

**American Rivers • American Whitewater • Washington Wilderness Coalition •
The Wilderness Society • Alpine Lakes Protection Society • National Wildlife Federation**

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Ms. Margaret Hartzell
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Dear Ms. Hartzell:

Thank you for the opportunity to comment on the Okanogan-Wenatchee and Colville Forest Plan Revision Proposed Action. The following comments are focused on the Wild and Scenic River actions that begin on page 74 of the Okanogan-Wenatchee Proposed Action and page 66 in the Colville National Forest Proposed Action.

GENERAL COMMENTS

We strongly support the Wild and Scenic eligibility determinations in the 1989 Okanogan National Forest Plan and 1990 Wenatchee National Forest Plan, and we applaud the Forest Service for acknowledging that changed circumstances since the adoption of these plans justify the inclusion of new river segments as eligible for designation under the Wild and Scenic Rivers Act (WSRA). Over the last twenty years, a number of species have been listed for protection under the Endangered Species Act (ESA), including steelhead, bull trout, and the northern spotted owl. As a result, Washington State, tribes, and the federal government are firmly invested in meeting legal obligations to protect and restore critical habitat for the recovery of these species. In addition to ESA listings, changes in land ownership, increases in recreational use, advances in the science and understanding of river ecosystems, and water resource management activities all reinforce the need to review the eligibility of these and other rivers in the National Forests.

While the Okanogan-Wenatchee Proposed Action is a significant step in the right direction, we believe additional rivers should be found eligible for designation and that the same review should be conducted in the Colville National Forest Plan. Sullivan Creek is one example of a river on the Colville National Forest that should be further analyzed due to its outstandingly remarkable recreation, fisheries, and other values.

Our comments provide additional information on the outstandingly remarkable values of specific reaches in the Teanaway basin, including the tributaries of Bear Creek, Stafford Creek, Jack Creek, and Jungle Creek. We also believe that the Forest Service Handbook guidelines were not properly applied in the case of the mainstem of the Tieton River and the Bumping River, which were excluded from further review based on the fact that the river was determined not to be free flowing. While both rivers are regulated by a dam, they are in fact "free-flowing" in the segments

from the dam to the National Forest boundary as defined by the Wild and Scenic Rivers Act. Because the rivers are free-flowing, we urge the Forest Service to conduct further eligibility evaluations that are likely to reveal that they are eligible for Wild and Scenic designation.

Based on the current science, other rivers in the National Forests may also possess outstandingly remarkable values and, therefore, are eligible for Wild and Scenic designation. We support the addition of any rivers that possess outstandingly remarkable values that deserve Wild and Scenic protection. For purposes of our comments, however, we have compiled information from recovery plans and other credible sources to unequivocally demonstrate the existence of outstandingly remarkable values for specific segments of the Teanaway, Tieton, and Bumping rivers. We also provide a summary of the values provided by Sullivan Creek. At a minimum, we urge the Forest Service to add these river segments to the list of eligible rivers in the final Okanogan-Wenatchee and Colville National Forest Plan.

TEANAWAY RIVER

According to the Forest Service Handbook (Handbook), “For a river to be eligible for designation to the National System, the river, with its adjacent land area, must have one or more outstandingly remarkable values.”¹ The Teanaway River and the adjacent land area possess at least four outstandingly remarkable values, including fisheries, wildlife, cultural/historic, and scenery. To organize the information, we have listed the eligibility criteria in the Handbook and provided supporting information to satisfy each of the eligibility requirements in order to demonstrate the values in the Teanaway basin.

FISHERIES

According to the Handbook, fish values are considered “outstandingly remarkable” when the following criteria are satisfied:

4. Fish. Fish values may be judged on the relative merits of either fish populations or habitat, or a combination of these river-related conditions.

a. Populations. The river is nationally or regionally an important producer of resident and/or anadromous fish species. *Of particular significance is the presence of wild stocks and/or federal or state listed or candidate threatened, endangered, or sensitive species.* Diversity of species is an important consideration and could, in itself, lead to a determination of outstandingly remarkable.

b. Habitat. The river provides exceptionally high quality habitat for fish species indigenous to the region of comparison. *Of particular significance is habitat for wild stocks and/or federal or state listed or candidate threatened, endangered, or*

¹ FSH 1909.12 – *Land Management Planning Handbook*; Chapter 80 (Wild and Scenic River Evaluation), Section 82.14 (Outstandingly Remarkable Values), 2006

*sensitive species. Diversity of habitats is an important consideration and could, in itself, lead to a determination of outstandingly remarkable.*²

Based on these criteria, the Teanaway offers outstandingly remarkable fish values due to the presence of a regionally significant population of steelhead, bull trout (both are ESA listed species), and depressed stocks of spring Chinook salmon. The Teanaway also possesses exceptionally high quality habitat that is complex, diverse, and capable of supporting steelhead, bull trout, and spring Chinook salmon.

Fish Populations

STEELHEAD

Yakima River steelhead is an anadromous fish species that was originally listed as threatened in March of 1999, and their status under the ESA has not changed in subsequent evaluations. The Yakima Basin is home to at least four different populations of steelhead, and all four populations are managed as part of the Middle Columbia River Distinct Population Segment.³ One of these populations, the Upper Yakima, refers to steelhead that spawn upstream from the confluence of the Naches and Yakima rivers. Historically, Upper Yakima steelhead were the largest stock in the Yakima basin and possibly the entire Columbia River system. However, the fish populations have declined significantly since dams and other alterations to the river system have impeded fish passage and destroyed habitat.

In 2009, the U.S. Bureau of Reclamation (Bureau) released a technical paper with data on the migration and spawning patterns of Upper Yakima steelhead from 2002-2006. Based on the report, the Teanaway is the most heavily used spawning tributary for Upper Yakima steelhead. In fact, between 32% and 47% of all wild steelhead in the Upper Yakima traveled to the Teanaway to spawn within the four year period of the study. Most of the steelhead in the Teanaway basin spawned in the North Fork and mainstem of the Teanaway, but steelhead were also observed on the Middle Fork and West Fork and, occasionally, fish would travel from one fork to another before spawning.⁴

The Upper Yakima steelhead are a regionally significant wild fish population, and the stock's heavy reliance on the Teanaway make the rivers in the basin an outstandingly remarkable fishery for purposes of Wild and Scenic eligibility. We urge the Forest Service to reevaluate its decision in the Proposed Action and determine that the mainstem as well as the North, Middle, and West Forks of the Teanaway are eligible for Wild and Scenic protection.

SPRING CHINOOK

Spring Chinook salmon is another species found in the Teanaway basin, particularly in the North Fork, which is a key tributary for increasing populations of spring Chinook in the Yakima Basin.

² FSH 1909.12 – *Land Management Planning Handbook*; Chapter 80 (Wild and Scenic River Evaluation), Section 82.14a (Eligibility Criteria), 2006 (*emphasis added*)

³ <http://www.usbr.gov/pmts/fish/Reports/steelfinalFinal%20-%206-10-09r.pdf>

⁴ <http://www.usbr.gov/pmts/fish/Reports/steelfinalFinal%20-%206-10-09r.pdf>

The spring Chinook run in the Mid-Columbia evolutionarily significant unit (ESU) is the only population of spring Chinook that is not listed as threatened under the ESA in the Columbia basin.⁵ However, the Washington Department of Fish and Wildlife (WDFW) includes Yakima spring Chinook salmon on the list of depressed stocks in the Salmonid Stock Inventory (SaSI).⁶ As a result, state and tribal governments as well as other partners are working together to increase the number of Chinook salmon in the basin, and the high quality of habitat in the Teanaway basin make it a priority area for protecting natural origin salmon.

Since 2000, the Yakima-Klickitat Fishery Project (YKFP) has been experimenting with supplemental hatchery Chinook releases in Jack Creek, a tributary of the North Fork of the Teanaway. The program is designed to revitalize salmon populations of natural origin in underutilized but high quality habitat areas. Of all the Upper Yakima release sites, the North Fork Teanaway is the most promising site for bolstering the spring Chinook population as the redd counts increased dramatically after supplementation.⁷ In 2010, there were 253 Chinook redds counted in the Teanaway where 12 years prior there were none.⁸

Given the presence of spring Chinook in the North Fork of the Teanaway and the fact that the stock is recognized as “depressed” by the WDFW, we believe the North Fork of the Teanaway should be found eligible for Wild and Scenic protection due to the river’s outstandingly remarkable fisheries values that need to be protected and enhanced.

BULL TROUT

Historically, bull trout have relied on the diverse and high quality habitat in the Teanaway basin. While Teanaway bull trout populations have drastically declined and are listed under the ESA, there is a recognized population of bull trout in the Teanaway. According to U.S. Fish and Wildlife Service (USFWS), “Teanaway River from its confluence with the Yakima River upstream to its confluence with the Middle Fork and West Fork *is occupied* and provides FMO and connectivity for the Yakima Core Area.”⁹ According to the report, bull trout also occupy the North Fork of the Teanaway to a barrier falls about 18 miles upstream, and bull trout either occupy or are presumed to occupy Teanaway River tributaries, including Stafford Creek, Jack Creek, and Jungle Creek.¹⁰

The presence of listed steelhead and bull trout as well as depressed spring Chinook salmon all show that the Teanaway has regionally important and outstandingly remarkable values for fisheries. Again, we urge the Forest Service to reevaluate the Teanaway and find the three forks as eligible for Wild and Scenic designation.

Fish Habitat

⁵ <http://www.nwr.noaa.gov/ESA-Salmon-Listings/Salmon-Populations/Maps/Chinook-ESU-Maps.cfm>

⁶ <http://wdfw.wa.gov/conservation/fisheries/sasi/search.php?searchby=WRIA&search=39&orderby=Species>

⁷ *Spatial patterns of Yakima River Spring Chinook spawning before and after supplementation.* May, et al. 2008.

⁸ *Using Hatchery-Origin Fish to Rebuild Salmon Populations: Empirical Results from Tribal Restoration Programs in the Columbia River Basin.* Bosch, William J. 2011.

⁹ <http://www.fws.gov/pacific/bulltrout/pdf/Justification%20Docs/BTChapter11.pdf> (*emphasis added*)

¹⁰ <http://www.fws.gov/pacific/bulltrout/pdf/Justification%20Docs/BTChapter11.pdf>

According to the Handbook criteria, an outstandingly remarkable fishery value exists where a river system provides “exceptionally high quality habitat for fish species indigenous to the region of comparison.” The Handbook also highlights the importance of diverse habitats that support wild or listed fish stocks. The rivers in the Teanaway basin originate in the Alpine Lakes Wilderness, and the river system possesses diverse, high quality habitat that supports ESA listed steelhead and bull trout as well as depressed spring Chinook salmon.

The quality of habitat in the Teanaway is well-documented. The 2009 Yakima Steelhead Recovery Plan found that most of rivers in the basin (the mainstem and its three forks) provided high quality spawning habitat.¹¹ Moreover, specific reaches of the Teanaway and tributaries, including Bear Creek, Jack Creek, and Jungle Creek were designated as critical habitat areas for listed steelhead.¹²

The Teanaway basin also provides high-quality habitat for listed bull trout. Despite the decline of indigenous bull trout populations, the three forks of river and the tributaries of Jack Creek, Jungle Creek, and Stafford Creek are designated as critical bull trout habitat.¹³ According to the USFWS, bull trout need:

- Colder water temperature than most salmonids;
- The cleanest stream substrates for spawning and rearing;
- Complex habitats, including streams with riffles and deep pools, undercut banks and lots of large logs; and
- River, lake and ocean habitats that connect to headwater streams for annual spawning and feeding migrations.¹⁴

The designation of specific reaches of the Teanaway as a critical habitat area for bull trout supports the assertion that the basin provides exceptionally high quality and diverse habitat for listed bull trout. In addition to the USFWS, the Department of Ecology has recognized the exceptional habitat in the basin: “The Teanaway River system represents some of the highest quality streams and cold-water fish spawning and rearing areas in the Yakima River Basin.”¹⁵

We strongly believe that both the fish populations present in the Teanaway basin as well as the exceptionally high quality habitat in the basin satisfy the Forest Service’s criteria for an outstandingly remarkable value for fisheries. Therefore, we urge the Forest Service to find the North, Middle, and West Forks of the Teanaway eligible for Wild and Scenic designation in the final Okanogan- Wenatchee Forest Plan.

WILDLIFE

¹¹ <http://www.nwr.noaa.gov/Salmon-Recovery-Planning/Recovery-Domains/Interior-Columbia/Mid-Columbia/upload/Mid-C-Yakima.pdf>

¹² <http://www.nwr.noaa.gov/Publications/FR-Notices/2005/upload/70FR52630.pdf>

¹³

http://www.fws.gov/pacific/bulltrout/finalcrithab/washington/Unit_11_Yakima_River_Map_03_of_03_Upper_Mainstem.pdf

¹⁴ <http://www.fws.gov/pacific/bulltrout/>

¹⁵ <http://www.ecy.wa.gov/programs/wq/tmdl/TeanawayTMDL.html>

The following excerpt from the Handbook guides our comments on wildlife values that exist in the Teanaway:

5. **Wildlife.** Wildlife values may be judged on the relative merits of either terrestrial or aquatic wildlife populations or habitat, or a combination of these conditions.
 - a. **Populations.** The river, or area within the river corridor, contains nationally or regionally important populations of indigenous wildlife species. Of particular significance are species considered to be unique, and/or populations of federal or state listed or candidate threatened, endangered, or sensitive species. Diversity of species is an important consideration and could, in itself, lead to a determination of outstandingly remarkable.
 - b. **Habitat.** The river, or area within the river corridor, provides exceptionally high quality habitat for wildlife of national or regional significance, and/or may provide unique habitat or a critical link in habitat conditions for federal or state listed or candidate threatened, endangered, or sensitive species. Contiguous habitat conditions are such that the biological needs of the species are met. Diversity of habitat is an important consideration and could, in itself, lead to a determination of outstandingly remarkable.

Based on these criteria and the conditions on the ground, the Teanaway watershed, specifically the Teanaway River corridor, offers outstandingly remarkable wildlife values. To support this conclusion, we offer the information below.

Wildlife Populations

The Teanaway River corridor is home to species of local and national significance from spotted owls to elk to cougars to wolves, and the river corridor provides an important travel pathway for these species making wildlife a river-dependent value. The diversity of species that reside in the Teanaway watershed and utilize the river corridor is remarkable. Remote cameras and biologists have documented Cascade red fox at high elevations, wild turkeys, deer, elk, cougars, pine marten, black bear, coyote, bobcat, and a moose.

Although there are many species in the region that are significant and in need of protection, two species with identified populations in the Teanaway, gray wolves (*Canis lupus*) and northern spotted owl (*Strix occidentalis caurina*), are especially important due to their listing under the ESA.

In July 2011, the Washington Department of Fish and Wildlife (WDFW) confirmed the presence of a wolf pack in the Teanaway watershed appropriately called the Teanaway Pack.¹⁶ While information on the pack's use of habitat and travel patterns in the basin, including within the river corridor, is relatively sparse due to the recent discovery of the pack, new GPS collar information and remote camera data are increasing our understanding of the pack's use of the

¹⁶ http://wdfw.wa.gov/conservation/gray_wolf/packs/teanaway/

Teaway area. As the Forest Planning process moves forward, we would like to work with Forest Service staff to ensure the most up-to-date information is considered in an eligibility review in the Teaway basin.

The river corridors also include critical habitat identified for the northern spotted owl that is important not only for nesting, roosting, and foraging but also dispersal. We have attached a map from the Washington Department of Natural Resources (DNR) that shows owl circles in the Teaway basin and important habitat areas, which include key river corridors within the basin.

Wildlife Habitat

In addition to providing direct habitat for the species listed above, the Teaway River corridor provides valuable habitat connectivity in the Cascades and is within the North Cascades Grizzly Bear Recovery Zone.¹⁷ In 1975, the U.S. Fish and Wildlife Service listed the grizzly bear as a threatened species in the lower 48 states. The *North Cascades Ecosystem Recovery Plan* for the Grizzly Bear (Grizzly Recovery Plan) was finalized in 1997, and was developed in cooperation with the State of Washington Dept. of Fish & Wildlife, U.S. Fish & Wildlife Service, U.S. Forest Service, and the National Park Service. In the Grizzly Recovery Plan, the Teaway River corridors on all three forks of the river fall within the North Cascades ecosystem for recovery because of the river's high quality riparian habitat and connectivity importance.

Habitat connectivity that the riparian corridor along the river provides is crucial to allow for species to move between important core habitats for food, mates, establishment of new homes, and successfully adjust to changing conditions. The basin has also been identified as critical to facilitate wildlife's adaptation to predicted changes in our climate. The Teaway River corridor including its forks provide key connectivity for a wide variety of wildlife. In the Forest Service's ongoing terrestrial species analysis, which will inform the Forest Plan revision, the Teaway River was identified for action including "Restoration to enhance source habitat amount and connectivity is a high priority. Protection of existing source habitat is also a priority." This same draft analysis also identified the North Fork of the Teaway River as a "Priority watershed for reducing the impacts of human access on habitats for focal wildlife species." At the time these comments were drafted, we were awaiting final publication of this analysis, but these findings complement those conducted at a coarser scale showing the importance of this area for maintaining connectivity in the Cascades.

The diverse wildlife populations that are present in the basin, particularly in the upper reaches of the river system, as well as the important habitat in the Teaway satisfy the criteria, and we urge the Forest Service to find that the Teaway possesses outstandingly remarkable values for wildlife and are eligible for Wild and Scenic designation.

CULTURAL/HISTORIC

The following criteria are found in the Handbook and provide the key elements for determining

¹⁷ <http://bearinfo.org/wp-content/uploads/2009/08/NCE-locator-2010.jpeg>

whether an area supports an outstandingly remarkable cultural or historic value:

6. Historic and Cultural. The river, or area within the river corridor, contains important evidence of occupation or use by humans. Sites may have national or regional importance for interpreting history or prehistory.
 - a. History. Site(s) or feature(s) associated with a significant event, an important person, or a cultural activity of the past that was rare or one-of-a-kind in the region. A historic site or feature, in most cases, is 50 years old or older.
 - b. Pre-history. Sites may have unique or rare characteristics or exceptional human interest value; represent an area where a culture or cultural period was first identified and described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare sacred purposes.

The Teanaway River is located in the Plateau cultural region, which is within the drainage basin of the Columbia River. There are over four dozen archaeological resources documented with the Department of Archaeology and Historic Preservation (DAHP) in the Teanaway basin. The archaeological resources range from single American Indian artifacts to large concentrations of stone tool manufacturing waste material that indicate repeated seasonal encampments. Historic resources range from single historic artifacts including railroad spikes and bottles to logging camps, homesteads, railroad grades and the town site of Casland.

The Teanaway River is located in the traditional territory of the Yakama and Kittitas Tribes, two closely related but independent groups prior to the treaty of 1855. The Treaty made them both part of the Confederated Tribes and Bands of the Yakama Nation.¹⁸ The Yakamas and Kittitas Tribes concurrently used the Teanaway Basin for resource procurement for thousands of years. They had a common language and culture but were autonomous.

Ethnographic records document two villages sites near the confluence of the Teanaway and Yakima rivers: *tiánawĩns* and *tátxanĩxsha*. *Tiánawĩns* was north of the Yakima on the Teanaway River. It was a permanent village with about fifty permanent residents. Abundant game in the vicinity attracted visitors every fall. *Tátxanĩxsha* was on the south side of the Yakima River with a population of 50-60.¹⁹

We recommend that you consult the Yakama Nation for more detailed information on the cultural or historic values in the Teanaway and other parts of the Yakima basin. However, the conservation community believes that the archeological record shows an outstandingly remarkable cultural/historic value, which should make specific reaches of the Teanaway eligible for Wild and Scenic designation.

SCENERY

The upper Teanaway supports outstanding views of the Cascades as well as diverse vegetation

¹⁸ Schuster, Helen H., *Yakima and Neighboring Groups*, pp. 327-351 (1998). *Handbook of North American Indians, Volume 12*, W. G. Sturtevant, general editor. Smithsonian Institution, Washington D. C.

¹⁹ Ray, Verne, *Native Villages and Groupings of the Columbia Basin* Pacific Northwest Quarterly, Vol. 27. pp. 99-152 (1936).

types. As a result, the area is prized by hikers, backpackers, and campers. The following criteria are required for an outstandingly remarkable value for scenery:

1. Scenery. The landscape elements of landform, vegetation, water, color, and related factors result in notable or exemplary visual features and/or attractions. When analyzing scenic values, additional factors such as seasonal variations in vegetation, scale of cultural modifications, and the length of time negative intrusions are viewed, may be considered. Scenery and visual attractions may be highly diverse over the majority of the river or river segment.

One of the most outstanding areas in the river basin is where the upper North Fork Teanaway River originates in Esmeralda Basin. In the springtime, the crystal clear headwaters of the North Fork splash into a riot of brightly colored wildflowers (some say the best color display in the Teanaway occurs here). In the fall, the wildflowers have long since withered and the grasses along the North Fork's bank have turned into shades of bright yellow and brown. Wildflowers in this part of the basin include Castilleja, Elephant's Head, Columbia Lewisia, Jeffrey's Shooting Stars, yellow violets, glacier lilies, Western Pasque, Phlox, Spring Beauties, Lupine, Scarlet Gilia, purple asters, and Columbine.

Esmeralda Peak towers over the North Fork Teanaway and gives a rugged look to the area, which would otherwise be seen as fairly benign terrain along the headwaters. Tall pine and fir trees line the river banks, providing ample shade. The tumbling rapids and pristine water of the North Fork provides hikers and backpackers with a beautiful spot to rest and enjoy the view.

With the incredible river-dependent scenic values on the North Fork of the Teanaway, we urge the Forest Service to find the river is eligible for Wild and Scenic designation in the final Forest Plan.

TIETON RIVER

In the Northeastern Washington Forest Plan Revision Wild and Scenic River Eligibility Analysis dated April, 2011, and prepared by the Forest Service to inform the Proposed Action, Table 2 identifies the Tieton below Rimrock Dam as not free flowing. Citing guidance provided in the Forest Service Handbook at 1909.12 Chapter 80 (January 31, 2006), the analysis report states that, “[if a river] is not free-flowing, no further analysis is needed.” We believe this finding is inconsistent with the Forest Service Handbook, joint USDA-USDI guidelines, guidance provided by the Interagency Wild and Scenic Rivers Coordinating Council, and the intent of Congress.

Specifically, the Wild and Scenic Rivers Act defines free-flowing “as applied to any river or section of a river, means existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway.”²⁰ The Forest Service Handbook (FSH 1909.12-82.12) references USDA-USDI Guidelines stating that, “The fact that a river segment may flow between large impoundments will not necessarily preclude its

²⁰ 16 USC § 1286(b)

designation. Such segments may qualify if conditions within the segment meet the criteria.”²¹ The Interagency Wild and Scenic Rivers Coordinating Council provides further clarification in *A Compendium of Questions & Answers Relating to Wild & Scenic Rivers*, stating that “Congress did not intend all rivers to be ‘naturally flowing,’ i.e., flowing without any manmade up or downstream manipulation. The presence of impoundments above and/or below the segment (including those which may regulate flow regimes within the segment).”²² In response to the direct question, “Can a river be considered free-flowing when the flow is dependent on releases from a dam?” the Council responds, “Yes. Congress and the Secretary of the Interior have designated many river segments which are above or below dams.”²³

Indeed, a number of Congressionally designated rivers throughout the region have flow regimes modified by dams and are not “naturally flowing” but are in fact “free-flowing” within the designated segment. These rivers include the Skagit, Deschutes, Crooked, Klamath, Rogue, Snake, and others. Although the Tieton is not a “naturally flowing” river below Rimrock Dam, we believe the downstream reach does meet the free-flowing criteria and should be further evaluated for eligibility as a Wild and Scenic River.

Looking beyond the issue of the Tieton’s free-flowing character, we also believe the river supports outstandingly remarkable values for recreation and fisheries and information on these values is described below.

RECREATION

The incredible recreational opportunities available on the Tieton River are unique and rare within the region. The Tieton is the only river on the Okanogan-Wenatchee National Forest to support significant commercial use and as such it is an important educational resource for introducing the public to rivers. With flows that support kayaking and rafting in the early fall, the river is popular enough to attract visitors from throughout the region. Boating clubs from Spokane, Portland, and Seattle have annual gatherings on the river every fall. The river is also a fall training run for members of the U.S. Whitewater Team living in the region. Given the unique and remarkable recreation values on the Tieton, the river is eligible for Wild and Scenic designation.

FISHERIES

Fish Populations

While the data on fish populations present in the Tieton River below Rimrock Dam is less extensive than for the forks and tributaries in the upper Tieton, bull trout have been observed and recorded in the lower Tieton.²⁴ As stated in the analysis of the Teanaway, bull trout are an ESA listed fish species, which increases the importance of Wild and Scenic eligibility.

²¹ 47 FR 39454-39461, September 7, 1982

²² Marsh, G. 2006. *A Compendium of Questions & Answers Relating to Wild & Scenic Rivers*. Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council.

²³ Marsh, G. 2006. *A Compendium of Questions & Answers Relating to Wild & Scenic Rivers*. Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council.

²⁴ http://www.fws.gov/pacific/bulltrout/RP/Chapter_21%20Middle%20Columbia.pdf

Fish Habitat

The mainstem Tieton River has an altered flow regime due to Rimrock Dam and activities like logging and grazing threaten the quality of the riparian habitat. However, the river provides high quality habitat for fish species, including ESA listed bull trout. Both the upstream forks of the river and the mainstem reach downstream from Rimrock Dam are designated as a critical habitat area for bull trout.²⁵ The Mid-Columbia Steelhead Recovery Plan also designated the Tieton as a critical habitat area for the recovery of ESA listed steelhead.²⁶ The downstream reach is a priority for restoration for recovering bull trout and steelhead as well as improving habitat for spring Chinook salmon.²⁷

With the presence of ESA listed fish in the Tieton and the importance of habitat the river provides for recovery of listed fish species, we believe the mainstem Tieton below Rimrock Dam is eligible for Wild and Scenic protection.

BUMPING RIVER

The Proposed Action found that the Bumping River downstream of the dam was ineligible for Wild and Scenic designation because the river was not free flowing. As we explained in our comments for the Tieton River, the presence of a dam does not in and of itself preclude a river from being eligible for designation. While the flows in the Bumping River are altered by the impoundment, the river is in fact free flowing. Moreover, the quality of habitat and presence of listed fish species supports that, at a minimum, the river, including the reach upstream from the reservoir and the reach downstream of Bumping Dam, possesses an outstandingly remarkable value for fisheries.

Fish Populations

The Bumping River provides important habitat for spring Chinook and steelhead up to Bumping Lake. As in other parts of the basin, the spring Chinook salmon that reside below the dam are recognized as a depressed stock.²⁸ Summer steelhead are present in the river and are listed under the ESA.²⁹ From the source to the confluence, the river also hosts a genetically-significant run of bull trout, and the river is the only tributary in the Naches basin with a “healthy” stock of bull trout.³⁰

Fish Habitat

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http://www.fws.gov/pacific/bulltrout/finalcrithab/washington/Unit_11_Yakima_River_Map_02_of_03_Middle_Mainstem.pdf

²⁶ <http://www.nwr.noaa.gov/Publications/FR-Notices/2005/upload/70FR52630.pdf>

²⁷ http://www.fws.gov/pacific/bulltrout/RP/Chapter_21%20Middle%20Columbia.pdf

²⁸ <http://www.ecy.wa.gov/services/gis/maps/wria/sasi/wria38/chsp38.pdf>

²⁹ <http://www.ecy.wa.gov/services/gis/maps/wria/sasi/wria38/stsu38.pdf>

³⁰ <http://www.ecy.wa.gov/services/gis/maps/wria/sasi/wria38/dbt38.pdf>

Like the Tieton, the Bumping River's flows and water quality are affected by an upstream impoundment. Despite these alterations, the river provides important habitat for steelhead and bull trout. In fact, the entire river is designated as critical habitat for bull trout and the reach downstream from the dam is designated as "critical habitat" for steelhead.³¹

Since the Bumping River provides important habitat for the recovery of two ESA listed fish species, we believe it should be found eligible for Wild and Scenic designation. We urge the Forest Service to reassess the eligibility of Bumping River for Wild and Scenic designation, and we are happy to work with the agency to provide any additional information on the importance of the river for native fish species.

SULLIVAN CREEK

Sullivan Creek flows through a scenic river canyon in the Colville National Forest. The recent settlement agreement to remove an old hydropower dam on this river will further enhance the regionally and nationally significant values as outlined below. As with any of the rivers in our comments, we are happy to provide additional information and sources to aid in the review of Sullivan Creek's eligibility.

RECREATION

Sullivan Creek offers paddlers an opportunity to float meandering Class II upper reaches, and a spectacular and remote Class V lower Canyon.³² It offers one of the few creek boating opportunities on the Colville National Forest and is known to attract paddlers from throughout the region.

SCENERY

Sullivan Creek offers views of a clear blue stream tumbling over falls and rapids in its lower slate canyons, and as it meanders through moist forest in its upper reaches.

FISHERIES

Abundant clear and cold water support bull trout and other native fish like west slope cutthroat trout. Sullivan Creek is listed as critical habitat for Bull Trout and provides the best salmonid spawning and rearing habitat of any tributary of the Boundary reservoir. This habitat makes Sullivan Creek very important for bull trout and other native species.

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http://www.fws.gov/pacific/bulltrout/finalcrithab/washington/Unit_11_Yakima_River_Map_03_of_03_Upper_Main_stem.pdf (Bull Trout); <http://map.streamnet.org/website/CriticalHabitat/viewer.htm> (Steelhead)

³² American Whitewater River Database pages:

<http://www.americanwhitewater.org/content/River/detail/id/3508/>

<http://www.americanwhitewater.org/content/River/detail/id/3507/>

WILDLIFE

Sullivan Creek is home to numerous nationally and regionally rare wildlife species including lynx.

HISTORY

Sullivan Creek has a long and rich history of human development, including the construction of the soon-to-be-removed Millpond Dam.

CONCLUSION

Thank you for the opportunity to comment on the Proposed Action for the Forest Plan Revision. We understand how much work went into the Proposed Action, and believe that the Forest Service has done a commendable job on the Wild and Scenic portions of the plan. However, we urge the Forest Service to find the Teanaway (including important tributaries like Bear, Stafford, Jungle, and Jack creeks), Tieton, and Bumping rivers are eligible for Wild and Scenic protections based on the outstandingly remarkable values the rivers provide to the region.

Please contact Darcy Nonemacher at dnonemacher@americanrivers.org if you have any questions about these comments or want additional information on any of the rivers discussed in this letter.

Sincerely,

Darcy Nonemacher
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