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Inyo National Forest  
[comments-pacificsouthwest-inyo@fs.fed.us](mailto:comments-pacificsouthwest-inyo@fs.fed.us)

### **Re: Inyo National Forest Draft Assessment Comments**

Dear Inyo National Forest Planning Staff:

American Whitewater appreciates having the opportunity to provide feedback and information about Inyo National Forest Draft Assessment. There are a number of rivers on the Forest that have important value as whitewater resources, and we look forward to working with the Forest to ensure that whitewater boating is recognized as an activity on these rivers in the Inyo National Forest Plan.

#### **Recognizing Whitewater Recreation as an Activity on the Forest and Value of its Rivers**

In our August 28, 2013 comments, we noted that the Wiki Pages largely overlooked whitewater boating as an important activity on the Inyo NF. We note that whitewater boating is still largely missing from the Draft Assessment and Chapters 9 and 15 of the updated topic papers. We recommend that whitewater recreation be recognized as a non-motorized activity on the Forest in Chapter 9, and as value on recommended and designated Wild and Scenic rivers on the Forest, including the Middle Fork of the San Joaquin River, Middle Fork and South Fork Kern Rivers. More information about the importance of these runs and others throughout the region is available in American Whitewater's National River Database.<sup>1</sup> This inventory also has a geospatial Google Earth layer associated with it that can be downloaded at the bottom of the above referenced page.<sup>2</sup> These resources provide information that can help inform the Forest Planning process.

#### **Updating Wild and Scenic River CRMP's and the Forest Plan Concurrently**

We continue to recommend that Inyo NF work with the Sequoia NF to update the 1994 Comprehensive Management Plans for the Wild and Scenic South Fork and North Fork Kern Rivers concurrently with the Forest Planning process. Primarily, we believe this is necessary in order to revisit the limit of 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. None of these other activities have limitations imposed upon them,

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

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

and 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.

Given the changes in river management practices, demographics, recreational preferences, and other management issues since these plans were finalized in 1994, it is likely that these plans are out of date beyond the issues we have raised. 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).

## **Eligible Rivers**

### **A. Recognizing Whitewater Recreation as an Outstandingly Remarkable Value on Eligible Rivers**

Hot Creek is an eligible river that provides an outstanding Class II whitewater opportunity during the spring peak runoff. Boaters put in downstream of Hot Creek Ranch where public access begins, and make the run down to Owens River Road. The creek winds through a unique canyon with stunning geologic, hot springs and plentiful wildlife. We recommend that the eligibility documents are updated to reflect these values.

### **B. Suitability Studies**

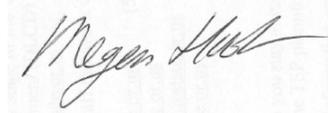
We continue to recommend that Inyo NF delay action to conduct suitability studies on rivers that have been found eligible for inclusion in the federal Wild and Scenic River System. Suitability involves an economic and political snapshot that is irrelevant to the stream's long-term merit for inclusion in the system, and should therefore be deferred until it is triggered by a conservation or development proposal. Suitability determinations are also resource intensive. 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.

Thank you for considering our comments on the Draft Assessment. We look forward to continuing to work with you throughout the Forest Planning process.

Sincerely,



Dave Steindorf  
California Stewardship Director



Megan Hooker  
Associate Stewardship Director