

February 10th, 2017

Emily Platt, District Ranger
Mt. Adams Ranger District
Gifford Pinchot National Forest
2455 Hwy 141
Trout Lake, WA 98650

Electronically submitted to: comments-pacificnorthwest-giffordpinchot-mtadams@fs.fed.us

RE: Comments of American Whitewater on the Draft Environmental Assessment for the Comprehensive River Management Plan for the White Salmon River and Cascade Creek

Dear Ms. Platt:

Thank you for the opportunity to provide comment on the Draft Environmental Assessment (EA) for the Comprehensive River Management Plan (CRMP) for the White Salmon River and Cascade Creek Wild and Scenic Rivers. We believe that the development and implementation of a CRMP is critical to ensuring that the values that caused a stream to be designated as a Wild and Scenic River are protected and enhanced.¹ At the same time the CRMP should ensure that the public's connection to the White Salmon River and Cascade Creek remains intact and strengthened through designation.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 6000 individual members and 100 local-based affiliate clubs, representing whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater and our local members have been active stakeholders in the effort to designate the upper White Salmon River and Cascade Creek as a Wild and Scenic Rivers and develop a CRMP. American Whitewater has a significant percentage of members residing in close proximity to the White Salmon River as well as members who travel from across the country to experience this unique resource.

Inspiring River Enthusiasts to be Advocates for River Conservation

Rivers are protected by the members of the public that know them best through the personal connections they develop through the time they spend on them. It is

¹ The upper White Salmon River and Cascade Creek were designated Wild and Scenic in 2005 through Public Law 109-44.

vital for the fate of both protected and yet-to-be protected rivers that CRMP's maintain, protect and celebrate these connections. The goal of the Wild and Scenic Rivers Act is to celebrate special rivers, and ensure they stay special for current and future generations to enjoy. It is a flexible piece of legislation that requires sustainable and inclusive management. Although this makes the law a popular tool for protecting rivers, over 70,000 large dams exist in this country and less than 1% of rivers are protected from dams under the Act.² For the Wild and Scenic Rivers Act to remain a viable and popular conservation tool, a CRMP must protect rivers while embracing opportunities for the public and river enthusiasts to connect with the resource.

Whitewater Boating and Navigability of Upper White Salmon River

Whitewater boating occurs on the upper reaches of the White Salmon River within segment D of the scenic-classified reach. This approximately 8 mile run begins at the Forest Road 8031 Bridge and ends at the Mt. Adams Road bridge near the community of Trout Lake.³ We agree with the finding that while kayaking is a popular activity in the area, "this specific stretch of river receives minimal use" due to "limited access, short season, difficulty, river hazards, and other opportunities in the nearby area that are more attractive."⁴

Comments on the Draft Environmental Assessment

We provide the following comments on the specific purposes outlined for the Draft EA:

1) Establish a final river corridor boundary

We support the proposed boundary adjustment proposed in the Draft EA to better provide for protection and enhancement of river values.

It is possible that a segment of the river downstream that is currently not designated as Wild and Scenic will be designated as such in the future. The Draft EA should address this by including more explicit language to clarify that the CRMP applies only to the boundary identified in the Draft EA. Along these lines, the Draft EA should also clarify that any future extensions of the designated river corridor would trigger development of a separate CRMP for the new segment (as an amendment to the Forest Plan) with its own standards and guidelines.

2) Understand desired future conditions within the river corridor;

² <https://www.rivers.gov/wsr-act.php>

³ At Page 25, Bennett, J. and T. Bennett. 1997. A Guide of the Whitewater Rivers of Washington, Second Edition. Swiftwater Publishing Company.

⁴ At Page 10, Draft EA

The standards and guidelines note that “any recreation sites should blend with the natural landscape, and be screened from the river” and “new opportunities for hiking, mountain biking or equestrian uses may be considered.”⁵ While we support the finding that “the current level of use [by whitewater boaters] does not warrant developed access at this time,”⁶ it is not uncommon for a CRMP to remain in place for decades with no updates (in our experience a CRMP is rarely updated even when the Forest Plan for the unit is updated). Outdoor recreation, and whitewater boating specifically, can change significantly over the life of a CRMP. We are concerned that this language in the standards and guidelines could preclude future opportunities to improve access to the river for whitewater boaters if desirable and warranted in the future. Specifically, a formalized trail to the river at or near the Forest Road 8031 bridge could be precluded under a standard where such a trail is visible (i.e. not screened) from the river. Additionally, accommodations for potential hiking, mountain biking, and equestrian use without mention of the existing activity of whitewater boating represents an inconsistency that should be addressed.

We recommend that language be modified to state that “any recreation sites should blend with the natural landscape, and be screened from the river to the extent feasible” and “new opportunities for hiking, mountain biking, or equestrian use or enhancement of existing whitewater boating may be considered.” This would be consistent with the rationale expressed in the standards and guidelines of keeping options open for the future.

3) Establish consistent and inconsistent uses within the corridor

We request that whitewater boating be explicitly identified as a use consistent with the management goals in the CRMP. As drafted, consistent uses are identified as “hiking, backpacking, mountain biking or equestrian riding.”⁷ Whitewater boating would not damage geological features, leave evidence of human activity noticeable to the casual observer, or impact shoreline vegetation or water quality. Given that other activities are specifically identified as consistent, we request that whitewater boating be specifically named. As the Draft EA notes, “public feedback has indicated there is significant interest around [whitewater boating].”⁸

We agree that on the upper White Salmon River, “wood and other natural hazards are an expected and integral part of this experience for those who do run this stretch of river.”⁹ We concur with the statement that “kayakers did not express a desire for woody debris removal and expressed their desire to maintain and improve the river system, even if it means they face greater challenge on certain

⁵ At Page 18-19 under Recreation and Special Uses Proposed Standards and Guidelines, Draft EA

⁶ At Page 2, Appendix A Public Involvement Feedback

⁷ At Page 23, Draft EA

⁸ At Page 10, Draft EA

⁹ At Page 19 under Recreation and Special Uses Proposed Standards and Guidelines, Draft EA

reaches of the river due to woody debris.”¹⁰

The Draft EA notes the “development of significant facilities or developed recreation sites that might be viewed from the river would not be consistent.” As noted above, we believe this statement should be amended to include the possibility for a future trail that provides access to the river.

4) Amend the Gifford Pinchot Land and Resource Management Plan with new standards and guidelines specific to the upper White Salmon Wild and Scenic River corridor

We support the approach discussed in the Draft EA to implement the CRMP as a Forest Plan amendment.

5) Determine recreational use capacity

The Draft EA sets the capacity for whitewater kayaking at 250 whitewater kayakers per year, but provides no information to support this number. Carrying capacity is generally defined as the level of use beyond which impacts exceed standards.¹¹ While 250 kayakers per year is above the existing use that occurs, the Draft EA should provide information for why exceeding this number would lead to a level of impact that would exceed standards.

As users who spend limited time in one location, whitewater boaters generally have a low impact as they travel through the landscape on the water’s surface. Due to this fact, whitewater boating generally has less of an impact on issues like soil compaction and reduction of ground cover, both of which represent recognized impacts of dispersed camping. The Draft EA sets a capacity of 11,088 dispersed campers, which seems much more significant than kayakers who pass through the landscape on the water and engage in a day-use activity.

We note that the Draft EA provides limited information to support the capacity for dispersed camping as well. The Draft EA should provide more information to support the basis for the capacity limits for all recreational use.

6) Develop a monitoring plan related to management and recreational use within the corridor.

We support the monitoring plan elements identified in the Draft EA.

Conclusion

¹⁰ At Page 3, Draft EA, Appendix A, Public Involvement Feedback

¹¹ Shelby, B. and T.A. Heberlein. 1986. Social carrying capacity in recreation settings. Oregon State University Press, Corvallis, OR.

Thank you for the opportunity to provide scoping comments on the Comprehensive River Management Plan (CRMP) for the White Salmon River and Cascade Creek Wild and Scenic Rivers. We are strong supporters of protecting this resource in a manner that allows the public, and particularly whitewater boaters, an opportunity to directly experience this special place.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a long horizontal flourish extending to the right.

Thomas O'Keefe, PhD