

September 22, 2011

Margaret Hartzell  
ID Team Leader, Forest Plan Revision Team, Colville, Okanogan-Wenatchee National Forest  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, WA 98840

r6\_ewzplanrevision@fs.fed.us Re: Panhandle National Forest Plan Revision

Dear Ms. Hartzell:

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 Colville National Forest. We are aware that you are in the process of revising your forest plan and thus your inventory of streams that are eligible for protection under the Wild and Scenic Act. To be eligible a stream must be free-flowing and have at least one "outstanding remarkable value" that is regionally or nationally significant.<sup>1</sup> These values (or ORV's) can include recreation, scenery, geology, history, fisheries, and others.

The Proposed Action identifies the Kettle River and South Salmo River as two rivers eligible for Wild and Scenic designation. In addition to continuing to implement the management direction identified in the Proposed Action for these two rivers, we believe Sullivan Creek should also be evaluated for Wild and Scenic designation. In our analysis, Sullivan Creek meets the criteria for eligibility based on several regionally and nationally significant values as outlined below.

### **1. Sullivan Creek (Headwaters to Pend Oreille River)**

<b>Tributary of:</b>	<b>Mileage</b>	<b>USFS Eligible</b>	<b>ORV's</b>
Pend Oreille River	20	No	S,R,F,W,H

- **Recreation:** Sullivan Creek offers paddlers an opportunity to float meandering Class II upper reaches, and a spectacular and remote Class V lower Canyon. Angling and



<sup>1</sup> Wild and Scenic Rivers Act, § 1273 (b)

camping opportunities abound throughout the watershed.

- **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.
- **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.

Additional Information:

- American Whitewater River Database pages:  
<http://www.americanwhitewater.org/content/River/detail/id/3508/>  
<http://www.americanwhitewater.org/content/River/detail/id/3507/>

## Conclusions:

We request that the Colville National Forest update the inventory of rivers and streams that are eligible for Wild and Scenic designation in the new Forest Plan, to include Sullivan Creek in addition to Kettle River and South Salmo River that are already identified as eligible. We hope that our feedback can help strengthen your evaluation. Thank you for considering these comments, and please feel free to contact me if you have any questions.

Sincerely,



Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director