



United States
Department of
Agriculture

Forest
Service

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National Forests
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File Code: 1900

Date: May 21, 2007

Bonnie Rice
American Rivers
4005 20th Avenue West
Suite 221
Seattle, WA 98199

Dear Bonnie;

We enjoy your interest and participation in the plan revision process around the subject of Wild and Scenic Rivers. Our conversations in meetings over the last months have helped to clarify your concerns and allowed us to share how the evaluation of W&S Rivers will be done in the context of the plan revision.

Changes in personnel on the Plan Revision team and other plan revision work slowed our response to your requests for information. You already have the information for the Wenatchee National Forest rivers. At our meeting on March 6, 2007 we provided you with the draft eligibility analysis for the Okanogan National Forest rivers and clarified that the Colville National Forest rivers are on the same timeline as the Okanogan - Wenatchee National Forest rivers.

We asked that you provide us with a written summary of your points around determining eligibility and we got those in your December 11, 2006 letter. You will find in this letter a reply to those points.

Your December 11, 2006 letter urges the Forest Service to reconsider rivers for Wild and Scenic eligibility. The Forest Service has concluded that an adequate and systematic inventory of eligible rivers has been previously completed and documented for the Okanogan - Wenatchee, and the Colville National Forests¹. The direction in Forest Service Handbook (FSH) 1909.12, Chapter 80, Wild and Scenic River Evaluation (January 31, 2006) allows this approach and further states that additional review of eligibility need be done only if changed circumstances warrant. The Forest Service will consider additional review of specific rivers if the public provides specific information on changed circumstances. We will consider the rationale provided by the public and decide whether or not to do an evaluation.

¹ 1988 Colville Forest Plan FEIS Wild and Scenic Rivers assessment and the Colville Forest Plan appeal #89-13-00-0013 resolution. 1989 Okanogan Forest Plan FEIS Wild and Scenic Rivers assessment and the Okanogan National Forest appeal #90-13-00-0119 resolution. 1990 Wenatchee Forest Plan FEIS Wild and Scenic Rivers assessment and the Wenatchee Forest Plan appeal #90-13-00-0164 appeal resolution.



In your letter you list nine items that you feel constitute changed conditions on the ground or are omissions/errors in the 1990 Wenatchee Forest Plan. We have reviewed these and find they do not warrant a new inventory of eligible rivers for these reasons.

“Changes in land ownership (private to public and vice versa, conservation easements, land trust holdings)” (Excerpt from December 11, 2006 Bonnie Rice letter.)

Changes in ownership may prompt the Forest Service to revisit an earlier evaluation of a river. One area on the Wenatchee National Forest has gone through an unusual amount of change in land ownership since the 1990 Forest Plan and this is the Plum Creek land exchanges in the Cle Elum Ranger District. The Forest has reviewed the eligible rivers in this area and concluded that change in ownership has not warranted addition of any rivers in this area to the list of eligible rivers.

“Endangered Species Act (ESA) listings (including spring Chinook, steelhead, bull trout, northern spotted owl) and required protection” (Excerpt from December 11, 2006 Bonnie Rice letter.)

Listing of a species under the Endangered Species Act is a legal process and does not change a physical condition. The listing itself does not have a direct connection to the identification of an outstandingly remarkable value.

In order to warrant further evaluation of the river, the species (populations or habitat) need to be dependent on the river, or an area within the river corridor. This is not the case for the northern spotted owl. In cases where the habitat is dependent on the river, such as the fish species you identify, consideration for eligibility includes determining whether the river is a nationally or regionally important producer of that species. The mere presence of these species is not an outstandingly remarkable value. The river would need to be a “conspicuous example ... from among a number of similar examples that are themselves uncommon or exemplary.” (FSH 1909.12, Chapter 80, 82.14)

An additional consideration is whether sustainability is dependent on that particular river being protected through designation as Wild and Scenic. The ESA listing adds protections to the species regardless of the status of the river and so, designation as a Wild and Scenic river is not necessary.

“Large increases in recreational use (particularly whitewater kayaking and rafting) and the corresponding increase in local businesses serving these users.” (Excerpt from December 11, 2006 Bonnie Rice letter.)

Recreational water use has increased since the 1990 Wenatchee Forest Plan was approved. However, water based recreation opportunities are wide-spread in the Region and those offered on the Wenatchee National Forest are not rare or unique.

"Creation of watershed plans and implementation (state law, created with the input of USFS staff)...Creation of subbasin plans (BPA)...Creation of salmon recovery plans (federal)" (Excerpt from December 11, 2006 Bonnie Rice letter.)

The completion of plans does not make any changes in the physical conditions nor have a direct connection to the identification of an outstandingly remarkable value.

"Flood events...1994 and subsequent fires (massive change in vegetation)" (Excerpt from December 11, 2006 Bonnie Rice letter.)

Floods and fires can change physical conditions of a river. The change needs to be linked to the effect of the flood or fire on an outstandingly remarkable value for a specific river. We did an adequate and systematic inventory of eligible rivers previously for the Okanogan-Wenatchee National Forests. As we reviewed this inventory, we considered these factors and they are not a basis for changes to our inventory. If you have specific rivers in mind, please provide this information.

"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." (Excerpt from December 11, 2006 Bonnie Rice letter.)

The new science needs to be linked to a specific river and an outstandingly remarkable value in order to warrant consideration for further evaluation of that river. If you have a specific river in mind, please provide this information.

After discussing general reasons for a new inventory, your letter went on to list specific rivers. You provided a list of rivers where you considered changed conditions on the ground warranted their inclusion in the list of eligible rivers. We are adding these to our list of rivers the public has suggested for further review and will consider them this summer. In the case of the Little Wenatchee River, the Record of Decision (March 2, 1990) for the Wenatchee Forest Plan determined the Little Wenatchee River is not suitable. When a river goes through a suitability analysis and is found not suitable the reasons for listing it as eligible are moot. The 1990 Wenatchee Forest Plan incorrectly listed this river as eligible. We can only conclude the preparers of the 1990 Plan made an error. That error will be corrected in the revised forest plan.

For reference, here is the list of rivers you included in your December 11, 2006 letter that will receive further review this summer.

Entiat River drainage

North Fork of the Entiat River:
Mad River

Yakima River drainage

Cooper River (tributary to the Cle Elum River):
Silver Creek (tributary to the Yakima River):

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

Naches River drainage

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

Little Naches River (including Middle Fork):

Bumping River

Tieton River, including South and North Forks:

Rattlesnake Creek

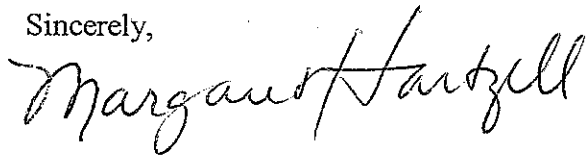
American River, Rainier Fork

Wenatchee River drainage

Nason Creek - Raging and Rock Creeks - tributaries to the Chiwawa River:

A apologize again for the time it took to reply to your letter. I hope to do better next time. We are available to work with you on the subject of wild and scenic rivers are part of the plan revision.

Sincerely,

A handwritten signature in cursive script that reads "Margaret Hartzell". The signature is written in dark ink and is positioned below the word "Sincerely,".

MARGARET HARTZELL
Plan Revision Team Leader