



**AMERICAN
WHITewater**

www.americanwhitewater.org

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Forest Plan Revision
Shoshone National Forest
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Dear Ms. Troxel,

American Whitewater is a national non-profit organization dedicated to the protection and restoration of whitewater rivers, as well as their safe enjoyment. Our members are primarily conservation-oriented kayakers, canoeists, and rafters, some of which recreate on the spectacular rivers and streams of the Shoshone National Forest. We are pleased to have the opportunity to review the Wild and Scenic River Eligibility Evaluation that is part of your Forest Plan revision process. As part of that review we have reached out to our members that have direct experience exploring the rivers and creeks of the Wind River Range and the Clarks Fork of the Yellowstone watershed. In general, we feel that the context and much of the content in your eligibility evaluation is accurate. However, the evaluation fails to recognize outstandingly remarkable whitewater paddling values on several rivers and streams that the paddling community treasures. Some of these streams are found eligible for other reasons in the evaluation and others were found ineligible for lack of ORV's. In these comments we will share descriptive information on these spectacular streams and propose that several rivers and streams be found eligible for their outstanding paddling opportunities they offer the public.

The rivers and creeks of the Wind River Range are among the most remote and challenging in the lower 48 states. They are typically characterized by arduous hikes to backcountry put-ins followed by long days of navigating challenging polished granite slides, waterfalls, and other high quality rapids. Their remote location and their logistical, physical, and technical challenges make them sought-after experiences by highly skilled exploratory paddlers from across the country. The kinds of paddling experiences offered in the Winds are a rarity in the United States, existing only in very few remote regions like the High Sierra, the Olympic Peninsula, and Central Idaho. With that said the paddling experiences provided by the Winds are unique to the Winds. Paddling is a nature-based and place-based activity, and the opportunity to paddle streams through the Winds offer a unique and powerful experience of the mountain range.

Similarly, the Clarks Fork of the Yellowstone watershed also offers some spectacular paddling for a wide range of paddling tastes. The Clarks Fork offers reasonable access, spectacular scenery, and a relatively long season of boatable flows.

It is worth noting that Yellowstone and Grand Teton National Parks are two of only three National Parks that prohibit the vast majority of paddling on rivers and streams. Thus, the American public is denied the ability to connect with the vast majority of the Greater Yellowstone Ecosystem in their kayaks and canoes. Paddling, like most human-powered Wilderness-compliant means of exploring the backcountry provides paddlers with a powerful and incomparable connection to a place. Because of the unusual current prohibition on paddling in nearby National Parks, the paddling opportunities near the Parks are all the more important. This management construct adds to the regional significance of the paddling ORV for many rivers and streams in the Greater Yellowstone Ecosystem that lie outside of the Park boundaries, but we feel that the rivers are also worthy of an eligibility finding regardless of adjacent management.

1. Additional Support for Rivers Found Eligible Based on a Paddling ORV

Several rivers determined to be eligible for Wild and Scenic River designation in the evaluation have regionally or nationally significant paddling values that were not formally recognized. We would like to highlight these streams and values and ask that the final evaluation include a “recreation ORV” that specifically recognizes the significant paddling opportunities provided by these rivers and streams. We are pleased to offer information on streams with well-known recreational paddling values, but would not claim that our list is a full inventory of such values.

a. Clarks Fork of the Yellowstone:

The Clarks Fork of the Yellowstone is a relatively popular and extremely high quality whitewater river. The sections being considered for eligibility are called the “Day Stretch” and the “Honeymoon Stretch.” These sections offer Class III-V+ whitewater boating opportunities late in the season when there are few other Class V paddling opportunities. These reaches are unique to the region and offer scenery unique to the area, and we recommend that the USFS recognize their recreational value.

Additional Information:

- <http://www.americanwhitewater.org/content/River/detail/id/2471/>
- <http://www.americanwhitewater.org/content/River/detail/id/3997/>
- See the guidebook: *Whitewater of the Southern Rockies*.

b. Middle Popo Agie River:

The Middle Fork of the Popo Agie offers paddlers a 1.7 mile hiking-access Falls Section and a 2.7 mile Sinks Section. Both sections offer excellent Class V whitewater with the Sinks section being far more commonly paddled. The Falls Section offers a challenging

adventure with many portages, while the Sinks Section offers a high quality maze of steep and technical whitewater. The Sinks of the Popo Agie are one of the most iconic whitewater runs of the Wind River Range, along with Bull Lake Creek. The paddling values of the Middle Fork of the Popo Agie are regionally unique and high quality

Additional Information:

- <http://www.americanwhitewater.org/content/River/detail/id/2484/>
- See the guidebook: *Whitewater of the Southern Rockies*.

c. South Fork Shoshone River:

The South Fork of the Shoshone River offers paddlers an extremely scenic paddling trip. Hiking upstream from the trailhead several miles grants paddlers access to a spectacular box canyon studded with moderate class II and III whitewater, and one class IV rapid. Below the trailhead the river offers easier whitewater and more open views. The opportunity to paddle a remote box canyon of low to moderate difficulty is a rare opportunity, as often this type of geology creates challenging rapids. The scenery and quality of this paddling experience justify recognition by the USFS.

Additional Information:

- <http://www.americanwhitewater.org/content/River/detail/id/2487/>
- See the guidebook: *Whitewater of the Southern Rockies*.

d. Warm Spring Creek:

Warm Springs is a classic whitewater run at least in part due to the experience of subterranean paddling. Paddlers are able to paddle through two caves, complete with stalactites, which is without a doubt a regionally and nationally unique opportunity. Other than the caves, this 8-mile run is consistently steep with good rapids ranging up to Class V. Scouting and portaging is generally an option at river level, and access is easy. Paddlers can view the historic flume during their descent. All told, Warm Springs Creek is a regionally and perhaps nationally significant recreational opportunity.

Additional Information:

- See the guidebook: *Whitewater of the Southern Rockies*.

e. Wiggins Fork:

The Wiggins fork of the Wind River is reported to be an incredibly scenic creek with one spot where the entire river disappears. Little is known about the paddling values of this creek at this time, except that it offers exceptional scenery.

f. Sunlight Creek:

The upper reaches of Sunlight Creek that were considered eligible appear to offer relatively easy paddling through a spectacular valley. We hope to learn more about the

paddling values of these reaches. Please see Section 2 for discussion of lower Sunlight Creek.

2. Support for Finding Additional Rivers Eligible Based on a Paddling ORV

Several rivers were considered by the Shoshone National Forest and found ineligible, or not formally considered at all, based on the perceived lack of Outstanding Remarkable Values. We would like to offer additional information to the Forest that support findings of eligibility based at least in part on their recreation ORV. We feel strongly that each of these streams have exceptional regional or nationally significant recreational values that justify their eligibility.

a. Bull Lake Creek:

Bull Lake Creek was considered for eligibility but denied based on the perceived lack of an ORV. We would like to correct this perception. Bull Lake Creek is among the very best whitewater runs of its kind in the entire country. Paddling Bull Lake Creek is one of the most physically arduous and technically challenging adventures in the United States. Paddlers must carry their boat and gear nearly 20 miles over two 11,000+ foot passes to reach the put-in. Once on the river paddlers negotiate countless rapids over 18 miles, many of which are named Class V+ drops, and carry their boats over numerous talus field portages *for three to four days*. The total trip most often takes five days. Perhaps the greatest testament to the quality of Bull Lake Creek as a paddling resource is that skilled paddlers undertake the challenging hike-in each year to paddle the river. Bull Lake Creek is often described with awe as a classic and incomparable whitewater adventure. There is no doubt that Bull Lake Creek offers an outstanding and remarkable recreational experience of national significance.

Additional Information:

- <http://www.americanwhitewater.org/content/River/detail/id/2488/>
- See the guidebook: *Whitewater of the Southern Rockies*.
- <http://www.coloradokayaking.com/main.php?pageid=Stories&storyid=11376738514890d41ff1b46>
- <http://egcreekin.blogspot.com/2008/07/bull-lake-creek.html>
- http://therangelife.blogspot.com/2007_09_01_archive.html
- <http://kayakskiandbike.blogspot.com/>

b. Crandall Creek:

An upper section of Crandall Creek was considered for eligibility but denied based on the perceived lack of an ORV. We ask that the Forest consider finding Crandall Creek from Highway 296 to the Clarks Fork of the Yellowstone River eligible based on its paddling values. This section of Crandall Creek offers paddlers high quality Class IV whitewater paddling in a beautiful setting similar to the much more difficult Clarks Fork of the

Yellowstone. The river is highly scenic, boasts memorable and unique rapids, and unlike most other nearby creeks it is easily accessible.

Additional Information:

- <http://www.americanwhitewater.org/content/River/detail/id/2481/>
- See the guidebook: *Whitewater of the Southern Rockies*.

c. Sunlight Creek (Lower)

Lower Sunlight Creek offers a high quality and extremely scenic 6-mile paddling trip ending at the Highway 296 bridge and beginning at the next bridge upstream. The riverbed is predominantly boulder gardens ranging from class III+ at low water to Class V- at high water, flowing through an impressive forested canyon. This is a fairly well known run of moderate difficulty with easy access, and is spoken highly of by the paddling community. It provides a regionally exceptional paddling opportunity.

Additional Information:

- See the guidebook: *Whitewater of the Southern Rockies*.

d. North Fork Popo Agie River:

Below the Dickinson Park access a three mile trail leads to the North Fork Popo Agie. From there the river drops a spectacular 2,222 ft. in 8 miles through a series of rapids, falls, canyons and cascades. There are many great drops to run, however, there are also many arduous portages and the river often fans out into wide flat sections. This remote run is best done in two days, making it a rare overnight class V paddling adventure. Such multi-day challenging adventures are rare, and nationally significant.

Additional Information:

- See the guidebook: *Whitewater of the Southern Rockies*.

e. Grinnell Creek:

Grinnell Creek is a tributary of the North Fork Shoshone that offers paddlers willing to hike a 2.5 mile class IV+ run. The run is primarily a boulder garden type riverbed, with impressive scenery.

Additional Information:

- See the guidebook: *Whitewater of the Southern Rockies*.

f. New Fork River:

The upper New Fork is an amazing Class V steep creek flowing from the high mountain wilderness of the Wind River Range through a granite canyon. Beginning at New Fork Lakes boat ramp, a paddle across the lake and a 7 mile hike lead to the put in at New Fork Park. The run features numerous Class V+ rapids, a 12 foot waterfall, and a couple

miles of fun read-and-run whitewater. When the whitewater ends, a mile of flatwater leads paddlers back to the lake. Paddlers report that the New Fork provides a regionally significant paddling opportunity.

Additional Information:

- See the guidebook: *Whitewater of the Southern Rockies*.

Conclusions:

We would like to thank the Shoshone National Forest for updating their eligible rivers inventory as part of your Forest Planning effort. We hope that our feedback can help strengthen your evaluation. Specifically we ask that you recognize paddling as a recognized Outstanding Remarkable Value for the rivers we described in Section 1 of these comments. In addition, and perhaps more importantly, we ask that you find the rivers we listed in Section 2 of these comments to be eligible for Wild and Scenic designation based in part on their Outstanding Remarkable Value of paddling. Thank you for considering these comments,

Respectfully Submitted By:

A handwritten signature in blue ink, appearing to read 'K. R. Colburn', with a stylized, flowing script.

Kevin R. Colburn
National Stewardship Director
American Whitewater