

TO: Karen Mollander, Margaret Hartzell, Linda Fee/U.S. Forest Service

FROM: Bonnie Rice, American Rivers
Jon Soest, North Central Washington Audubon Society
Charlie Raines, Sierra Club
Thomas O'Keefe, American Whitewater
Tom Uniak, Washington Wilderness Coalition
Jen Watkins, Conservation Northwest

RE: Wild and Scenic Rivers on the Wenatchee National Forest

DATE: December 11, 2006

Karen, Margaret, Linda:

Thank you again for meeting with us¹ last month to discuss Wild and Scenic Rivers on the Wenatchee and Okanogan National Forests in the context of the current Wenatchee/Okanogan Forest Plan revision process. We appreciated the opportunity to talk with you about how the Forest Service is handling this topic in the planning process and present our perspective on changed conditions on the Forest that impact Wild and Scenic River eligibility determinations and recommendations.

As we discussed in October, we strongly believe that there are two reasons why the Forest Service should reconsider rivers for Wild and Scenic eligibility in the Forest Plan revision process. These are: 1) Conditions on the ground have changed significantly since the 1990 plan was released; and 2) Omissions/errors in the 1990 plan. Changes on the ground include, but are not limited to:

- Changes in land ownership (private to public and vice versa, conservation easements, land trust holdings)
- Endangered Species Act (ESA) listings (including spring chinook, steelhead, bull trout, northern spotted owl) and required protection
- Large increases in recreational use (particularly whitewater kayaking and rafting) and the corresponding increase in local businesses serving these users
- Creation of watershed plans and implementation (state law, created with the input of USFS staff)²

¹ Thomas O'Keefe, Tom Uniak, and Jen Watkins are members of the environmental community's task force on the forest planning process and/or have excellent on-the-ground knowledge of rivers. They were unable to attend the meeting on October 13, but they provided valuable input to this letter and will continue to engage in the planning process on the issue of Wild and Scenic Rivers.

² Many watershed plans were created through collaboration and thousands of hours of hard work over several years among diverse constituencies. This work was tied carefully to other planning efforts including salmon recovery plans, subbasin plans (both developed in cooperation with the USFS), Growth Management Plans and Critical Area Ordinances, and Shoreline Management Plans. The watershed plans and ongoing implementation work are important considerations in evaluating 'changed circumstances.'

- Creation of subbasin plans (BPA)
- Creation of salmon recovery plans (federal)
- Flood events
- New science and increased understanding of riparian forest and river connectivity as well as life history requirements of salmonids driven by advances in genetics, recovery and restoration techniques, habitat requirements for different life stages, supplementation strategies, etc.
- 1994 and subsequent fires (massive change in vegetation)

According to the 2005 Forest Planning Rule, ‘changed circumstances’ trigger a review of rivers’ eligibility for inclusion in the national Wild and Scenic Rivers system during the land management planning process. Clearly, over the past 16 years, many things have changed on the ground that impact rivers and how they are managed. One of the most significant changes is the listing of salmon, steelhead, bull trout and the spotted owl under the Endangered Species Act. We believe that now, more than ever, our best remaining rivers need permanent protection under the Wild and Scenic Rivers Act.

At our October 13 meeting, we presented several specific examples of rivers on the Wenatchee National Forest where changed conditions on the ground, or omissions in the last Forest Plan, should result in a review of rivers that the Forest Service found ineligible for the national Wild and Scenic Rivers system in the 1990 Forest Plan. Because we discussed several rivers and a suite of changes in our meeting, you requested that we send written comments to you. The attached information is preliminary and is not a formal proposal (which will come later), nor is it an exhaustive list, but is meant to illustrate why a review of Wild and Scenic Rivers is warranted in this Forest Planning process. We hope it will assist you in addressing Wild and Scenic Rivers in your ‘starting option’ for the Forest. At this time, we are restricting our comments to the Wenatchee National Forest and to eligibility only. We trust that you are compiling the Phase II eligibility study information for the Okanogan National Forest rivers, as we discussed at the meeting, and that you will be sending it to us in the near future.

Again, thank you for your time and your consideration of our input. After you have had a chance to review the information, we would like to meet with you again to further discuss this issue. Please don’t hesitate to contact Bonnie Rice at (206) 213-0330 if you have any questions.

Entiat River drainage

North Fork of the Entiat River

Wild & Scenic River Characteristics: The North Fork of the Entiat River has outstanding scenery, geology and ecology, and contains suitable habitat for the spotted owl. In its lower reaches, the North Fork flows through a beautiful narrow canyon.

Changes Since 1990 Forest Plan:

- At the time of the 1990 Forest Plan, there were plans to put a road in near the North Fork of the Entiat River for the purposes of timber harvest. The road and timber harvest were primary factors at the time in the Forest Service's decision to exclude the North Fork Entiat from eligibility in the national Wild and Scenic Rivers system; however, no road construction occurred
- ESA listing of the spotted owl
- The trail is now non-motorized, providing for a more primitive experience for the river visitor

Mad River

- **Wild & Scenic River Characteristics:** The Mad River has outstanding values for fisheries, ecology, recreation and scenery. Since 1990, several of the fish species that inhabit the Mad River have been listed under the Endangered Species Act, including spring Chinook, steelhead and bull trout. According to the Upper Columbia Salmon Recovery Board, the Mad River is "considered a stronghold for bull trout." Additionally, a genetically pure population of westslope cutthroat trout is present in the Mad River; this is rare within the Entiat drainage. There are no hatchery steelhead or coho present, therefore the Mad River can be used as a reference river for research purposes. The upper reach of the Mad River runs in an unusual crease along the crest of the Entiat Ridge, creating a unique riparian zone amidst a mostly dry pine forest. Additionally, the Mad River provides the longest low-elevation trail in the Forest and is popular for recreation. Off-road vehicle use, however, currently threatens plant, fish and wildlife species in the river corridor.

Changes Since 1990 Forest Plan:

- ESA listing of bull trout, steelhead and spring Chinook
- The 2005 Upper Columbia salmon recovery plan has identified the Mad River as an important recovery area for these species. The Mad River is classified as a "Category 1" watershed: "These watersheds represent systems that most closely resemble natural, fully functional aquatic ecosystems...protecting the functioning ecosystems in these watersheds is a priority"

Yakima River drainage

Cooper River (tributary to the Cle Elum River)

Wild & Scenic River Characteristics: The Cooper River drainage contains gorgeous scenery and provides exceptional recreation opportunities of regional significance for kayaking, regularly drawing people from across the state of Washington as well as Oregon, Idaho and British Columbia. Water quality is excellent, and the Cooper's deep pools are stunning. Bull trout are present in the Cooper River.

Changes Since 1990 Forest Plan:

- Land exchanges with Plum Creek Timber over the past decade have dramatically changed the land ownership pattern in the Cooper River/Cle Elum area including key parcels along the riparian corridor, bringing nearly the entire watershed into National Forest ownership
- In developing a management plan for the future of these lands, the Forest Service made a commitment in August 2006 to closure of the 4600-112 road and restoration of lands along the river
- Listing of bull trout under the Endangered Species Act
- Whitewater recreation on the Cooper River has increased considerably over the last 20 years

Silver Creek (tributary to the Yakima River)

Wild & Scenic River Characteristics: Silver Creek is a special, wild river in that it is an undammed hanging valley. It has outstanding values for scenery and geology, contains old-growth forest and a dramatic waterfall spilling out of the upper valley.

Changes Since 1990 Forest Plan:

- Not evaluated by the Forest Service in the 1990 plan

Teanaway River -West, Middle and North Forks; Stafford and Bear Creeks

Wild & Scenic River Characteristics: The forks of the Teanaway River contain outstanding values for scenery, ecology and wildlife. The West and Middle Forks of the Teanaway River provide outstanding undisturbed mid-elevation wildlife habitat south of the Alpine Lakes wilderness, and are important migration corridors for deer and elk. The Middle and North Forks also contain spotted owl habitat. Steelhead have been confirmed in the Middle Fork, and some biologists suspect that spring Chinook and bull trout are also present. The North Fork also contains a unique serpentine plant community.

Changes Since 1990 Forest Plan:

- There have been extensive land exchanges in this area since the last Forest Plan; leading to significant change in the land ownership pattern

- ESA listings of anadromous fish, bull trout and the spotted owl
- Recreational use of these rivers has increased and the geology of bedrock shelves creates unique features that have become popular with local kayakers

Related Note: Stafford and Bear Creeks have high-quality wildlife habitat and water quality and should be considered for wild and scenic status as part of the Teanaway River system.

Naches River drainage

Naches River (confluence with Little Naches/Bumping River to NF boundary)

Wild & Scenic River Characteristics: The Naches River provides important habitat for spring Chinook, steelhead, bull trout and westslope cutthroat trout. It has obvious scenic and recreational values, as it is overlain with the Mather Memorial Parkway designation. The river also provides spectacular opportunities for kayaks, canoes, and rafts and popularity of this river has increased as a destination. Of particular note, it is one of the few large east side rivers passing through a scenic landscape that is accessible for family-based recreation and retains a largely natural flow regime. In contrast, other large rivers pass through agricultural landscapes, have flow regimes that are highly regulated by dams with corresponding impacts on riparian landscapes, or are high-gradient reaches restricted to expert paddlers.

Changes Since 1990 Forest Plan:

- ESA listing of spring Chinook, steelhead and bull trout
- Key Watershed in the Northwest Forest Plan
- Significant increase in recreational boating use

Little Naches River (including Middle Fork)

Wild & Scenic River Characteristics: Outstanding values include cultural/historical and fisheries. Spring Chinook, steelhead, bull trout and westslope cutthroat trout inhabit the Little Naches. Crow Creek, a main tributary of the Little Naches, provides important spawning habitat for bull trout. According to local biologists, the Little Naches River is a stronghold for bull trout and it has high fish values. Additionally, as noted by the Forest Service previously, the Middle Fork of the Little Naches is significant culturally as a historic wagon trail – built in 1853 by the Longmire party, it was one of the first such routes over the Washington Cascades and has been used ever since. Its historic value is very high (as recognized by the Forest Service in the 1990 Forest Plan), and it is inextricably linked to the river. There was also intensive prehistoric use of the river, with several known archaeological sites and one identified Indian cultural site. The North Fork has large tracts of old-growth forest, which provide habitat for spotted owls (one such grove is specifically noted in the Plum Creek HCP). The Middle Fork provides important elk calving habitat.

The riprap and bank modification cited by the Forest Service as a reason for its ineligibility previously is, generally, fairly limited and unobtrusive and does not impact the nature of the river's flow. It should not be a reason for automatic disqualification of the Little Naches for inclusion in the national Wild and Scenic Rivers system.

Changes Since 1990 Forest Plan:

- ESA listing of spring Chinook, steelhead and bull trout

Other comments:

- The Little Naches has outstandingly remarkable values for historical/cultural, as noted by the Forest Service in the 1990 plan
- We believe an error was made in the 1990 Forest Service determination that riprap and bank modification should exclude the Little Naches River from eligibility

Bumping River

Wild & Scenic River Characteristics: The Bumping River has outstanding values for fish, wildlife and ecology. It provides important habitat for spring Chinook and steelhead up to Bumping Lake. A genetically-significant run of bull trout which spawns earlier than other runs – in August – is present. There is significant old-growth forest in the upper reaches of the river. The section of the Bumping River that begins at the confluence with the American River is contiguous with the Naches River a short distance downstream. This section has high scenic value, is popular for river-based recreation, and retains key elements of a natural flow regime given the significant contributions from the American River. The American River upstream was determined to be eligible under the previous Forest Plan and the section of the Bumping River that begins where the American River ends shares the majority of attributes that led to an eligibility determination for the American River.

Changes Since 1990 Forest Plan:

- ESA listing of spring Chinook, steelhead and bull trout
- The Bumping/American River system is a key watershed under the Northwest Forest Plan

Tieton River, including South and North Forks

Wild & Scenic River Characteristics: Outstandingly remarkable values include recreation, geology, wildlife, scenery, and fisheries. The South Fork of the Tieton and its tributary Indian Creek are very important spawning areas for bull trout; they also spawn in the North Fork. The mainstem Tieton attracts heavy recreational use by whitewater kayakers and represents the region's most important destination for commercial rafting in September. Presence of a dam and regulation of the flow does not automatically exclude the river from being eligible under the Wild and Scenic Rivers Act.

Changes Since 1990 Forest Plan:

- The land ownership pattern has changed extensively in the lower Tieton River drainage as well over the last decade, with acquisition of parcels by The Nature Conservancy and exchanges with Plum Creek Timber, Washington Department of Fish and Wildlife and the U.S. Forest Service
- Significant increase in recreational use – i.e. whitewater kayaking/rafting
- ESA listing of bull trout

Rattlesnake Creek

Wild & Scenic River Characteristics: Rattlesnake Creek has outstanding values for scenery, fish, wildlife, ecology and recreation. It contains important spawning and rearing habitat for federally-listed anadromous fish, including wild steelhead and spring Chinook. Bull trout and westslope cutthroat trout also spawn and rear in this creek. It provides a high opportunity for solitude, and Rattlesnake's rugged canyons, deep gorge, old-growth forest and deep pools provide spectacular scenery. It unquestionably has the 'feel' of a wild and scenic river. It has excellent water quality, and the river valley provides important habitat for the spotted owl. Access to these areas is available by whitewater kayak and it is one of the few rivers in the region with convenient water-based access that does not have a road running along the banks of the river.

Changes Since 1990 Forest Plan:

- ESA listing of spring Chinook, steelhead, bull trout and spotted owl

American River, Rainier Fork

Wild & Scenic River Characteristics: Flowing from the William O. Douglas Wilderness near Chinook Pass, the Rainier Fork of the American River presents a classic wild river with excellent scenic values visible from the Mather Parkway and Pacific Crest Trail.

Changes Since 1990 Forest Plan:

- Not evaluated by the Forest Service in the 1990 plan.

Wenatchee River drainage

Note: the following creeks were not evaluated in the 1990 Forest Plan:

*Nason Creek**Raging and Rock Creeks – tributaries to the Chiwawa River*

Wild & Scenic River Characteristics: These creeks contain important habitat for ESA-listed fish including spring Chinook, steelhead and/or bull trout. As such, we believe that they should be evaluated for eligibility in the national Wild and Scenic Rivers system for, at a minimum, their fisheries values. According to the 2005 Upper Columbia Salmon Recovery Plan, Nason Creek and the Chiwawa River are important recovery areas for

spring chinook, steelhead and bull trout. The Chiwawa River contains some of the highest-quality spawning and rearing habitat in the Wenatchee drainage, and Rock and Raging Creeks are important contributors to water quality. Rock Creek is a 'significant subwatershed' according to the Upper Columbia Regional Technical Team (established by the Upper Columbia Salmon Recovery Board), and is heavily used by bull trout. Nason Creek has high scenic and recreation values, and has emerged as a popular recreation destination for whitewater paddlers.

Changes Since 1990 Forest Plan:

- ESA listing of spring Chinook, steelhead and bull trout
- Increased recreational boating use

Little Wenatchee River

The Little Wenatchee River was determined eligible in the 1990 Forest Plan, but was not recommended to Congress for designation 'based on the value of other resources.' Linda thought that it had been recommended and is getting clarification.