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BLM Cottonwood Field Office  
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Submitted Via Email to: [comments@cottonwoodrmp.com](mailto:comments@cottonwoodrmp.com)

Re: Draft RMP/EIS

I have reviewed the Bureau of Land Management - Cottonwood Field Office's Draft Resource Management Plan and Environmental Impact Statement on behalf of American Whitewater. American Whitewater is a national nonprofit organization dedicated to protecting and restoring our nation's whitewater resources while enhancing opportunities to enjoy them safely. We have approximately 6,800 members and over 110 affiliate clubs. Most of our members are conservation oriented, non-commercial whitewater boaters, and a significant portion of our membership lives and/or recreates on lands and waters managed by the CFO. The actions recommended in the Draft RMP/EIS therefore will directly affect our members.

I have personally lived very near the CFO for the past two years in Moscow Idaho, and have lived within a day's drive of the CFO for three additional years. My current residence is in Missoula, Montana. In these years, I have had the pleasure of paddling and otherwise visiting many rivers in the CFO. Based on these experiences and 10-years of experience in restoration ecology, I offer the following comments on behalf of American Whitewater.

### **Wild and Scenic Rivers:**

We fully support the finding that Lolo Creek, Hard Creek, Hazard Creek, and Lake Creek are suitable for designation as Wild and Scenic Rivers. Each of these streams fully deserve designation as Wild and Scenic.

The beauty, remoteness, and uniqueness of Lolo Creek cannot be overstated. Having personally paddled the lower reach of the Creek, I fully agree that Lolo Creek and its canyon are a national treasure worthy of protection. Lolo Creek is among the finest creek boating opportunities in Idaho and the entire region. Its long length, countless rapids, lack of portages, stunning scenery, good water quality, fish and wildlife viewing opportunities, and inaccessibility between access points all contribute to its value as a whitewater boating resource. In addition, the canyon offers a diverse landscape of

mature ponderosa pine forests, massive cedar trees, moss covered cliffs, canyon grasslands, and areas of lush deciduous riparian trees.

Protection as a Wild and Scenic River (or a W&S suitable river) may help protect Lolo Creek from additional impacts to water quantity, water quality, housing development, and logging. Furthermore, protecting the Creek from any future dams will provide a great benefit to the American public. We strongly encourage the BLM to pursue the purchase of additional lands in the Lolo Creek canyon.

Hard Creek and Hazard Creek are also widely known as high quality whitewater runs; a fact left out of the Draft EIS. Hard Creek and Hazard Creek together comprise a short (roughly 1 mile) popular Class IV roadside run that most often is done in concert with the Little Salmon. Both Creeks also have Class V, seldom-tackled remote sections accessible only from roads far upstream. Upper Hard Creek is listed on our website as a 2 mile long class V run. Less is known about Upper Hazard Creek. We request that the recreational value of these resources be described in the final EIS.

A recent visit to a campsite at the confluence of Hard and Hazard creeks revealed scattered human waste, a group cathole, litter, nails in trees, hung poles with rope hanging from them, elk guts, and an elk head. This treatment of otherwise beautiful public natural resources should be managed and curtailed. Wild and Scenic designation would provide the BLM with some of the management resources needed to manage this area for all Americans.

American Whitewater fully supports the finding of Lolo, Hard, and Hazard creeks as suitable for Wild and Scenic designation. While we have little knowledge of Lake Creek, the information we do have suggests that it too is suitable for designation and we fully support that finding. In addition, while not part of the CFO RMP/EIS, we support inclusion of the Lower Salmon, Lolo Creek, Hard Creek, Hazard Creek, and Lake Creek in the Wild and Scenic system, and will be pursuing opportunities to have these streams designated by Congress.

### **Overlooked Unique Natural Areas:**

Within the CFO are the *Canyons of the Palouse*: numerous creeks that have cut massive canyons into the surrounding palouse prairie to join the Clearwater River system. These rivers and streams have a very early high flow period driven by snowmelt and rain, lasting from January through March. Outside of this timeframe, flows dwindle from hundreds or thousands of cubic feet per second to very low flows in the single or double digits. Because they drain prairie regions that have been intensely converted to agricultural lands, uplands intensely converted to timberlands, and valleys used for grazing or feedlots, and often from small towns with sewage treatment plants, these rivers and streams are in dire condition. Unlike most of Idaho's rivers, the intensive development and population centers are upstream of these small whitewater canyons rather than downstream.

The canyons cut through basalt and granite gorges and hide some of the last remnants of native palouse prairie, wildlife habitat, and pockets of mature ponderosa pine and cedar forests in a very disturbed region. These streams share geological, ecological, and hydrological characteristics with one another and no other regional streams.

They also share recreational characteristics. They are generally inaccessible except by whitewater kayak, contain both basalt and granite based rapids, support whitewater boating only in early spring when the rest of the region's water is locked up in snow, and are generally breathtakingly beautiful. The BLM owns land on many of these rivers, ranging from single small blocks of land, to extensive riparian tracts. While BLM may not be able to control the many impacts to these overlooked treasures, BLM is a landowner and thus a stakeholder in their management.

The primary Canyons of the Palouse with significant value as recreational boating resources on which BLM owns land are: Potlatch River, Big Bear Creek, Middle Potlatch River, Little Potlatch River, Lolo Creek, and Lawyer Creek.

We ask that the BLM consider providing the highest level of protection to their land parcels in these watersheds, and that you retain ownership of these parcels. These canyons are not well understood and are in variable condition. Anything that can be done to assure water quality standards are met, fisheries resources protected, public access provided, and forested steep slopes not cut, will be greatly appreciated and will greatly benefit the fish and wildlife that rely on these last vestiges of intact habitat in a very disturbed area.

### **Conservation and Restoration Watersheds**

We are heartened to see that the BLM has selected specific watersheds for conservation and restoration priority. In general, the streams you have selected are very deserving of conservation and restoration activities – however Alternative C provides protection for additional streams that we deem highly worthy. We ask that you select Alternative C with regards to Conservation and Restoration Watersheds, add at least Lawyer Creek and the Potlatch River to the list of Restoration Watersheds, and also that you consider the other Canyons of the Palouse mentioned above.

### **Riparian Management Areas**

We prefer additional riparian protection, above and beyond what is provided by the BLM preferred alternative. Specifically we would like to see the BLM select the riparian management prescriptions in Alternative C. Limiting riparian protections to 150 feet for non-fish bearing streams and small wetlands, and to 80 feet for intermittent streams does not adequately protect these headwater areas from overland flow of sediment, from reduced wood inputs from natural forces including wind-throw, and from aesthetic impacts to recreation.

Whitewater paddlers regularly enjoy intermittent streams. In fact, some of the Canyons of the Palouse could be called intermittent and perhaps even non-fish bearing even though at times each year they have many hundreds or even several thousand cfs of flow. Buffers of only 80 feet do little to protect the recreational experience of paddlers visiting these high quality whitewater streams. Similarly, these streams are large in size for portions of the year and are ecologically very different than small intermittent headwater streams. They need significant buffers to protect the already impacted water quality and limited wood inputs. We would argue that due to the unusual if not unique ecological and hydrological characteristics of many of the streams on the CFO lands, intermittent streams deserve the protection of more robust buffers.

Reduced buffer protection for non-fish bearing streams likewise ignores the benefits that wider buffers would have onsite for recreationists and downstream in fish bearing streams. There is more to stream life than fish – and many ecological and social values that buffers protect are not related to fish. For many reasons, protecting significant riparian buffers simply make sense. We request that the BLM consider increasing the riparian buffers along intermittent streams to at least 150 feet, and along non fish bearing streams to 300 feet. More preferable would be 300 foot buffers on all streams.

### **Fuel Treatments:**

Applying fuel treatments to 40% of the CFO over a 5 year period seems excessive and appears to exceed natural fire regime return intervals for many areas. We prefer Alternative C, in which 20% of the CFO will receive treatment. This will allow the focus of efforts to be on human interface areas and limited areas in which the natural or augmented fire regime has not provided fire in an unusually long period of time. Regardless we ask that no such treatments be implemented in roadless areas and that no new roads be constructed to facilitate these efforts. We suggest that the ecological, economic, and social impacts of new road construction outweigh any benefits of fuel treatments in remote areas.

### **Cross Country Vehicular Travel**

We agree with the limits set forth in the RMP for off road vehicles. Specifically, we agree that such vehicular use should be limited to designated routes and when appropriate (ie: roadless areas, Wilderness areas, riparian areas, and other sensitive areas) excluded entirely. These measures protect water quality, fish and wildlife habitat, and non-motorized backcountry recreational experiences.

### **Conclusion:**

Thank you for considering these comments. We support the many elements of the CFO RMP/EIS that seek to protect the rivers, lands, and recreational opportunities that are so important to our members. The CFO plays a stewardship role on some of the most spectacular whitewater rivers in the Nation. We are encouraged by your recognition of

several of these rivers as eligible for Wild and Scenic status, and by your commitment to protect riparian corridors and restore key watersheds. We ask that you recognize the value of some overlooked streams, that you consider expanding riparian buffers, and that you continue to support Wild and Scenic designation on the streams you have found eligible.

Sincerely,

Kevin Colburn  
National Stewardship Director