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October 22, 2013

Sequoia National Forest

Sent via e-mail to comments-pacificsouthwest-sequoia@fs.fed.us

Re: Sequoia National Forest Draft Assessment Comments

Dear Forest Service Planning Staff,

American Whitewater would like to thank USFS staff for the opportunity to provide comment on the Draft Assessment for the Sequoia National Forest. There are a number of rivers on the Forest that are important whitewater resources, and we appreciate the Forest's efforts to include whitewater recreation in the Draft Assessment.

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 - many of whom regularly paddle rivers flowing through the Sequoia National Forest. In addition, we are partners in managing the Kern River, where we have invested significant effort into flow restoration and/or management. We look forward to working with the Forest Service and the public in developing a protective and nationally consistent management plan for the Sequoia National Forest, and the others located within the Sierra Bio-region.

We seek clarification and a better understanding about the role of the Wiki pages in relationship to the Draft Assessment and Final Assessment. The Draft Assessment refers back to the Wiki in a number of places, and we are unclear about whether the Wiki is formally part of the Draft Assessment, and whether it will be integrated into the final document or used by reference. Additionally, we seek clarification about how long the Wiki pages will remain live throughout the process, and whether making changes to the Wiki at this point is still timely.

Whitewater Recreation on Eligible, Suitable and Designated Rivers

We are pleased to see that the Middle Fork Tule, Mill Flat Creek, Brush Creek, Dry Meadow Creek and segments of the Kern and Kings Rivers are included in the Draft Assessment as rivers that warrant serious consideration for their eligibility within the Wild and Scenic Rivers system. We also were pleased to see that whitewater activities on the Forest received increased mention in the Draft Assessment, and we encourage the Forest to continue to consider the activity moving forward throughout the planning process.

There are additional areas throughout the Draft Assessment where whitewater recreation should be noted. In Chapter 7: Benefits to People, the Draft Assessment notes that each of the six hydropower projects within the forest plan boundary have minimum in-stream flow requirements

for fish. The Draft Assessment should also note that there are whitewater recreation releases at Southern California Edison's KR 3 Hydropower Project (FERC # 2290) and the possibility for future releases at Isabella Dam. See our comments in our letter dated August 1, 2013 regarding the Wiki for more information.

We appreciate that the Draft Assessment highlights the importance of whitewater recreation opportunities on the Tule River and tributaries of the Kern on page 203. However, we note that the remaining river descriptions throughout the Draft Assessment (including the Wild and Scenic North Fork and South Fork Kern Rivers and Kings and South Fork Kings, and eligible and suitable segments) contain no mention of their significance as whitewater recreation resources. The Draft Assessment refers back to the Wiki pages for additional information about the rivers. While the Wiki makes some progress in noting the value the rivers of the forest provide for whitewater recreation, such as the description for the Lower Kern (lines 423, 432 and 466) and in the introduction to the Kings River (lines 296-300), there continue to be places where the Wiki is also missing important whitewater information.

We echo our comments during the initial assessment from August 1, 2013, and continue to encourage the Forest Service to make use of American Whitewater's National Whitewater Rivers Inventory, which offers a relatively comprehensive view of paddling in California.¹ This Inventory has a geospatial Google Earth layer associated with it that can be downloaded at the bottom of the above referenced page.² The information in the Inventory can help inform the Forest Planning process about the recreational value of the rivers on the forest. Specifically, we direct you to information for the South Fork Kings River³ and Middle Fork Tule,⁴ and South Fork Kern,⁵ and North Fork Kern Rivers.⁶

Additionally, there are a few specific corrections needed regarding whitewater in the Wiki. We are happy to make these comments and changes directly in the Wiki, if still timely.

- At line 299, the Wiki states that "whitewater rafting exists in the lower reaches of the [Kings] river corridor." We note that additional forms of whitewater recreation take place on both the upper and the lower reaches of the river, and on the South Fork within Sequoia NF,⁷ and on the Middle and North Forks in Sierra NF.⁸

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/230/>

<http://www.americanwhitewater.org/content/River/detail/id/231/>

⁴ <https://www.americanwhitewater.org/content/River/detail/id/5091/>

<http://www.awetstate.com/MTule.html>

⁵ <http://www.americanwhitewater.org/content/River/detail/id/2607/>,

<http://www.americanwhitewater.org/content/River/detail/id/2604/>

⁶ <http://www.americanwhitewater.org/content/River/detail/id/216/>,

<http://www.americanwhitewater.org/content/River/detail/id/217/>

⁷ <http://www.americanwhitewater.org/content/River/detail/id/230/>

<http://www.americanwhitewater.org/content/River/detail/id/231/>

⁸ <http://www.americanwhitewater.org/content/River/detail/id/230/>

<http://www.americanwhitewater.org/content/River/detail/id/231/>

- We're pleased to see updated information about boating overall and rafting in particular on Segment 2 of the Kings River⁹ (lines 325 to 328). However, at line 323 the Wiki continues to state that "rafting does not occur on [Kings River Segment 2] due to the hazards involved and the lack of access." We recommend that the statement that rafting does not occur on this segment be removed from the Wiki.
- At line 320, the Wiki states that "access to Segment 2 [of the Kings River] is restricted to the Yucca Point Trail. The Wiki should also note that access to the river corridor is also available by whitewater craft to those with the skills, expertise and necessary equipment to navigate the river.
- At line 341, the Wiki states that there is no access into Segment 1 of the South Fork Kings River. While access may be difficult, it does exist. Whitewater boaters with the skill, expertise and necessary equipment to navigate the river are able to access this segment of the South Fork Kings River.¹⁰
- The description of Segment 1A of the South Fork Kings (lines 344 to 354) mentions whitewater and that it attracts photographers. Whitewater recreation should also be noted for this segment.

Detailed Suggested Edits

The Draft Assessment states that only the Lower Kern is eligible for Wild and Scenic on page 201, yet on page 205 states that both the Kings and Lower Kern Rivers are eligible. Further, on page 201 the Draft Assessment lists the South Fork Kern, North Fork Middle Fork Tule and North Fork Tule as Suitable, while page 205 also lists the Little Kern Segment as Suitable. The two sections should be consistent, or if they are intentionally different, be clearer about the reasons why.

In the initial assessment phase, we noted that the Wiki states that there are river segments that are "potentially eligible pending suitability studies." On the Wiki, we commented that this was confusing two different aspects of the Wild and Scenic Rivers Act. While this language is still in the Wiki (line 497), we appreciate the attempt to update this language in the Draft Assessment, which reads "Potential designated areas that may be considered." While an improvement, this language is still confusing. We suggest instead simply using a header that says "Eligible and Suitable Rivers," and then providing an explanation of what that means, if necessary.

We look forward to the next steps in the Planning Process, and to addressing issues regarding permitting on the Forks of the Kern, and discussing the option of a parallel process to update the Wild and Scenic River Management Plans. We appreciate your consideration, and welcome you back!

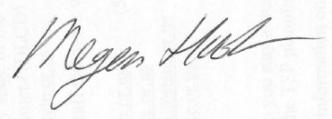
Sincerely,

⁹ <http://www.americanwhitewater.org/content/River/detail/id/224>

¹⁰ <http://www.americanwhitewater.org/content/River/detail/id/230/>
<http://www.americanwhitewater.org/content/River/detail/id/231/>



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