



www.americanwhitewater.org

Dave Steindorf
California Stewardship Director
4 Baroni Drive
Chico, CA 95928
530-343-1871
dave@americanwhitewater.org

August 28, 2013

Inyo National Forest

Sent via e-mail to Comments-pacificsouthwest-inyo@fs.fed.us

Re: Inyo National Forest Planning

Dear Forest Service Planning Staff,

American Whitewater would like to thank USFS staff for the opportunity to provide these comments on the assessment phase of this new Forest planning process for the Inyo National Forest. As we understand the assessment phase of the new Forest Planning process, you are now seeking pre-existing information that can help form the factual basis for the remainder of the planning process, as well as some high-level comments on topics we would like the plan to cover. Our comments seek to provide exactly this type of information and context.

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 5,500 members - typically non-commercial kayakers, rafters, and canoeists - many of whom regularly paddle rivers flowing through the Inyo National Forest. We look forward to working with the Forest Service and the public in developing a protective and nationally consistent management plan for the Inyo National Forest, and the others located within the Sierra Bio-region.

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.

1. Whitewater Paddling Across the Forests and Region

The south 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 Kern River and its tributaries in particular offer paddlers a vast array of unique and high quality whitewater paddling opportunities in a highly scenic setting. Paddling resources exist in the region on Forest Service, Park Service, State, and private lands. The Inyo National Forest offers paddlers spectacular rivers and scenery with assured legal access.

Currently, the Wiki pages largely overlook whitewater paddling. 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 These resources provide information that can help inform the Forest Planning process.

2. Wild and Scenic Suitability

The BioRegional Wiki page states that completing suitability in the land management planning process is the “preferred approach” recommended in the Forest Service Handbook. Suitability determinations are relatively resource intensive analyses most often conducted in response to a proposed water resource or other natural resource development. These determinations—which include ever changing factors like politics, economics, and recreation—offer a snapshot of conditions at the time of the analysis. Eligibility is based on the free flowing nature and outstanding value of the river.

In our experience, it has long been USFS practice to defer suitability, and we find this to be environmentally responsible, consistent with the Wild and Scenic Rivers Act, and fiscally conservative. As a matter of policy, we have asked that the draft Forest Service Handbook and Manual be modified to clearly state that suitability determinations are optional and best deferred until they are needed.

The BioRegional Wiki states that the following creeks are eligible as Wild and Scenic with incomplete suitability studies within the Inyo National Forest: Lee Vining, Golden Trout, Walker Creek, Upper Parker, South Fork Bishop, Cottonwood, Big Pine, Lone Pine, South Fork Mill, Convict, Hot, Rock, Mill, Laurel, and McGee. To our knowledge, there are no active hydropower proposals that would conflict with eligible river status for these streams. Suitability determinations are not timely or necessary on the Inyo National Forest and the others in the region. We request that the Forest Service not pursue suitability determinations for any streams found eligible at this time. Suitability should be deferred until triggered by a conservation or development proposal, because suitability involves an economic and political snapshot that is irrelevant to the stream’s long-term merit for inclusion in the system.

3. Wild and Scenic Eligibility Inventory

The Forest Planning Rule requires that an updated inventory be included as an appendix in all new forest plans. Where past inventories have been completed, new information and/or changed conditions should trigger updates to the inventory. Many factors have changed since the last Forest Plan was finalized over two decades ago, including recreational changes and an increased understanding regarding climate change. As a result, an updated inventory is timely.

The Middle Fork of the San Joaquin River, which flows through the Inyo National Forest, Devil’s Postpile National Monument, and the Sierra National Forest, 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.³

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

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

³ <http://www.americanwhitewater.org/content/River/detail/id/290/>

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 the National Whitewater Rivers Inventory⁴ and The Best Whitewater In California⁵ to gain a better perspective of the recreational opportunity this river offers, and update their Wild and Scenic River eligibility inventory based on this new recreational information.

4. Management of Wild and Scenic Rivers on the Forests

The Inyo National Forest manages portions two Wild and Scenic Rivers that are of vital importance to paddlers: the North and South Forks of the Kern. These rivers are managed under Comprehensive River Management Plans (CRMPs) that were written 20 years ago, and, according to the Wiki, the ORV's fail to mention the value they provide for whitewater recreation. Given the changes in river management practices, demographics, recreational preferences, and other management issues since that time, it is likely that these plans are out of date. We request that these plans be updated concurrently with Forest Planning. Doing so 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.)

One particular management anomaly indicates a potential need for updating the plans. The Forks of the Kern are managed in a way that limits private boating to 15 people per day (one of the most restrictive direct limits on non-commercial paddling in the United States), while hikers, anglers, horseback riders, and any other visitors are subject to no direct limits. Paddling is only targeted for unique direct limits when it has been shown to exceed a river's capacity while other visitors have minimal contributions to capacity. This does not appear to be the case on the Forks of the Kern, however monitoring data should be able to inform a fresh hard look at this issue to assess and if justified adjust this management policy.

We look forward to continuing to work with the Inyo National Forest on developing a comprehensive list of rivers that have whitewater recreational value. Thank you for considering these comments.

Sincerely,



Dave Steindorf
California Stewardship Director



Megan Hooker
Associate Stewardship Director

⁴ <http://www.americanwhitewater.org/content/River/state-summary/state/CA/>

⁵ Holbeck, Lars and Stanley, Chuck, The Best Whitewater in California: The Guide to 180 Runs, 3rd edition. Watershed Books, 1998.