Sierra National Forest, and is a river with many outstandingly remarkable resources that warrant serious consideration for eligibility in the Wild and Scenic System. The river provides outstandingly remarkable whitewater recreation opportunities.

b. Sierra National Forest

- Big Creek (tributary of the South Fork Merced):¹² Boaters put in at Fish Camp in the Sierra National Forest before the creek flows into Yosemite National Park. The run flows during the spring and early summer, and offers scenic Class II to Class V boating opportunities.
- NF Willow Creek:¹³ The put-in for this popular run is at Grey Mountain Campground and ends at Bass Lake, with an option to take out or put in at Chilkoot Campground. The run provides Class V boating opportunities with fun slides and falls through beautiful canyons with stunning scenery and interesting geologic features.
- Big Creek (tributary of San Joaquin):¹⁴ This reach provides a 2.25 mile Class II to Class V whitewater run. Also known as the China Peak run, boaters hike in to the put-in at Indian Pool and take out at Huntington Lake.
- Big Creek (tributary of Kings River):¹⁵ Boaters put in at the bridge on Forest Service Route 7 and take out six miles downstream at Trimmer Springs Road. The run provides a good opportunity for boaters to learn technical skills on Class III to Class V rapids.
- Dinkey Creek:¹⁶ This creek is a tributary of the North Fork Kings River. Boaters will put in at Dinkey Dome and take out at Dinkey Creek Campground; put-in at the Campground and run to a logging spur road (Cherry Bomb Falls Section); and

¹¹ <http://www.americanwhitewater.org/content/River/detail/id/290/>

¹² <http://www.americanwhitewater.org/content/River/detail/id/4772/>

<http://www.americanwhitewater.org/content/River/detail/id/154>

¹³ <http://www.americanwhitewater.org/content/River/detail/id/4032/>

<http://www.americanwhitewater.org/content/River/detail/id/4033/>

¹⁴ <http://www.americanwhitewater.org/content/River/detail/id/5028/>

¹⁵ <http://www.americanwhitewater.org/content/River/detail/id/155/>

¹⁶ <http://www.americanwhitewater.org/content/River/detail/id/3960/>

<http://www.americanwhitewater.org/content/River/detail/id/177/>

<http://www.americanwhitewater.org/content/River/detail/id/179/>

<http://www.americanwhitewater.org/content/River/detail/id/178/>

put in either at Ross Creek Trail or Old Mine Trail and make the run to the confluence with the North Fork Kings River. Dinkey Creek provides a Class IV-V opportunity for whitewater paddlers and is known throughout the world for its outstanding whitewater and scenery. It consists of fun bedrock slides and ledges, and has a dependable season. The river is at risk for hydropower development.

- North Fork Kings River:¹⁷ The North Fork of the Kings River has outstandingly remarkable whitewater and scenic values above Wishon Reservoir and below the Balch Afterbay to its confluence with the mainstem Kings River. Above Wishon Reservoir, the reach is accessible by hiking in and has been described as one of the most beautiful places to paddle on Earth. Downstream, boaters put in at the Balch Afterbay and enjoy Class V whitewater through stunning scenery and remarkable geology to the confluence with Dinkey Creek, and later the mainstem Kings River. Below the confluence with Dinkey Creek, the run has a dependable season from the middle of winter through early summer. The last few hundred yards above the confluence with the mainstem Kings River provide excellent technical slalom practice, and was the site of the 1972 West Coast Olympic slalom kayaking trials.
- Helms Creek:¹⁸ This tributary of the North Fork Kings River, from Courtright Reservoir to the confluence with the North Fork Kings, provides an outstandingly scenic whitewater opportunity through a U-shaped canyon with long slides.
- Mono Creek:¹⁹ Mono Creek is a tributary of the South Fork San Joaquin River, providing whitewater boaters with Class IV and V opportunities. The Creek flows from its headwaters into Lake Edison, which is created by Vermillion Valley Dam, part of the Big Creek Hydroelectric Project. From the reservoir, Mono Creek flows to the South Fork San Joaquin. Boaters put in and take out at Mono Diversion.
- Bear Creek:²⁰ Bear Creek is a tributary of the South Fork of the San Joaquin River. Boaters make the hike to the put-in at the Pacific Crest Trail and make the Class V+ run to the Bear Diversion Dam. The run drains the John Muir Wilderness, cuts through Sierra granite and is surrounded by scenic mountains.
- Granite Creek:²¹ Granite Creek is an undammed tributary of the Middle Fork San Joaquin that provides a scenic and high quality Class III to Class V run from Strawberry Mine to near the Cassidy Trial.

¹⁷ <http://www.americanwhitewater.org/content/River/detail/id/1723/>

¹⁸ <http://www.americanwhitewater.org/content/River/detail/id/5011/>

¹⁹ <http://www.americanwhitewater.org/content/River/detail/id/6260/>
<http://www.americanwhitewater.org/content/River/detail/id/4011/>

<http://www.americanwhitewater.org/content/River/detail/id/4790/>

²⁰ <http://www.americanwhitewater.org/content/River/detail/id/6339/>

²¹ <http://www.americanwhitewater.org/content/River/detail/id/4591/>

c. Sequoia National Forest

- Middle Fork Tule:²² The Middle Fork Tule offers a spectacular Class IV-V whitewater run from Camp Nelson to Springville/Globe (Lake Success). With scenic waterfalls that provide clean lines, the Middle Fork Tule is an excellent creek run for skilled whitewater kayakers.
- Mill Flat Creek:²³ Mill Flat Creek is a tributary of the Kings River, providing a 2-mile, Class IV-V run from Crabtree (FS Road 12S01) to its confluence with the Kings. The creek has recreational value for whitewater boaters, with fun bedrock slides and ledges.
- Kern:²⁴ The Kern River below Lake Isabella to Kern Powerhouse #1 provides an outstanding whitewater boating resource. The whitewater run provides a pool and drop run with scenic granite cliffs, and a section that Holbeck and Stanley describe as “paradise” for skilled whitewater kayakers. The reach is also listed in the National Park Service’s Nationwide Rivers Inventory from Borel Powerhouse to Democrat Dam for its diversity of recreation opportunities, scenery and habitat for unique species of slender salamander.²⁵
- Brush Creek:²⁶ Brush Creek is a tributary of the Kern. From Rincon Camp to the Kern, it’s a 1.5 mile Class IV-V run. It provides outstanding whitewater boating and has stunning scenery. This run is considered to be one of the best introductions to waterfall running anywhere. Intermediate boaters flock to this run every year. While more challenging at higher flows, at lower flows it is appropriate for Class III+ boaters and it can be run as low as 50 cfs.
- Dry Meadow Creek:²⁷ Dry Meadow Creek is a tributary of the North Fork Kern that is 1.5 miles from Dry Meadow to its confluence with the North Fork Kern. This run provides spectacular whitewater boating opportunities, and scenic and geologic values. The “Teacups” section is a series of waterfalls that have been carved out of solid granite slab. More difficult than Brush Creek, this run is very popular with more skilled boaters. The reach is featured on the Annual Park Pass this year, and has also been used in advertisements and outreach material.

²² <https://www.americanwhitewater.org/content/River/detail/id/5091/>
<http://www.awetstate.com/MTule.html>

²³ <https://www.americanwhitewater.org/content/River/detail/id/251/>

²⁴ <https://www.americanwhitewater.org/content/River/detail/id/220/>

<https://www.americanwhitewater.org/content/River/detail/id/221/>

<https://www.americanwhitewater.org/content/River/detail/id/222/>

²⁵ <http://www.nps.gov/nrcr/programs/rtca/nri/states/ca.html>. “The NRI is a source of information for statewide river assessments and federal agencies involved with stream-related projects. For any group concerned with ecosystem management, the inventory can provide the location of the nearest naturally-functioning system which might serve as a reference for monitoring activities. It also serves as a listing of plant and animal species for restoration efforts on a similar section of river. For the recreationalist, it provides a listing of free-flowing, relatively undisturbed river segments.”

²⁶ <http://www.americanwhitewater.org/content/River/detail/id/2297>

²⁷ <http://www.awetstate.com/DryMeadowCreek.html>

- King's River:²⁸ The Kings River forms the boundary between the Sequoia National Forest and the Sierra National Forest. It is Wild and Scenic for 5 miles from confluence of the Middle Fork and South Fork Kings to Garlic Meadow Creek. From Garlic Creek downstream to Kirch Flat Campground, the river provides outstanding whitewater opportunities and stunningly scenic granite cliffs and dependable flows in the early spring through summer.

IV. Suitability Determinations for Wild and Scenic Rivers

The 2012 Forest Planning Rule requires that the Forest Service conduct inventories for rivers that are eligible for Wild and Scenic designation during the planning process.²⁹ The rule is silent on the agency role in suitability determinations.

Similarly, the Wild and Scenic Rivers Act (WSRA) requires the Forest Service to consider potential Wild and Scenic Rivers during planning processes.³⁰ Potential Wild and Scenic Rivers are either 1) identified as eligible by the Forest Service,³¹ or 2) identified as potential Wild and Scenic Rivers by Congress.³² These are commonly referred to as *eligible rivers* and *study rivers* respectively.

Eligibility is a straightforward administrative determination that is ubiquitous and mandatory during planning. To be eligible, a river must be free-flowing and possess at least one outstandingly remarkable value.³³ Suitability is a much more in-depth, costly, and time-consuming analysis that results in a formal detailed report to the President that either recommends specific rivers for designation or finds them unsuitable for designation. Unsuitable rivers are released from the protective umbrella of the WSRA. Importantly, the Forest Service is authorized and mandated to determine the suitability or unsuitability only of *study rivers* determined by Congress to be potential Wild and Scenic Rivers.³⁴ We agree that the Forest Service should not conduct suitability determinations during the planning process, as suggested in the Notice of Intent, and contend that the Forest Service is not mandated or authorized to determine the suitability or unsuitability of rivers found to be *eligible* by the Forest Service under Section 2(b) of the WSRA.

²⁸ <http://www.americanwhitewater.org/content/River/detail/id/224/>
<http://www.americanwhitewater.org/content/River/detail/id/225/>

²⁹ 36 C.F.R. § 219.7(c)(2)(vi).

³⁰ Wild and Scenic Rivers Act of 1968 § 5(d)(1), 16 U.S.C. § 1276(d)(1) (2014) (“In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas.”).

³¹ 16 U.S.C. § 1273(b).

³² 16 U.S.C. § 1276(b).

³³ 16 U.S.C. § 1273(b).

³⁴ 16 U.S.C. § 1275(a) (“The Secretary of the Interior ... shall study and submit to the President reports on the suitability or nonsuitability for addition to the national wild and scenic rivers system of rivers which are designated herein or hereafter by the Congress as potential additions to such system.” (emphasis added.))

V. Management of Designated Wild and Scenic Rivers

The Inyo, Sequoia and Sierra National Forests manage a number of Wild and Scenic Rivers that are of high importance to whitewater paddlers. These include the Wild and Scenic Merced and its South Fork, the Kings River and its North and South Forks, and the North Fork and South Fork of the Kern. American Whitewater recommends that the Forests update the relevant Wild and Scenic Comprehensive River Management Plans concurrently with the Forest Plans. Updating the Forest Plan and River CRMP concurrently offers both the Forest Service and the public significant efficiencies in participation (e.g. one set of meetings, one NEPA analysis, and one integrated planning framework).

We suspect that the Comprehensive River Management Plans (CRMPs) for these rivers, which were developed in the late 1980's and early 1990's, fail to recognize the outstanding and remarkable paddling opportunities provided by these Wild and Scenic Rivers. Additionally, given the changes in river management practices, demographics, recreational preferences, and other management issues since these plans were finalized, it is likely that these plans are out of date beyond the issues we raise below.

For example, during the Assessment process, documents stated that “rafting does not occur [on the Kings River from the confluence of the Middle and South Forks to Garlic Meadow Creek] due to the hazards involved and the lack of access (USDA 1988b).” This is not the case. This section of river has been run by kayakers and rafters for at least the past 20 years and is described as “a great run.”³⁵ We were pleased to see that the Forest Service made note of this change during the Assessment process, and would like to ensure that the value all of the Wild and Scenic Rivers on the forests provide for whitewater recreation is accurately noted during the NEPA process. We encourage the Forest Service to consult our Nationwide Whitewater Rivers Inventory relating to the Wild and Scenic Rivers throughout the three forests.

One particular management anomaly also indicates a potential need for updating the plans. The 1994 Comprehensive Management Plans for the Wild and Scenic South Fork and North Fork Kern Rivers limit non-commercial boaters to 15 people per day. We believe that this number is unnecessarily restrictive and targets an activity that has no greater impact on the wilderness character of the river than the other activities that occur in the river corridor, such as hiking and angling. None of these other activities have limitations imposed upon them. An update to the CRMP will allow for the opportunity for the Forests to consider the monitoring data called for in the 1994 CRMP and reconsider this exclusive restriction on whitewater boaters.

³⁵ <http://www.americanwhitewater.org/content/River/detail/id/224/>

VI. Conclusion

Thank you for considering our comments for the scoping phase of the Environmental Impact Statement for revising the Forest Plans for the Inyo, Sequoia and Sierra National Forests. We look forward to working with the Forests throughout the process, particularly relating to managing rivers impacted by hydropower, rivers eligible for Wild and Scenic status, and managing those that are currently within the national system.

Sincerely,



Dave Steindorf
California Stewardship Director



Megan Hooker
Associate Stewardship Director