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Liz Van Genderen
Helena National Forest
2880 Skyway Dr.
Helena, MT 59602

Submitted electronically to: hcplanrevision@fs.fed.us

Re: Wild and Scenic River Eligibility Study

Dear Ms. Genderen,

American Whitewater is a national non-profit organization dedicated to protecting and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely. Our members are primarily conservation-oriented kayakers, rafters, and canoeists. Our community has a long history of supporting the protection of rivers using the Wild and Scenic Rivers Act because dams have so profoundly impacted the rivers and streams whitewater paddlers especially cherish: the wild, steep, and boldly flowing ones. Wild and Scenic eligibility is a vital tool for setting some outstanding streams beyond the reach of hydropower developers until Congress can consider designation. In recent years American Whitewater has challenged numerous dams in Montana and Idaho, which serves as reminder that Wild and Scenic eligibility is both timely and important.

The eligibility study rarely mentions paddling values of rivers and streams. Through these comments we hope to inform the Forest Service of these values, and we hope to see them reflected in the final study.

As a steering committee member of Montanans for Healthy Rivers (MHR) we partner with many local, state, and national groups to support the protection of a system of Montana's last best rivers. In countless meetings around the state we have found overwhelming support for use of the Wild and Scenic Rivers Act to protect the state's last best rivers. MHR has created a Citizen's Proposal for new designations based on what we heard from Montanans. We would like to point out that MHR did not address the Rocky Mountain Front in our 5 years of outreach out of deference to efforts to pass the Rocky Mountain Front Heritage Act and because we simply lack capacity. The absence of rivers on the Front from our proposal is a matter of timing, and in no way reflects negatively on the incredible merit of many Rocky Mountain Front rivers.

Wild and Scenic Eligibility Process Comments

We would like to raise two primary concerns with the process used to identify eligible streams.

First, recreational values were considered sufficient if they were a) popular, b) rare, or c) unique. This is an overly narrow perspective. The typical standard for Outstanding Remarkable Values (ORVs) is “rare, unique, or exemplary.”¹ Exemplary is a concept missing from the eligibility criteria, and an important concept in these Forests. We feel that popularity is a poor analog for recreational quality. Some of the most outstanding and high quality recreational resources are too remote, too unknown, or too challenging to be popular at a coarse scale. We feel that the fact that a place is unpopular can be a value itself, offering outstanding opportunities for solitude and adventure. This is indeed the case on the Forests. Likewise the criteria of rarity or uniqueness may also fail to miss high quality recreational opportunities. The goal is to protect a suite of “outstanding” and “remarkable” streams, so we request that the Forests integrate those words or the term “exemplary” back into the eligibility criteria.

Step 5 (Determining the level of importance of the ORVs) should be struck in its entirety. If a free-flowing river has an ORV it is eligible. Relative importance is irrelevant. This concept is not consistent with the Directives or how other Forests are approaching eligibility. We encourage you to review the process being used by the Nantahala and Pisgah national forests in North Carolina as a good example of the standard approach.

Moreover, hinging “importance” purely to how far people travel to recreate in the case of scenery and recreation ORV’s ignores rare, unique, or exemplary recreational opportunities that justify an ORV regardless of popularity or travel distances. We recognize that defining recreational quality is qualitative, subjective, and challenging. Demand and travel times people are willing to endure do in some cases objectively indicate quality. But there are other high quality resources, especially in remote areas for which these metrics fail to identify outstanding recreational values.

Comments on Specific Streams & Values

Rivers of the Rocky Mountain Range

The Rocky Mountain Front holds some of the best whitewater paddling in Montana and the Northern Rockies. Through these comments we hope to convey the richness of these opportunities, and highlight the outstandingly remarkable recreational and other values of several specific streams on the Front, in support of eligibility determinations.

First it should be said that paddling values on the Front may not be obvious to planners or even many paddlers. Paradoxically, the lack of a guidebook for the region has kept use quite low, yet offered incredible adventure for those who chose to explore the rivers and streams. The area is relatively far from population centers, as well as popular

¹ See Forest Service Handbook, 1909.12.82.72:
http://www.fs.fed.us/im/directives/fsh/1909.12/wo_1909.12_80.docx

whitewater rivers that can serve as hubs of exploration. The paddling season is quite short on smaller streams, and earlier than elsewhere in the region. And access hurdles imposed by private property and roadless headwaters make for some long hike ins and paddle outs, further limiting use. None of this though is to say that paddling on the Front is anything short of stunning and of the highest quality. It just isn't easy, but then, the best adventures in the wildest places never are.

Rivers on the Front share some general characteristics that make most of them rare, unique, and exemplary when compared to the region of comparison (the rest of Montana). Consider the following values shared by many Rocky Mountain Front streams.

They have almost no wood. Montana streams are often chocked full of logs to the extent they are non-navigable and/or very dangerous. Trees in streams are called strainers because water goes through them but paddlers often do not. Strainers are a leading cause of paddling deaths. Entire mountain ranges in Montana (like the Bitterroots) offer few headwater paddling opportunities because of the naturally occurring wood in streams. Not so on the Front. The dry, rocky and windswept country naturally introduces very little wood in rivers and streams, and paddlers are treated to open lines through open country.

They are limestone. A river's substrate is akin to its bone structure. Each type of rock creates distinct types of rapids and related paddling experiences. Limestone creates wonderful drop-pool sequences in sculpted bedrock canyons. This limits the dangers associated with continuous whitewater, sharp talus, undercut rocks and sieves, which are common elsewhere in Montana, thus creating relatively safe conditions. It also creates high quality waterfalls, slides, and rapids with distinct, enjoyable, and memorable lines.

They are remote. With the exception of the forks of the Teton and the South Fork of the Sun, all the rivers on the Front require significant hiking to get to the put in. The advent of pack rafting has made paddling many of these streams easier, but challenges still abound. Whether hiking or horse-packing in with kayaks or pack rafts, the Front offers some of the most remote paddling opportunities in the lower 48. And of course there are no people. In nearly a decade of paddling on the Front, I honestly can't recall ever seeing other person, on or off the water.

They are beautiful. There is simply nowhere else in the world like the Front. Paddlers are granted spectacular views and experiences while hiking, camping, and especially paddling through open valleys surrounded by snowcapped peaks, and approaching and then paddling through towering pale limestone reefs in narrow canyons with gushing springs and polished alcoves. Each reef offers its own mystery and challenge, while each valley between the reefs offers unique vistas, contemplative floating, and fine camping. And of course, there are the bears, moose, wolves, and other wildlife that greatly enliven the landscape.

- **Recreational ORV:** We fully support eligibility and request that a recreation value be added to the Middle Fork of Birch Creek. The Middle Fork and South Fork together or independently are outstanding whitewater paddling resources. The run on the Middle Fork begins around 2 miles upstream of the confluence with the South Fork, and features Class III+ whitewater in valley that looks more like Alaska than Montana.



- The river corridor is uniquely open due in part to 1960's extreme flooding, and the surrounding mountains are largely treeless. The Class III+ culminates in a classic IV+ triple drop rapid with each drop around 6 feet in height. Paddlers are then treated with a descent through a Class III slot canyon for several hundred yards. The chance to experience moderate whitewater in an easily scouted narrow slot canyon is a real treat, and very rare in Montana. Camping near the confluence is outstanding and allows for multiple descents of the Middle and/or South forks.
- **Scenery ORV:** For reasons similar to the recreation ORV, we support the proposed scenery ORV. The Middle Fork offers views of the rapids and waterfalls and the surrounding rocky terrain. The valley has fewer trees and more of the characteristic reef views than any other watershed on the Front.
 - For more information, please view the film we made of the Middle Fork: <https://vimeo.com/92275837>

- **Recreational ORV:** We concur that the South Fork is of national interest and high use as a scenic route to the Chinese wall. It is also an outstanding whitewater paddling resource. The run boasts two vertical drops that are ideal for pack-rafting or other forms of paddling. First a slide leads into a 6-8 foot vertical drop landing in a deep pool. Then, the Creek drops off a gorgeous 15-foot waterfall at the highly scenic confluence with Phone Creek. There are no other waterfalls like this on the Front, and very few in Montana: clean, straightforward, moderate/safe height, with easy rescue options. The waterfall alone makes the run rare and exemplary, but the setting and other offerings are equally sublime.



Below the falls is a dramatic gorge with an easy portage and a mellow paddle out to the confluence with the Middle Fork and then to Swift Reservoir. Together with the Middle Fork, the South Fork offers the best whitewater for the shortest hike on the Front, all in a spectacular valley with great camping.

- **Scenery ORV:** For reasons similar to the recreation ORV, we support the proposed scenery ORV. The waterfall and peak views are unique and outstanding.
- For more information, please view the film we made of the South Fork: <https://vimeo.com/105175310>

South Fork Dupuyer Creek

Free-Flowing

ORV: R,G

We request that South Fork Dupuyer Creek be reconsidered for eligibility based on the values described below.

- **Recreational ORV:** The South Fork is small to be sure, but it makes an outstanding packrafting day trip during the higher end of spring snowmelt when most other rivers are too high. A beautiful and easy hike over a mountain pass from Blackleaf Canyon delivers visitors to the park-like South Fork Dupuyer valley above the imposing final reef. Mild paddling leads boaters to a small unrunnable drop that is easily portaged, followed by a fun Class II/III descent through an extremely narrow slot canyon that proves to be the crux of the run. After that a handful of great Class III/IV drops lead one past a gushing spring and onto the plains. From there it is a very different but equally beautiful hike back to Blackleaf Canyon across the eastern base of Mount Frazier. Together this makes for a stunning and diverse circumnavigation of the 8,327-foot tall Mount Frazier of a length that makes for an ideal day trip.
- **Geological ORV:** The South Fork Canyon has one of the largest and most dramatic springs that we have witnessed on the Front. Water gushes from a cave exit roughly the circumference of a basketball under an alcove and tumbles down 20 feet or so to the South Fork of Dupuyer over a fan waterfall covered in lush vegetation. Springs like this are characteristic of the karst limestone geology of the Front, but the spring's volume and visual impact on the South Fork of Dupuyer Creek qualify as value that could qualify as an ORV. The South Fork canyon itself also features many of the characteristics of a reef canyon on the Front: a vertical falls dropping into a polished slot canyon, numerous waterfalls and small slides, boulder rapids, towering cliffs overhead, and park-like valley upstream of the final reef.



North Fork Teton River**Free-Flowing****ORV: R**

We request that the North Fork of the Teton River be reconsidered for eligibility based on the values described below.

- **Recreational ORV:** The North Fork of the Teton is one of the few and best roadside rivers on the Front, except for its highly scenic Box Canyon which offers several miles of roadless paddling. The entire river is constant class II-III, easily scouted, without wood or other objective hazards, and has a gage on it. These factors make the North Fork of the Teton the best choice for “normal” whitewater paddling not requiring hiking in, paddling out, or dealing with the claustrophobia of remote committing canyons. The river is on par with the hugely popular Blackfoot in terms of quality and difficulty of whitewater. The scenery though is classic Rocky Mountain Front, and even while paddling next to the road one can float through dramatic reefs. We feel that the North Fork deserves a recreation ORV.

**North Fork Deep Creek****Free-Flowing****ORV: R,S,G**

- **Recreational ORV:** We fully support eligibility and request that a recreation value be added to the North Fork of Deep Creek. The North Fork is truly a pack-rafting treasure, and would be a kayaking treasure as well for those able to get a kayak over the high mountain pass at the top of Green Gulch. The North Fork of Deep Creek is laterally extremely committing (climbing up and out would be harrowing or impossible in many locations), but paddlers can easily portage and scout at river level, even though massive walls tower overhead. The grandeur of the scenery and feeling of isolation at the bottom of the canyon is quite possibly peerless in Montana paddling. And all the while, the whitewater is outstanding and runnable. Only one short optional portage at the canyon exit is



required, while the rest of the run features everything from small waterfalls to twisting slides to boulder rapids, all in the moderate but exciting Class III-IV+ range. In total the North Fork is a 20-mile journey (10 paddling, 10 on land) that is exemplary by any standard.

- **Scenery ORV:** Scenery: For reasons similar to the recreation ORV, we support the proposed scenery ORV. The North Fork of Deep Creek boasts some of the tallest vertical limestone walls in Montana and a unique tower and fallen wall at the canyon's exit. The trees clinging to the walls are stunted into banzai-like shapes, and the scenery is dominated in places by the geomorphological processes of flooding, rock-fall, and erosion.
- **Geological ORV:** We ask that the USFS consider a geology ORV for the North Fork of Deep Creek for the massive canyon, rock tower, toppled wall, and interesting structures in the limestone near the canyon exit.

South Fork Deep Creek

Free-Flowing

ORV: G

- **Geological ORV:** The South Fork of Deep Creek has an extremely narrow walled slot canyon as it slices through the final reef. It is the only stream on the Front that a person can't relatively easily traverse at or near river level. The tortured path taken by the creek is unlike any other stream in Montana in that regard.



North Fork Sun River

Free-Flowing

ORV: R

- **Recreational ORV:** The North Fork's open parks and big volume make for superb floating, camping, and hunting. As a long and large river with only one short section of significant whitewater, the North Fork serves as a valued paddling route out of the Bob Marshall Wilderness for paddlers traversing from west to east. The final series of rapids though is, like the South Fork, a significant challenge and very high quality whitewater.

South Fork Sun River

Free-Flowing

ORV: R

- **Recreational ORV:** The South Fork of the Sun is the only remote river on the Front that has road access, with the exception of the North Fork of the Teton's relatively short but lovely Box Canyon. This facet of the river actually makes it quite rare in Montana where most runs equally remote require flights or long hikes to reach them. This makes the run accessible to far more people than other runs of equal remoteness. The hurdle of course comes at the end of the run, when paddlers must traverse 5 miles of Gibson Reservoir to reach their car in boats not designed to easily paddle on flatwater. The South Fork though, with its scenic floating, relatively easy access, remoteness, and exciting final canyon

is more than deserving of being considered eligible for Wild and Scenic designation.

Dearborn River

Free-Flowing

ORV: R

- **Recreational ORV:** We fully support eligibility and request that a recreation value be added to the Dearborn River. The Upper Dearborn has long been a whitewater paddling destination, despite the carry-in. The fact that kayakers have long lugged 70 pounds of boat and gear four miles to paddle the river should be some indication of the quality of experience. The run is classic Rocky Mountain Front Paddling, with big open views, no strainers, bedrock slides and falls, remarkable water quality, and several slot canyons of varying difficulty. One, the pinch of Devil's Glen itself is Class V, but the rest of the run is easily scouted class IV or IV+ depending on flows. The recreational value of the Dearborn is enhanced by a nice legal trailhead that offers paddlers, hikers, and others relatively easy access to the region. It is also the closest river on the Front to Missoula and other towns.
- For more information, please view the film we made of the Dearborn: <https://vimeo.com/100236669>
- See also the American Whitewater webpage for this river reach: <http://www.americanwhitewater.org/content/River/detail/id/4358/>



Other Rivers in the Planning Area

Smith River

Free-Flowing

ORV: R,S,G,W,C

In speaking with Montanans about rivers they deeply value, the Smith River comes up extremely often, and for good reason. The Smith is so desirable that a rare limited-entry permit system is required for floating it. The reasons for this appeal goes beyond excellent fishing – it is a great family-friendly multi-day float trip with great camping and beautiful scenery. The Smith is part of MHR's draft Wild and Scenic Rivers proposal and we strongly support the eligibility of the Smith River.

See also the American Whitewater webpage for this river reach: <http://www.americanwhitewater.org/content/River/detail/id/1021/>

Tenderfoot Creek

Free-Flowing

ORV: S,R,F

We agree that Tenderfoot Creek has outstanding scenic and recreational values for the reasons stated in the study. The Creek offers great opportunities for

hiking, swimming, fishing, and likely paddling as well. We would note that the study lists rainbow trout spawning as a fisheries value, however we view that as a recreational value since rainbow trout are a non-native fish with positive recreational value but negative ecological value. We ask that this be corrected in the study. Tenderfoot Creek is part of MHR's draft Wild and Scenic Rivers proposal and we strongly support the eligibility of the Tenderfoot Creek.

Additional Comments:

We have commented on the rivers and creeks we know well and about which we have valuable information to share. More generally though, we support many of the eligibility findings and recommendations in the study. The fisheries information is consistent with our knowledge on the topic, and it makes sense to protect a suite of streams that are vital for spawning and the conservation of genetic purity and diversity. As an example we fully agree that the Blackfoot River headwaters proposed for eligibility merit protection for their fisheries values.

Conclusion

Thank you for considering these comments, and for your very solid work on the draft eligibility study. The remaining free-flowing streams in the Helena and Lewis and Clark national forests are among the wildest and most spectacular streams in the United States. We ask that the Forest Service protect at least the rivers listed above as a system of outstanding rivers and streams set aside from future development.

Sincerely,



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