February 1, 2015

Regional Forester Randy Moore
USDA Forest Service Region 5
Vallejo, CA

Via electronic mail


Dear Mr. Moore:


The agency and its hard working staff deserve recognition for conducting and completing this comprehensive inventory and releasing it for early public feedback prior to the completion and release of the draft Forest Plan Revisions (FPR). We appreciate the fact the Inyo and Sequoia Forests incorporated their previously completed inventories and eligibility decisions into the updated inventory and that the Sierra Forest similarly incorporated into the inventory their previous suitability recommendations for the North Fork, Middle Fork, South Fork, and main stem of the San Joaquin River.
We also appreciate that the Inyo Forest identified additional potentially eligible streams. But the Sierra Forest deserves special recognition for conducting what possibly is the most comprehensive WSR eligibility inventory we’ve seen in Region 5 and finding 640 miles of eligible streams.

However, we have identified a number of problems with the Inventory (including the incorporated previous inventories) that require attention. We are attaching these detailed comments in order to clarify and improve this process and its conclusions in preparation for the draft Forest Plan Revisions.

If you have any questions, please feel free to contact Steve Evans, WSR consultant for CalWild and Friends of the River at (916) 708-3155 or via email at sevans@friendsoftheriver.org.

Sincerely,

Steven L. Evans
Wild & Scenic Rivers Consultant
4920 Flora Vista Lane, Sacramento, CA 95822
(916) 708-3155
sevans@calwild.org

Authorized to sign for these people and organizations:
Ryan Henson, Senior Policy Director, California Wilderness Coalition
Eric Wesselman, Executive Director, Friends of the River (FOR)
Alan Carlton, Sierra Club California Executive Committee
Trudy Tucker, National Forest Chair, Tehipte Chapter Sierra Club
Fran Hunt, Eastern Sierra Organizer, Sierra Club
Stan Van Velsor, The Wilderness Society
Susan Britting, Executive Director, Sierra Forest Legacy
Lisa Cutting, Eastern Sierra Policy Director, Mono Lake Committee
Michael J. Connor, Ph.D., California Director, Western Watersheds Project
Patricia Puterbaugh, Lassen Forest Preservation Group
Don Rivenes, Executive Director, Forest Issues Group
Julie Anne Hopkins, Conservation Chair, CNPS Bristlecone Chapter

Cc: Christina Boston, Mike Dietl
General Comments About Inventory Documentation And Process

Unnamed Streams Not Inventoried (pg. 3) –

The inventory process appears to be restricted to rivers and streams named on 7.5-minute USGS quad maps. Unnamed tributaries can significantly contribute to the free flowing condition and outstanding values of an eligible named stream. Unnamed tributaries of the upper Truckee River were ultimately found eligible because they provide habitat for and contribute to the recommended river’s unusually remarkable Lahontan cutthroat trout fishery value.

For determining eligible river segments, segment termini, and boundaries, the Forest Service Handbook (FSH) advises to “Consider the entire river system, including the interrelationship between the main stem and its tributaries and their associated ecosystems which may contain outstandingly remarkable values.” (FSH 1909.12_82.61.2, pg. 8) The FSH guidelines indicate that the inventory should include named rivers on USGS 7.5 minute quad maps, but it does not limit the inventory only to those named streams.

Public Input on the Inventory (pgs. 3-4) –

The public sources cited provide useful information about streams that should be studied. However, there are other sources that should be consulted, including the Forest Service’s list of Critical Aquatic Refuges, Potential Aquatic Diversity Management Areas in the Sierra Nevada (SNEP Report Vol. III, Chapter 9), and American Whitewater’s National Whitewater Inventory. It should be noted that comprehensive inventories conducted by knowledgeable local Forest Service resource staff nearly always identify eligible streams in addition to those identified by the public.

Inventory Maps (pgs. 5-8) –

Public review and understanding would be improved if the forest-wide inventory maps in the Draft Forest Plan Revisions (DFPR) included the names of eligible segments and the background hydrological system (to better facilitate understanding of the connections to non-eligible streams). The maps should also depict existing and recommended WSRs, so that the public would be able to recognize that some of the newly-identified eligible streams are tributaries and

1 http://www.americanwhitewater.org/content/River/state-summary/state/CA/
contribute to the flow and outstandingly remarkable values of designated and recommended WSRs. The WSR appendix in the Draft Forest Plan Revision (DFPR) should include more detailed maps of each eligible segment showing the proposed river corridors, segments, and classifications. Consider the 10-15 year (or more) lifespan of the FPRs. It is essential that these WSR details be fully documented in the FPRs so that the agency can fully meet its responsibility to protect their free flowing condition and outstandingly remarkable values.

**Region of Comparison (pgs. 9-10) –**

Establishing the region of comparison helps determine whether a specific value is outstandingly remarkable. Consistent use of the region of comparison is critical to an adequate assessment. But care should be taken to avoid intentionally or unintentionally using the region of comparison to artificially winnow down the list of potentially eligible rivers and streams. The FSH provides broad discretion for determining the regions of comparison for each value. Consequently, each Forest use significantly different regions of comparison to identify outstanding values in the new Inventory.

**REGIONS OF COMPARISON USED IN THE WSR INVENTORY**

<table>
<thead>
<tr>
<th>VALUES</th>
<th>SIERRA NF (pgs. 80-81)</th>
<th>SEQUOIA NF (pgs. 65-66)</th>
<th>INYO NF (pg. 18)</th>
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<td>Sierra Nevada Province</td>
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<tr>
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<tr>
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</table>

We assume the Sierra Nevada Bioregion used to assess five values on the Sierra Forest is the same bioregion depicted on a map in the Forest Service’s Final Bioregional Assessment. The reviewing public may be tempted to assume that “Sierra Nevada Bioregion” and “Sierra Nevada Province” are the same, but they are not. The Forest Service’s Final Bioregional Assessment has a map of the bioregion that includes the Modoc and Lassen Forests, small portions of the Klamath and Shasta-Trinity Forests, as well as portions of the White, Inyo, and Tehachapi Mountains. The Sierra Nevada geomorphic province does not include the Modoc, Lassen, Klamath, and Shasta-Trinity Forests or the White and Inyo Mountains. In addition, Sierra Nevada Bioregion maps available on the Internet are widely varying,
so the Inventory should clearly indicate it is using the Bioregion depicted in the Bioregional Assessment.

Use of the Sierra Nevada Bioregion as defined in the Bioregional Assessment makes sense for both the Sierra and Sequoia Forests. For consistency, we recommend that the Sequoia Forest use the Sierra Bioregion instead of the Sierra Nevada Province. Given that the Inyo Forest straddles the southeastern portion of the Sierra Bioregion and the Great Basin/Deserts, it makes sense for the Inyo to use a subset of the two Bioregions.

The State of California region of comparison for fish, wildlife, and botanical values on the Sequoia Forest seems overly broad and it may have resulted in the Sequoia not identifying any new eligible rivers in the Inventory. In its previous inventory, the Sequoia used the Sierra Nevada physiographic region (which appears to be identical to the Sierra Nevada province) as the region of comparison for all values. We recommend that the Sequoia use the Sierra Nevada Bioregion for assessment of fish, wildlife, and botanical values.

Similarly, the State of California region of comparison for assessing prehistory, history, and cultural values also seems unnecessarily broad. Use of this expansive region may have contributed to the fact that the Sequoia identified no new eligible streams. Use of the Sierra Nevada physiographic province in the previous inventory resulted in these values being identified for the eligible segments of the Kings River.

Use by the Sequoia Forest of the Sierra Province region of comparison to identify scenic values is also problematic. It should be noted that most of the federally designated WSRs in the Sierra Nevada possess outstanding remarkable scenic values. The fact that these designated streams are large rivers is also a factor. Salmon Creek and Trout Creek may not have the same scenic values as the North and South Forks of the Kern River (and other designated rivers in the Sierra), but these smaller streams possess outstanding values in comparison to other streams of similar size in the Sierra. We suggest that the forest boundaries may be the more appropriate region of comparison for scenic values on the Sequoia Forest.

The Sierra and Sequoia Forests break down the general historical/cultural value into history, prehistory, and cultural. The Inyo simply lists history and prehistory values. It is unclear whether current-day cultural values of Native Americans (native materials gathering and sacred sites in use today) were considered in the Inyo Inventory. The Inyo Forest also decided that the region of comparison could vary depending on each site, but then determined that the chronic lack of knowledge about prehistory and history sites on the Forest precluded an assessment (see Inyo-specific comments further down).
Previous Inventories (pgs. 10-11) –

Both the Inyo and Sequoia Forests had previously completed at least partial WSR inventories. The background information from these previous efforts should be available to the public for review and comment in the context of the new Inventory. The Inyo Forest solicited public feedback in 1993 on its previous inventory, but background information as to why streams were not determined eligible was not available for public review. As far as we know, the 1991-95 Sequoia Inventory was never made available for public comment. Since it appears that many of the ineligibility decisions from these previous inventories have been incorporated into the new Inventory, it is important that all the information that led to ineligibility decisions be available for public review and comment.

Ineligible Streams –

The Inventory needs more background on why streams were determine ineligible, particularly those nominated in the public scoping process and those that survived the initial screening process and were reviewed more closely by the ID Teams. Simply providing a list of streams found to not possess outstandingly remarkable values does not provide sufficient information to the public. As noted above, information from previous inventories that resulted in ineligibility decisions for some streams should also be included.

Inyo Forest Specific Comments

Free Flowing Streams (pgs. 15-16) –

At least two streams nominated by the public (Black Canyon, Wet Canyon) are not included on the list of free-flowing rivers. But without any additional information available in the Inventory document, it is difficult for the public to determine why. Are they truly not free flowing or have they been accidently left off the list? George and Independence Creeks are also not listed on the free flowing list. They are free flowing and the BLM found segments of these streams downstream of the National Forest boundary to be eligible, with George Creek possessing outstanding fish, wildlife, and ecological values and Independence Creek possessing outstanding recreation, fish, and ecological values. Since these segments have been determined eligible by the BLM, the Forest Service should reconsider its ineligibility findings for the upper segments.

Eligible Streams (pgs. 19-22) –

We appreciate and support the identification of three additional eligible streams (Fish Creek, Rush Creek, South Fork Oak Creek). For the record, we believe that the upper Middle Fork San Joaquin (GIS Number 1.17, identified on pgs. 43-44 in the Previous Inventory section) is also a newly inventoried segment (see river specific comments below).
Rivers Determined Not Eligible (pg. 23) –

Dexter and Wet Canyons –

Dexter and Wet Canyons were nominated by the public and the Inventory lists them on pages 15-16 as free flowing (although Wet Canyon may be mistakenly identified as “Wet Fork”). Dexter Canyon is listed in the Inventory on page 23 as not possessing any outstandingly remarkable values. There is no mention of Wet Canyon on this page. Again, because little information is provided on why streams failed various screenings, it is difficult to determine why Dexter and Wet Canyons fail the outstanding values test in both the 1993 Inventory and the current Inventory.

Public scoping comments identified outstanding scenic, ecological, wildlife, and other values for Dexter and Wet Canyons. The fact that these streams are located in a distinct transition zone between the Sierra Nevada bioregion and the Great Basin/Desert bioregion underscores the unique ecological values of these streams.

The relative wetness of Dexter and Wet Canyons in a distinctively dry area is due in part to the Pacific moisture plume that makes its way east over Deadman Pass in the Sierra crest to a unique in the eastern Sierra transverse range formed by Bald and Glass Mountains and their associated highlands. Dexter and Wet Canyons are the primary drainages in the most geographically varied and ecologically rich region of the northern Inyo National Forest. The streams have created deeply incised steep-walled canyons reminiscent of the desert southwest, flowing through a landscape of rough hewn granite knobs, rolling uplands, and flat volcanic mesas.

Major meadows complexes (Crooked Meadows, Sentinel Meadows, and Wet Meadow) are the sources of Dexter and Wet Canyons and their tributaries. Locally limited but ecologically critical riparian habitat, including aspen groves, willow thickets, bunch grasses, and sedges are thick along the banks of both creeks. The uplands are dominated by old-growth lodgepole and Jeffrey pine forests, open sagebrush plains, and extensive snowbank aspen groves (distinct from riparian aspens). The incredibly diverse habitat provided by these streams supports goshawk, greater sage grouse, black-backed woodpeckers, willow flycatchers, nesting golden eagles, badgers, abundant mule deer, and brook trout.

According to a report from Trout Unlimited, Dexter and Wet Canyons are a subset of drainages flowing northeast from the Bald-Glass transverse range that possess some of the highest aquatic integrity scores in the eastern Sierra region. Because they contribute significantly to the overall values of Dexter Canyon, we propose that the unnamed tributary that rises from Sentinel Meadow and Wild Cow Canyon be included in the eligibility assessment for Dexter Canyon.
Rush Creek –

A 3.5-mile segment of Rush Creek from its headwaters to Waugh Lake was determine eligible in the new inventory due to outstanding scenic and recreation values (pgs. 20-21). Apparently, the remaining downstream segments of Rush Creek were determined to be free flowing (page 16) but were winnowed out in the initial screen for outstanding values.

Rush Creek is the largest tributary of Mono Lake – an outstanding natural feature of the Inyo National Forest that attracts thousands visitors from all over the world. Congress recognized the lake’s significance and the lower segment of Rush Creek and the other streams that feed into it by establishing the Mono Basin Scenic Area in 1984. The Scenic Area was established to protect the Basin’s geological, ecological, cultural, scenic, and other natural resources. Mono Lake was in danger of drying up due to major diversions from its tributary streams until a series of historic court decisions and a landmark state water rights ruling required the restoration of fresh water flows in Rush Creek and other major tributaries to restore the health of the lake. Because of their statewide significance, these rulings represent an outstandingly remarkable historical value. The restored flow from Rush Creek into Mono Lake represents an outstandingly remarkable hydrological/ecological value.

We believe the lower segments of Rush Creek support outstanding geological, wildlife, cultural, and recreation values as well. The creek cuts through an Ice Age lakebed as it flows into the Mono Lake, creating bottomlands habitat and a creek delta rare in the Great Basin. Riparian habitat along Rush Creek supports the highest concentrations of yellow warblers in California and is now attracting endangered willow flycatchers. Native Americans formerly used this section of Rush Creek as a summer home and for ceremonial purposes. The lower creek also attracts visitors seeking all types of recreational pursuits, including fishing, photography, and birding (particularly in the delta).

Although LADWP owns inholdings along Rush Creek, the Forest Service has full authority to assess streams within the boundaries of the federal reservation it manages (which includes both the Inyo Forest and the Mono Basin Scenic Area). We believe the entire creek within federal reservation boundaries (including segments within inholdings) should be eligible, due to its outstanding historical, recreational, wildlife, hydrological/ecological values, and cultural values.

Birch Creek –

Birch Creek was apparently determined to be free flowing (pg. 15) but apparently the Forest Service did not identify any outstanding values. Birch Creek supports a lush riparian corridor at the boundary of the Mojave and Great Basin deserts. The creek’s rich birch-cottonwood riparian forests host a recently discovered isolated population of Black Toad, a California Fully Protected Species. The presence of Black Toad is unique within the region of comparison. Black Toads occupying this
canyon are completely dependent on Birch Creek and are isolated from lower elevation populations at Deep Springs Lake and Cuna Springs.

Birch Creek also contains unique geology as recognized in the Deep Spring North Potential Wilderness Narrative: “A central feature in the area is the Birch Creek granite batholith, which is emplaced amidst the parent sedimentary rocks of the White Mountains. The Birch Creek drainage comprises the majority of the area. Portions of the creek have perennial flows, and the creek is noted for its travertine formations and the canyon it has formed through the granite batholith.” We believe that Birch Creek possesses outstandingly remarkable scenic, geological, wildlife, and ecological values and it should be identified as eligible in the Inventory.

O’Harrel Canyon Creek –

O’Harrel Canyon Creek is free flowing (page 16) but is listed as not possessing any outstanding values (page 23). Even though the threatened Lahontan cutthroat trout population was transplanted to the O’Harrel Creek, this fact should not automatically discount this potential outstandingly remarkable fishery value. Lahontan cutthroat trout populations transplanted to creeks have been found to be outstandingly remarkable on other Forests (the Stanislaus most notably). Eligibility would not hinder any on-going restoration efforts in the creek. In addition, the creek flows out of a rugged and scenic canyon on the south side of the Glass Mountains. We believe the creek possesses outstandingly remarkable fish and scenic values.

Rivers Determined Not Eligible: Fishery/Wildlife Values (pg. 23) –

The National WSRs Act defines river as “a flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes.” This definition includes ponds or wet meadows that may support outstandingly remarkable populations of amphibians (including Sierra and mountain yellow-legged frogs, Yosemite Toad) – they should not be automatically excluded from consideration.

The fact that some endangered fish populations (Owens tui chub in Little Hot Creek for example) were transplanted to the streams, should not exclude consideration as an outstanding value. Several human-established populations of Lahontan cutthroat trout have been found to be an outstandingly remarkable fishery values on other Forests. On the Inyo Forest, the transplanted population of Paiute cutthroat trout in Cottonwood Creek (White Mountains) was an agency-identified outstanding fishery value that ultimately led to the creek’s designation in 2009.

It is fortunate for the native Owens tui chub that man-made dams have preserved remnant populations of this endangered fish. It is unclear whether the statement about Owens tui chub on Inventory page 23 is implying that the Little Hot Creek population is located solely in a dam-created pond or that a portion of the population is indeed found in Little Hot Creek upstream of the pond. If the latter
situation is true, than it would appear that Little Hot Creek supports an important outstandingly remarkable fishery value. Clarification is required.

**Rivers Determined Not Eligible: Prehistory (Cultural)/History Values (pgs. 23-24) –**

We are concerned about the reasoning that no Inyo Forest streams (even those previously identified as eligible) possess outstanding historical/cultural values because the significance of most sites on the Forest have yet to be determined. The 1993 Inyo inventory identified at least five streams with outstanding historical/cultural values even with the acknowledged lack of forest-wide of historical/cultural information. Other Forests have identified eligible streams with outstanding historical/cultural values even though incomplete cultural resource inventories is a chronic problem shared by virtually all National Forests.

Guidelines require the use of both professional judgment and best available information to identify values. A cursory internet search and review of existing documents confirms historical and cultural values for these and other streams. For example:

- The Bennettville interpretive site adjacent to Lee Vining Creek has “several 100-year-old mining buildings” and “is recognized locally as an important site” (1988 Inyo Forest Plan, pg. 158). The oldest campsite in the Mono Basin is also located near the Lee Vining Ranger Station on Lee Vining Creek. These represent outstanding historical values.

- Bloody Canyon through which Walker Creek flows was a major prehistoric travel route between the Mono Basin and San Joaquin Valley and there are numerous nearby prehistoric sites (1988 Inyo Forest Plan, pg. 160).

- Historic mining sites along Mammoth Creek (Hayden Cabin, Consolidated Mine) have been interpreted for the public and attract recreational visitors. Current management direction is to “Maintain and enhance cultural resource interpretive sites” for these cabins and for the “Indian Caves” site along Sherwin Creek (1988 Inyo Forest Plan pg. 193). If these sites are of sufficient importance and interest to invest resources for public interpretation, than they may constitute combined outstanding historic and recreational values.

- The historic route of the Jordan Toll Road and associated sites at Jordan Hot Springs and Casa Vieja Meadows along Nine Mile and Olancha Creeks appear to be outstanding historical values.

At the minimum, the Inventory should be adjusted to recognize known values. This information can be revised in a future FPR as more information becomes available.
Previously Evaluated Inventory (pgs. 24-64) –

We appreciate and support the incorporation of all eligible streams identified in 1993 in the new inventory. Stream-specific comments are below.

Cottonwood Creek (pgs. 26-31) – The segment descriptions are confusing and apparently do not correspond to the segment classifications depicted on the map on page 6. At least one segment downstream of the Cottonwood Lakes Road within the Golden Trout Wilderness is erroneously classified Scenic – it should be classified as Wild.

Golden Trout Creek (pgs. 31-32) – Volcano Creek, a major tributary of Golden Trout Creek, is part of the Golden Trout/Volcano Critical Aquatic Refuge (CAR). Golden Trout are numerous in both streams. Volcano Creek clearly complements and is part of the outstanding fishery values of the Golden Trout Creek system and should be found eligible.

Hot Creek (pg. 32-33) – The Inventory should note that the BLM found a one-mile segment of this creek directly downstream of the Forest boundary to be eligible in recognition of its outstandingly remarkable geological, fish, wildlife, and hydrological values. The Inventory should consider revising the Forest Service identified values to include the additional wildlife (exceptionally high value riparian habitat) and hydrological (greatest average annual discharge of all Lahontan streams) values identified by the BLM.

Lee Vining Creek (pgs. 35-39) – The lower segment of Lee Vining Creek downstream of the LADWP diversion pond was not found eligible. In addition, the overall importance of this second-largest tributary to Mono Lake, in maintaining the lake’s health, is ignored. Like Rush Creek, diversions from Lee Vining Creek were contributing to the decline of Mono Lake and were halted by a series of landmark court and regulatory rulings with historic statewide implications. The oldest know campsite in the Mono Basin at the Lee Vining Ranger Station is also located on this segment – a likely outstanding historical value.

The entire creek is essentially a gateway to both Yosemite National Park and the Mono Basin Scenic Area, which attract visitors from across the nation and around the world. This recreation value is not mentioned in the Inventory. The segment of the creek downstream of Highway 395 is visited by hundreds of people who hike along the relatively new Lee Vining Creek Trail from the town of Lee Vining to the Mono Basin Scenic Area Visitors Center, enjoying magnificent views of Mono Lake and the creek’s restored flows and riparian habitat along the way. These are outstanding recreation and scenic values.

The fact that much of this lower segment is located within LADWP inholdings should not preclude its eligibility. The Forest Service has full authority to assess streams within the boundaries of the federal reservation it manages (which includes both
the Inyo Forest and the Mono Basin Scenic Area). We believe the entire creek within federal reservation boundaries (including segments within inholdings) should be eligible, due to its outstanding historical, recreational, scenic, and hydrological/ecological values.

Lone Pine Creek (pgs. 39-42) – The Inventory should recognize and at least acknowledge the opportunity to expand the eligibility finding for this magnificent creek downstream by including at least two miles of the stream on BLM lands within the Alabama Hills Recreation Area the proposed Alabama Hills National Scenic Area. The BLM segment shares identical scenery and recreation values.

Middle Fork San Joaquin River (pgs. 43-44) – This is a new eligible segment. It was not included in the Inyo 1993 Assessment or included in the segments determined eligible and recommended in the 1991-92 Sierra Forest Plan (the Sierra took the lead on assessing segments of the river on the Inyo Forest up to Thousand Island Lake and within Devil’s Postpile National Monument). This new eligible segment enhances the existing recommended segments by including Thousand Island Lake (a nationally recognized waterscape documented worldwide in calendars, magazines, books, and other publications) and its upstream headwaters.

Mill Creek – Apparently, the segment of Mill Creek downstream of Lundy Lake was found to be free flowing, but for reasons not documented in the Inventory, it failed the outstandingly remarkable value screening process. Mill Creek is the third largest tributary to Mono Lake. It provides outstanding scenic vistas of both the lake and the high Sierra, offers a wide variety of stream-based recreation, and sustains riparian and wetland habitat that supports a high species composition of songbirds and nesting habitat for waterfowl. The lower segment should be found eligible with outstanding scenic, recreation, and wildlife values.

Parker Creek (pgs. 50-51) – The information in the Inventory is insufficient to determine why Parker Creek downstream of the wilderness boundary was not determined eligible. The creek is no longer diverted by LADWP, so it is free flowing. Aspen groves along the segment below the wilderness boundary provide an outstanding fall color display and opportunities for dispersed camping. These scenic and recreation values complement those identified for the upper segment. We recommend that all of Parker Creek within the federal reservation boundary be determined eligible.

Rock Creek (pgs. 51-55) – The Inventory should note that the BLM found a 1.5-mile segment of this creek directly downstream of the Forest boundary to be eligible in recognition of its outstandingly remarkable recreational, geological, and ecological values. The Inventory should recognize that the USFS-BLM segments are complementary and consider revising the Forest Service identified values to include the additional geological (good example of stream erosion through volcanic bedrock) and ecological (excellent aquatic and riparian habitat, biologically diverse vegetation) values identified by the BLM.
South Fork Bishop Creek (pgs. 55-56) – On page 55, the narrative clearly describes outstandingly remarkable scenic values but inexplicably concludes: “Scenery is not an outstandingly remarkable value.” Then on page 56, the Summary of Eligibility Findings notes, “Scenery and recreation are outstandingly remarkable values.” These conflicting statements should be corrected and the document revised to document the stream’s outstanding scenic value.

Walker Creek (pgs. 62-64) – LADWP diversions from Walker Creek have been discontinued and the creek should be considered free flowing. No outstandingly remarkable historical-cultural value is identified, even though the 1988 Inyo Forest Plan notes that the Walker-Parker Management Area possesses numerous prehistoric sites and that “Bloody Canyon served as a major prehistoric travel route to the Mono Basin from the San Joaquin Valley.” In addition, the Inyo’s 1993 Inventory identified this outstanding cultural value.

**Sequoia Forest Specific Comments:**

Review of Previously Evaluated Inventory (pgs. 67-79) – We appreciate and support the incorporation into the new Inventory of all eligible streams identified in 1991-95 screening process, including segments of the Little Kern River, North Fork Tule River, North Fork Middle Fork Tule River, Kings River (segments 3-4) and the lower Kern River. We also appreciate and support retention of the suitability recommendation for the short segment of the South Fork Kern studied separately in 1991.

Streams “Screened” Out Of The Previous Inventory –

The new Inventory provided to the general public lacks information on the streams that were determined ineligible in the 1991-95 screening process. We requested and were provided the background documents cited on page 70, which were incorporated into a 196 page document entitled Wild and Scenic River Historical Eligibility Review, Sequoia National Forest Technical Report, by Mary Cole, Forest Landscape Architect and Recreation Planner, dated Oct. 27, 2014. The report documents a somewhat complicated seven-step screening process conducted over four years.

**2014 Technical Report Comments and Concerns –**

Upon review of the background documents in the 2014 Technical Report, we must question the ultimate ineligibility decisions for several streams, including:

- Rattlesnake Creek (Cannell Meadow District) – Not listed in the initial District screening inventory matrix (Sep. 23-25, 1991), so presumably no potential outstanding values were identified.
• Mill Flat Creek – Not listed in the initial District screening inventory matrix (Sep. 23-25, 1991), so presumably no potential outstanding values were identified. This creek deserves a second look in the new Inventory since the Forest Service identified the Mill Flat Creek watershed as a Critical Aquatic Refuge for western pond turtles and native fish species.

• Durwood Creek – The initial District screening inventory matrix (Sep. 23-25, 1991) identified potential scenic and ecological values. The creek was not listed in the subsequent narrative report (Sep. 30, 1991). However, the subsequent ranking form (Jan. 23, 1992) noted “Level 3” scenic and “other” values.

• Fish Creek – The initial District screening inventory matrix (Sep. 23-25, 1991) identified potential recreation, wildlife, cultural, and ecological values. The subsequent narrative report (Sep. 30, 1991) confirmed these values. The subsequent ranking form (Jan. 23, 1992) noted “Level 1” cultural and “Level 3” scenic, wildlife, and “other” values.

• Trout Creek (including tributaries Little Trout Creek, Machine Creek, Snow Creek) – The initial District screening inventory matrix (Sep. 23-25, 1991) identified potential scenic, recreation, cultural, and ecological values. The subsequent narrative report (Sep. 30, 1991) confirmed these values. The subsequent ranking form (Jan. 23, 1992) noted “Level 2” cultural and “Level 3” scenic, recreational, and “other” values. Trout Creek tributaries (Little Trout, Snow, and Machine Creeks) were identified rated with “Level 3” scenic, recreation, cultural, and other values.

• Salmon Creek – The initial District screening inventory matrix (Sep. 23-25, 1991) identified potential scenic, wildlife, and cultural values. The subsequent narrative report (Sep. 30, 1991) confirmed these values. The subsequent ranking form (Jan. 23, 1992) noted “Level 2” scenic and cultural and “Level 3” wildlife values.

• Dry Meadow Creek – The initial District screening inventory matrix (Sep. 23-25, 1991) identified potential scenic, recreation, wildlife, cultural, and ecological values. These were confirmed in the screening narrative report (Sep. 30, 1991), which noted that the creek “appears to possess the greatest number of Outstanding Remarkable values” on the Greenhorn Ranger District. The subsequent ranking form (Jan. 23, 1992) noted “Level 2” wildlife and ecological and “Level 3” scenic and cultural values values.

The Sep. 30, 1991 narrative report concluded that Dry Meadow Creek, Fish Creek, Trout Creek, Salmon Creek and others identified with outstanding values had “the most potential for inclusion in the Wild and Scenic Rivers System” and that the findings suggested that “Dry Meadow Creek, and the Fish and Trout Creek systems
(in addition to the Tule and White Rivers) be given priority”, with “lesser, but equal priority” given to Salmon Creek and other streams. At this point, Durwood Creek, previously identified with potential scenic and ecological values, has been screened out.

The May 15, 1992 narrative report concluded that Salmon and Trout Creeks possess “at least one outstandingly remarkable resource value.” Dry Meadow Creek (the stream previously recognized as possessing the “greatest number” of outstanding values) and Fish Creek appear to have been dropped from the screening process.

Brief narrative descriptions in this report note that Salmon Creek’s scenic values consist of “Scenic view of Big Meadow and Salmon Creek gorge.” It also notes that Salmon Creek “appears accessible to the physically challenged at many locations in its upper reaches...”, but this appears to be an outstanding recreation value listed under the scenic value subheading. The same narrative describes Trout Creek’s scenic value as “A relatively unmodified watershed with spectacular views of domes within the Dome Land Wilderness...”

**Previous Inventory – Salmon and Trout Creeks –**

Only a handful of field verification reports are attached to a Sep. 8, 1992 memo to District Rangers calling for field verification of potentially eligible segments. No field verification reports are provided for Dry Meadow, Durwood, and Fish Creeks. The field verification report for Salmon Creek confirms its outstandingly remarkable scenic and recreation values. The field report for Trout Creek notes the spectacular view of the Dome Land Wilderness, but also adds “Deep, rocky canyon...”

A more detailed field verification narrative is found further into the documents, submitted by Cheryl Bauer and dated April 12, 1993. The narrative report for Salmon Creek states:

> The entire Salmon Creek corridor is considered distinctive, or Variety Class A, with the landscape character typ. Attractiveness of the corridor is enhanced by the diversity of features that include jagged rock outcrops and peaks, bedrock gorges with cascades and pools, Salmon Creek Falls, and Big Meadow. The Salmon Creek area is accessible to the physically challenged at many locations in its upper reaches.

But then the report concludes, “While the views are excellent, they are typical of scenic qualities in the Kern River area and are not considered to be rare or unique.”

The report documents a diversity of recreational opportunities provided by Salmon Creek, including fishing, camping at Horse Meadow Campground, hunting, nature study opportunities in Big and Horse Meadows and along the creek’s riparian habitat (spanning thousands of feet of elevation), and hiking on the Salmon Creek...
The majority of Trout Creek remains in a natural condition and is generally accessible. The streamside corridor in this segment is considered distinctive, or Variety Class A, within the landscape character type. Waterfalls, a deep rocky canyon, plant species diversity, and spectacular views of the domes within the Dome Land Wilderness enhance the characteristics of this free-flowing stream.

But then the report concludes, “While the views are excellent, they are typical for the Sierra Nevada and do not afford outstandingly remarkable features.” This determination is clearly not supported by the narrative. Trout Creek has distinctive scenery, including spectacular views of domes in the Dome Land Wilderness. We doubt that these scenic values are “typical” of streams throughout the Sierra Nevada.

For Trout Creek’s fish and wildlife values, the report states:

The feature of most importance to wildlife in the Trout Creek drainage is the Machine, Little Trout, and Snow Creek drainage complex. This area is outstanding as it contains virgin old-growth forests. This type of ecosystem is not common on the District, Forest, or the Southern Sierra. Wilderness areas contain similar features, but this forest may be the southern-most old-growth forest in the Sierra Nevada. In particular, the complex of three drainages is important to several sensitive species requiring mature, closed canopy forests with low levels of disturbance. Species such as the California spotted owl, marten, fisher, and long-tailed weasel are known to use the area. These represent some of the southern-most records for these species.

In addition, the report documents this “Other Similar” value:
The Little Trout Creek tributary flows into the Twisselman’s Botanical Area. The area lies approximately one mile north of Big Meadow and contains 859 acres. One of its unique features is it represents the southern limit of foxtail pine. Foxtail pine is found throughout the area with the exception of some of the lower elevations. Limber pine is also found here at its most southern population in the Sierra Nevada. Altogether, six plant associations are represented in the Botanical Area that form a unique mosaic of vegetation in the southern Sierra Nevada. These associations are: foxtail pine forest, subalpine/mixed conifer forest, red fir forest, rock outcrop, montane chaparral, and mountain meadow-streambank.

Inexplicably and in direct contradiction of these detailed narratives, the report concludes that Trout Creek’s old growth ecosystem “is not the only one of it’s (sic) type in the Sierra Nevadas (sic) and is, therefore, not determined to be a significant feature.” Similarly, the report concludes that the Twisselman Botanical Area, even with its unique features, “is not the only one of it’s (sic) type in the Sierra Nevada and is, therefore, not determined to be a significant feature.” In fact, the narratives clearly identify outstandingly remarkable wildlife, ecological, and botanical values for Trout Creek and its tributaries that are unique to the southern Sierra and therefore outstanding in the context of the entire Sierra Nevada, and perhaps the entire state.

The report also documents diverse recreational opportunities associated with Trout Creek, including fishing, dispersed camping along its entire length, hunting, nature study, and multiple hiking trails. However, it also concludes that these are not outstandingly remarkable. In regard to Trout Creek’s cultural values, the narrative report notes at least five historic and prehistoric sites but concludes that they are not outstandingly remarkable.

**Summary Analysis Of Previous Eligibility Screening –**

It is unclear whether the Oct. 27, 2014 combined technical report represents the entire administrative record of the Sequoia’s 1991-95 eligibility screening. A thorough review of the previous inventory documents suggests that there may be materials missing from the previous inventory. What is clear is that the administrative record does not show why many streams were eliminated in the 1991-95 screening process. Rattlesnake Creek on the Cannell Meadow District and Mill Flat Creek were eliminated early in the process with no explanation. Durwood, Fish, and Dry Meadow Creeks were eliminated in subsequent screenings, all without explanation. There are no narrative details provided to support initial findings of no outstanding values for some streams and similar but subsequent conclusions for other streams where potential values were initially identified.
The April 12, 1993 final narrative reports do provide quite useful information about Salmon and Trout Creeks. However, the ultimate conclusions of ineligibility for these creeks are not supported by these narratives, which clearly identify outstandingly remarkable scenic, recreation, and cultural values for Salmon Creek and outstandingly remarkable scenic, recreation, wildlife, ecological, and botanical values for Trout Creek.

Since the 1991-95 inventory was conducted, the Forest Service identified a system of Critical Aquatic Refuges (CARs) that support at-risk aquatic species throughout the Sierra Nevada. Both Trout and Fish Creek are CARs established to protect golden trout. The Mill Flat Creek CAR was established to protect western pond turtle and native fish species. However, nothing in the new Inventory provides any assurance that these new circumstances were considered as required by the planning rule.

Page 65 of the December 2015 Inventory, notes that “The interdisciplinary team reviewed the original work (1991-1995) for accuracy and completeness.” The same paragraph notes that, “The interdisciplinary team determined that for the most part, the original 1991 inventory was more comprehensive than the current required inventory.” However, it is unclear whether the streams identified in the 1991-1995 inventory were subsequently re-inventoried in the new process using current guidelines that assist with identifying regions of comparison and provide guidance on identifying specific outstandingly remarkable values, and to assess potential changed circumstances (CARs for example).

Use of the region of comparison in the previous inventory seems particularly inconsistent for Trout and Salmon Creeks. The April 12, 1993 final narrative report clearly states that the distinctive scenery of Salmon Creek is not considered outstanding in the comparative region of the Kern River area, while at the same time claiming that the distinctive scenery of Trout Creek is not outstanding in the comparative region of the Sierra Nevada. The new Inventory uses the Sierra Nevada Province for the region of comparison. Use of different regions of comparison appears arbitrary without any explanation provided as why two creeks in the same region were assessed using different regions of comparison.

Review of the 2014 Technical Report documents also raises the question of whether the eligibility determination for the North Fork Middle Fork Tule River was unnecessarily restrictive. The May 15, 1992 Eligibility Screening Report identified the North Fork Middle Tule River from the powerhouse upstream to its headwaters at Summit Lake to possess potential scenic, historical, and ecological values. The Oct. 16, 1995 Tule River Analysis identified only an outstandingly remarkable ecological value for the river and limited the eligible segment of the river located in the Moses Mountain Research Natural Area (RNA).

The RNA contains an “excellent representation” of giant sequoia, white fir, and red fir dominated forests. The 1989 establishment report for the RNA also highlights the river’s well developed riparian and meadow zones, diverse fauna, and rare plants.
Downstream segments of the river host the Silver Creek and Wishon giant sequoia groves and share many of the other ecological values identified for the RNA. This supports finding all of the North Fork Middle Fork from its headwaters to at least the Doyle Springs private property boundary to be eligible.

We request that Mill Flat Creek, Rattlesnake Creek (Cannell Meadow District), Durwood Creek, Fish Creek, Trout Creek (and its tributaries), and Salmon Creek be reassessed for eligibility using the most up to date information (such as CARs) and eligibility guidelines. Based on the existing administrative record alone, we strongly believe that Trout and Salmon Creeks possess outstandingly remarkable scenic, recreation, cultural, wildlife, ecological, and botanical values. We also request that the entire segment of the North Fork Middle Fork Tule River from its headwaters to the Doyle Springs private property boundary be considered eligible.

**Sierra Forest Specific Comments**

The Sierra National Forest deserves special recognition for conducting a very expansive and pro-active WSRs inventory. The new inventory identifies 124 segments totaling 640 miles of potentially eligible streams. The Forest also deserves kudos for taking an obvious “systems” approach as recommended in the FSH by identifying as potentially eligible many tributaries of existing and recommended WSRs, including the South Fork Merced, North and Middle Forks San Joaquin, and the Kings River. In addition, we appreciate that the new inventory confirms the previously determined eligibility of the unprotected portion of the Kings River downstream of the existing WSR segments.

**Recreational Classification of Wilderness Segments –**

It is difficult to determine without more detailed maps, but a number of eligible segments located in existing Wilderness, including the West Fork Granite Creek, the South Fork San Joaquin downstream of Mono Hot Springs, Laurel Creek, upper North Fork Kings River, and upper Rancheria Creek, are classified as recreational or scenic, instead of wild. Other wilderness segments appear to have lesser classifications because of their proximity to OHV trail cherry-stems.

The stream-specific discussions note that water quality is “unknown” on some of the streams, which may have something to do with the lower classification (The WSRs Act requires wild segments to meet or exceed Clean Water Act water quality standards.) However, none of the streams in wilderness that are classified as scenic or recreational appear to be on the state/EPA 303d water quality impaired list. Since water quality in streams in wilderness areas is typically good, the presumption should be in favor of wild classification unless a specific water quality problem is identified.
**Dinkey Creek (pgs. 103-107) –**

We support the Inventory's eligibility finding for upper Dinkey Creek (from its source in the Dinkey Lakes Wilderness to Strawberry Meadow) but we are astonished and disappointed that apparently the Forest Service believes that the creek downstream of Segment 4 (as described in the Inventory) is not eligible. Perhaps the lower segments were not included because it was once targeted for hydroelectric development, but this should not affect eligibility. We strongly believe that the entire creek from its source to its confluence with the North Fork Kings River is free flowing and possesses outstandingly remarkable scenic, recreation, geological, historical, cultural, wildlife, and ecological values (detailed below and in joint scoping comments from CalWild/FOR dated 9.29.14). The Inventory should be revised to include the additional segments of lower Dinkey Creek and additional outstandingly remarkable values for these segments.

**Dinkey Creek Segments (pgs. 103-104) –**

Add Segment 5 – From the end of Segment 4 (a point south of the gauging station and north of Strawberry Meadow) to the Turtle-Ross Creeks confluence (downstream of Ross Crossing). This 6-mile (approximate) segment should be classified as Scenic.

Add Segment 6 – From the Turtle-Ross Creeks confluence to approximately 1-mile upstream of the confluence with the North Fork Kings Rivers. This approximately 6-mile (approximate) segment should be classified as Wild.

Add Segment 7 – From approximately 1 mile upstream of the North Fork Kings River confluence to the North Fork Kings River confluence. This 1-mile (approximate) segment should be classified as Recreational.

**Dinkey Creek Outstandingly Remarkable Recreation Values (pg. 105) –**

The determination that Dinkey Creek possesses no outstandingly remarkable recreation values is not supported by the narrative or by readily available public information. Although some of the known recreation values of creek, when considered individually, may not be outstandingly remarkable on their own, they collectively contribute to a diverse spectrum of recreation opportunities provided by Dinkey Creek that may well be unique to California. The diverse recreation opportunities found in all segments of Dinkey Creek from its headwaters to the North Fork Kings confluence collectively constitute an outstandingly remarkable recreation value.

By segment, these outstandingly remarkable recreation values include:

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2 Pg. 105 lists no outstandingly remarkable recreation values for Dinkey Creek segments 1-4. Table 23 on pg. 202 lists an outstandingly remarkable recreation value for segment 2. We believe all segments of Dinkey Creek possess outstanding recreation values.
Segment 1 – The Forest Service concluded that the described recreation opportunities were not outstandingly remarkable. We disagree. This segment in particular provides Wilderness-based recreation, including one of the more popular and easier trails accessing the Dinkey Lakes Wilderness, with opportunities for a six-mile loop trip. When considered together with all other recreation values of the entire creek, this segment stands out and complements the other values by providing a high-elevation recreation experience along the upper creek and its headwater lakes.

Segment 2 – The Forest Service concluded that the described recreation opportunities were not outstandingly remarkable. We disagree. The agency’s own narrative notes that this segment provides “unique” geological viewing of the Dinkey Creek Roof Pendant Geological Area (DCRPGA). Table 23 on page 202 notes an outstandingly remarkable recreation value for this segment. In addition, the segment includes the trailhead into the Dinkey Lakes Wilderness and the Swamp OHV Trailhead. We believe that these recreation values are part of the creek’s overall outstandingly remarkable diverse recreation opportunities.

Segment 3 -- The Forest Service concluded that the described recreation opportunities were not outstandingly remarkable. We disagree. This segment includes the unique “Super Dink” class V kayak run, including “Infinislide” – one of the longest rapids of its kind in California. The lower end of this segment offers rare opportunities for campers, visitors, and spectators from the Dinkey Creek Recreation Area to view expert kayakers running the Infinislide and other class V rapids downstream. Below is a sample of what expert kayakers think of this unique run:

“One place with many names, the "Infinislide" section of "SuperDink" on Dinky Creek is the run that Dry Meadow Creek wishes it could be. Half as photogenic; ten times better kayaking... it is certainly worth a yearly pilgrimage and should be high on the list if you have not done it.” – Darin McQuoid, Darin McQuoid Photography, http://www.darinmcquoid.com/superdink.html

“SuperDink is an amazing section of paddling on Dinkey Creek.” – Paul Martzen, American Whitewater, http://www.americanwhitewater.org/content/River/detail/id/3960/

“Now, the slide of SuperDink, which gives the run its fame, is an incredible anomaly that is without a doubt the longest slide I’ve ever run, and is one of the longest slides in the Sierras, somewhere in the quarter mile range.” – Nick Barron, NickyB Kayaking Log, http://kayaknickyb.blogspot.com/2005/11/superdink-high-water.html

“Dinky Creek is up there with my favorite rivers in the world. Ranking in my top 10 classics for sure. Now adding Upper Dink to my hit list I
really love that creek. It's my number 1 recommended run for the Cali season... I will go far enough to say that.” – E.G.,
http://egcreekin.blogspot.com/2009_06_01_archive.html

“Not a lot of class V runs have great spectating. California’s “Super Dink” which is the higher section to the famous multi-day Dinkey Waterfalls is easily accessible from the Dinkey Campground. The lower water levels made the long granite slides a fairly stress free and enjoyable run. While we didn’t know this at the start of the run, we soon found out as ½ of LA seemed to be up for the July 4 holiday while spectating the famous “Infinislide” which is close to ½ mile length!” – CKS Blog, http://blog.coloradokayak.com/2011/07/super-dink-cali-part-1/

Climbers and canyoneers also frequent this segment to explore the glaciated granite canyon and climb the precipitous cliffs and slopes, as well as the granitic massif of Dinkey Dome. We believe that these recreation values are part of the creek's overall outstandingly remarkable diverse recreation opportunities.

Segment 4 – The Forest Service concluded that the described recreation opportunities were not outstandingly remarkable. We disagree. The Forest Service campgrounds, Camp Fresno, and Camp El-O-Win have provided generations of families from Fresno and beyond the region an opportunity to spend quality time along the creek and experience its widely diverse recreational opportunities (camping, picnicking, swimming and wading, hiking, fishing, hunting, photography, and nature study). There are also numerous summer cabins along this segment. The 11.7-mile Dinkey Creek Trail parallels much of this segment, providing access for hikers, backpackers, anglers, swimmers, and mountain bikers. Collectively, these constitute an outstandingly remarkable recreation value.

Segment 5 – Although not as spectacular as Dinkey Creek upstream and downstream, this segment offers to hikers and canyoneers an impressive and narrow gorge, including the deep canyon depression known as Muley Hole. The lower portion of the Dinkey Creek Trail provides access for anglers, hikers, and mountain bikers upstream of Muley Hole. The trail-less segment of the creek from Muley Hole to Ross Crossing was described by a canyoneer as:

“...a classic section and a great trip even without any rappels or major drops. This section of Dinkey is a bit more technical and difficult than any of the sections upstream and significantly less technical than the section immediately downstream. In its own way it is equally as pretty as any other section of Dinkey.” – Paul Martzen, canyoneer and kayaker,

Ross Crossing offers a rare dispersed camping opportunity popular with kayakers preparing to run the lower gorge, as well as with anglers and hunters, and people avoiding the crowds in the more developed recreation area upstream in segment 4.
We believe that these recreation values are part of the creek’s overall outstandingly remarkable diverse recreation opportunities.

Segment 6 – Much of this segment flows through the Sycamore Springs roadless area. The Forest Service’s Wilderness Evaluation of this area documented its diverse recreation values (including whitewater kayaking, canyoneering, hiking, fishing, and hunting) and concluded, “Dinkey Creek provides an outstanding opportunity for challenge and self-reliance for kayakers and canyoneers.” (Wilderness Evaluation, pg. 166)

This is more than confirmed by the opinions of the expert whitewater kayakers who have documented and extolled the whitewater virtues of the lower creek. For example:

“In my opinion, Dinkey Creek encompasses some of the best six miles of kayaking you can find anywhere in the world…” – Laura Farrell, Living the Liquid Lifestyle, http://theliquidlifestyle.blogspot.com/2012/05/dinkey-creek-my-favorite-six-miles-of.html

“The Dinkey Waterfalls is six and half miles of some of the biggest, cleanest and most continuous whitewater found anywhere in the world.” – Joe Ravenna, SMAX Bros. Adventure ON!, http://www.smaxbros.com/2012/dinkey-creek-by-joe-ravenna

“Dinkey Creek is one of the most action packed runs in California...This run is one of the many classics that make California one of the world’s best paddling destinations.” – Dan Simenc, Kayak Diaries, http://www.kayakdiaries.com/2011/08/18/dinkey-creek-waterfalls/

“Everything that you read about the waterfall section of Dinkey is true. The scenery is out of this world, the endless drops are big and clean, separated by big pools, and the canyon is truly amazing. It is a six-mile stretch of whitewater that will put an ear to ear grin on any paddler’s face!” – Dan McCain, NRS – The Duct Tape Diaries, http://community.nrs.com/duct-tape/2015/04/10/big-challenge-on-dinkey-creek/

“This section is now boated each year by expert boaters and is
considered to be an outstanding run. Dinkey has become a favorite for many. Canyoneers will find this section fun and plenty challenging at low flows in the late summer.” – American Whitewater, https://www.americanwhitewater.org/content/River/detail/id/179/

Segment 7 – This short mile segment provides the “take out” for the class V whitewater run upstream, as well as cross-country access for canyoneers and anglers.

**Dinkey Creek – Outstandingly Remarkable Scenic (pgs. 104-105) & Geologic Values (pgs. 105-106) –**

We concur with the Inventory’s assessment that scenic and geological values on segments 1-4 are outstandingly remarkable. We also believe that segments 5-7 share identical scenic and geological values and that the entire creek should be eligible due to these values. The Wilderness Evaluation (pg. 167) confirms outstandingly remarkable scenic values for segment 6 with this statement: “Numerous waterfalls exist on Dinkey and its tributaries in the area, followed by eroded, deep plunge pools. Black Rock, Patterson Bluffs and Indian Rock are highly scenic granite features.”

**Dinkey Creek – Outstandingly Remarkable History, Prehistory, & Cultural Values (pg. 106) –**

We concur that segment 4 has outstandingly remarkable history, prehistory, and cultural values associated with the old Dinkey Creek bridge (listed on the National Registry of Historic Places) and with the prehistoric sites associated with ethnographic Mono Indian trails and villages.

We believe that segments 4-5 possess additional historic values associated with the European emigration into the area, establishment of nearby mining and logging camps, and early development of roads, stores, and cafes to service local workers and public visitors to the McKinley Sequoia Grove.

For thousands of years, Indians followed trails that skirted the granite boulders of Dinkey Creek and connected villages on both sides of Sierra Nevada. The Holkoma Band of the Western Mono tribe spent part of the year near Dinkey Creek, hunting and fishing in the fragrant forest, numerous meadows, and mountain streams.

According to the Upper San Joaquin River Basin Storage Investigation (USJRBSI), the lower reaches of Dinkey Creek were traditional territory of the Wobonuch people, Numic-speaking relatives of the Northfork Mono along the San Joaquin River. The Wobonuch lived in small settlements along larger watercourses. It is likely that Wobonuch people traveled to the headwaters of Dinkey Creek for summer fishing and deer hunting, and for traveling across the Sierra Nevada via Piute Pass. The
Dinkey Creek area has been surveyed for cultural resources in connection with a potential reservoir development by KRCD. In 1981, testing of 18 potentially impacted sites in the area demonstrated substantial occupation of the area as early as 4,000 B.C. Some sites were recommended as eligible for the National Register of Historic Places.\(^3\)

Jedediah Smith and his mountain men passed through the Dinkey Creek area in the late 1820’s, but left little trace. In 1841, John Fremont also led an expedition through the area. In 1863, hunters reportedly named the creek for their dog Dinkey who was injured in a fight with a grizzly bear. In 1878, John Muir mentioned the presence of a grove of giant Sequoias named Dinkey (since renamed McKinley) Grove on Dinkey Creek. Early European emigrants to Dinkey Creek prospected for gold and tungsten and grazed sheep in its streamside meadows. One of the earliest maps of the Sierra Nevada by J.N. LeConte (1903) shows two trails leading east to Dinkey Creek near its confluence with Rock Creek and proceeding to the nearby McKinley Sequoia Grove and beyond.

The giant Sequoia trees of the McKinley Grove began attracting recreational visitors in the early 1900s, which led to the construction of the Dinkey Creek Road and the now historic Dinkey Creek Bridge in 1938. Dinkey Creek soon became a popular recreation destination. Jack Ducey built a resort on Dinkey Creek in 1925, which included a hotel, store, café, and bar. Constructed in the 1930’s, the Dinkey Creek Inn included a store, café, and cabins. Originally established by the Forest Service as a camp for firefighters, Camp Fresno was granted to the city in 1928. Over the past eight decades, the Fresno Family Camp has introduced generations of residents from this Central Valley community to Dinkey Creek. Camp El-O-Win was established in 1958 as a Girl Scout summer camp. The camp is now operated by the non-profit Friends of Camp El-O-Win.

The nearby Pine Logging Camp operated from 1939 to 1979 and employed many members of the Holkoma Band. Single men lived in a bunkhouse while families lived in small cabins. The seasonally operating camp had its own school. Workers from the camp would visit the cafés and bar in Camp Ducey and the Dinkey Creek Inn on weekends.

Additional outstanding prehistory and cultural values are found in segments 1-7. Dinkey Creek segments 1-3 are located in the potential addition to the Dinkey Lakes Wilderness and portions of segments 5-7 are located in the Sycamore Springs roadless area. The Forest Service’s Wilderness Evaluation concludes that both of these areas are “culturally sensitive” and “considered a special interest area from tribes in the area...There are cultural and historic sites adding to the wilderness characteristics of this area by providing important scientific and cultural values.” (pgs. 167, 173).

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\(^3\) USJRBSI Dinkey Creek Reservoir Surface Storage Option Technical Appendix to the Phase 1 Investigation Report, October 2003.
Collectively, this adds up to outstandingly remarkable history, prehistory, and cultural values for Dinkey Creek segments 4-7.

**Dinkey Creek – Outstandingly Remarkable Wildlife & Ecological Values –**

We are particularly alarmed that apparently the Inventory finds no outstandingly remarkable wildlife and ecological values for Dinkey Creek.

From its Wilderness headwaters, Dinkey Creek flows from an elevation of 9,807 feet at Island Lake through meadows, forests, and granite canyons dropping 7,000 feet over 27 miles to the blue oak woodlands of the western Sierra Nevada foothills. The creek transects a broad elevation range in the Sierra Nevada with no reservoirs or diversions and it may be the longest undammed stream entirely within the boundaries of the Sierra National Forest.

The creek flows through diverse habitat as it carves its way downhill, including alpine lakes and meadows, fir and white pine forests, yellow pine forests, chaparral, and oak woodlands. This habitat diversity supports more than 800 plant species (including three rare plants) and four plant communities, as well as the McKinley Grove of Giant Sequoias.

Although the McKinley Grove is just outside the typical ¼ mile river corridor boundary, there is a definite hydrological and historical connection between Dinkey Creek and the Grove that cannot be ignored. The stream system that drains the Grove flows directly downhill into Dinkey Creek. Dinkey Creek recreational opportunities were developed in part because of public interest in visiting the Grove. For these reasons, we recommend that the McKinley Grove be considered as significantly contributing to the outstanding scenic, recreation, ecological, and historical values of Dinkey Creek and that either the McKinley Grove stream be added as a supplemental segment to Dinkey Creek or that the Dinkey Creek corridor be expanded to include the Grove.

Old growth coniferous forests along Dinkey Creek provide important habitat for the Pacific fisher, American martin, and other animals dependent on large trees. The creek's diverse habitat also supports more than 121 species of birds, including the threatened Peregrine Falcon, willow flycatcher, California spotted owl, northern goshawk, great gray owl, and bald eagle. Dinkey Creek provides crucial habitat for the North Fork Kings River deer herd and supports an excellent cold-water trout fishery.

These collectively constitute outstandingly remarkable ecological and wildlife values for all segments of Dinkey Creek.