



# Friends of the White Salmon River

Post Office Box 802  
White Salmon, Washington 98672

friends@friendsofthewhitesalmon.org  
www.friendsofthewhitesalmon.org

May 29, 2020

Ms. Lynn Burditt  
Forest Supervisor  
Columbia River Gorge National Scenic Area  
902 Wasco Street, Suite 200  
Hood River, Oregon 97031  
Submitted to [comments-pacificnorthwest-columbia-river-gorge-nsa@usda.gov](mailto:comments-pacificnorthwest-columbia-river-gorge-nsa@usda.gov)

RE: Public Scoping for proposal to reissue ten-year outfitter and guide special use permits on the White Salmon and Klickitat Rivers

Dear Ms. Burditt,

Friends of the White Salmon River is a local environmental group, established in 1976 and instrumental in the designation of both the upper and lower White Salmon Wild and Scenic segments. We participated fully in the writing of the Management Plan, and we care deeply about the management of the River. We are a mix of raft guides, wildfire scientists, and general environmentalists, with deep roots in both the White Salmon and Klickitat river watersheds.

I am very grateful to Amy Linn for sharing information and supplemental documents last week. I have taken a lot of her time, at a bad time. I hope my comments reflect the additional understanding she provided.

As we understand the scoping letter, perhaps wrongly, we are being offered the opportunity to comment on a preliminary assessment that the re-issuance of outfitter and guide special use permits requires neither an Environmental Assessment (EA) or and Environmental Impact Statement (EIS). Although we have some reservations about this, partly because of some confusion about the statistics about usage, we do basically agree that nothing in this proposal has an impact significant enough to require additional environmental assessment.

However, we ask that you consider and open to public comment some the substance of the actual proposed action. We think that the Proposed Action is not complete and should be revised and reissued for additional public comment on the permit system proposed.

Our comments pertain mostly to the White Salmon River, as it is much more heavily impacted by whitewater recreation. Before we address these substantive issues, we'd like to suggest some editorial changes. Despite the definitions included on the last page of the Proposed Action, we found ourselves quite confused about the terminology regarding permits. It appears, but is not clear in the Proposed Action, that the proposal is to issue or reissue "Special Use Permits", of which there are two types. One is a "Priority Use Permit" issued to commercial outfitters. These would be re-issued to current Priority Use Permit holders. The second is a

“Temporary Use Permit” defined as a “short-term non-renewable” permit for outfitting and guiding use. If this is a correct understanding, we’d suggest that you make this nomenclature clearer in the Proposed Action.

## **1. Whitewater permitting in the context of the Outstandingly Remarkable Values and Management Direction**

It seems self-evident that the permit reissuance should be considered in the context of the management of the River to support and protect all the Outstandingly Remarkable Values (ORV) and in the context of implementing the Management Direction described in the Management Plan.

According to the Management Plan FEIS, (I-5), the designation of the lower White Salmon as a National Scenic River was instantaneous, meaning that ORV studies were not done before designation. After designation, eight major resource categories were analyzed, including geology, hydrology, recreation, resident and anadromous fish, scenic quality, vegetation, wildlife and cultural resources. In the end, five ORV’s were designated: Whitewater Boating, White Salmon River Gorge, Hydrology, Native American Indian Longhouse and Cemetery, and Resident Fish.

Biological Diversity was identified as a strong potential candidate for an OR value (FEIS I-7), but was not selected because there was not time to do the required studies.

Cultural Resources more broadly than the one area identified as an ORV are discussed throughout the FEIS and Management Plan. The longhouse and cemetery area are specifically identified in the FEIS (I-10), but it is clearly stated that other areas are also important. The Management Plan (I-5) includes a detailed discussion of the relationship with the Yakama tribe. This discussion addresses treaty fishing rights and other rights reserved by the tribe in the Treaty of 1855. It also notes (Mgmt. Plan I-6) that “Despite the lack of systematic archaeological fieldwork in the White Salmon River valley, four important Native American Indian sites are known. Any more significant spiritual and prehistoric sites are likely to be present.”

In Section II of the Management Plan, “Management Direction”, Biological Diversity and Cultural Resources are the first and second items mentioned. Both are required to be protected.

In addition, the potential re-introduction of anadromous fish is mentioned both in the FEIS (I-10) and the management plan (I-5). “Reintroduction of anadromous fish into the river above the dam. Although this has the potential to create a new outstandingly remarkable value...it could have effects on existing OR values of resident fish and whitewater recreation. which says “depending on the outcome of the [Condit] relicensing process, this Management Plan may need to be amended or revised to take into account any new conditions which result from the final decision.

We think that Special Use permits should be considered in light of all of the selected ORV’s, in light of Management Direction, and in light of the reintroduction of anadromous fish. Instead, it appears that the main monitoring and research done prior to developing the Proposed Action was the study on boater satisfaction, completed in 2019. While this study is valuable and provides much interesting information, we do not think that boater satisfaction is the only relevant information. Customers may not feel crowded on the river, but do fish?

In summary although we are not going to push at this time for an EA or NEPA, we do strongly urge that the permitting process be revisited and be evaluated in light of the Management Direction. Perhaps a couple of alternatives could be articulated. The primary of these, I would think, is an alternative for a maximum daily limit, especially during spawning season.

## **2. The Proposed Action should be presented in more detail and public comment invited on the substance of the Proposed Action.** We advocate for broader discussion of the specifics of the Proposed Action,

especially in the absence of an EA or NEPA. In the event that the Proposed Action is not released for comment on its content and provisions, we will include some comments here.

- a) The 2014 Operating Plan includes this provision. "VI. RESOURCE PROTECTION. As an authorized permit holder, I recognize my responsibility for the protection of the river's outstandingly remarkable values that include fisheries, whitewater recreation, water quality, the geology of the canyon, and American Indian cultural sites. The public will be allowed to enjoy the river experience as long as the use is consistent with protection of these river values. Provisions made for the river resources protection include" followed by space for the permittee to state what steps they are taking. The statement probably should say "hydrology" instead of water quality, but it is certainly useful to have it in the Operating Plan. In my limited experience, the experienced commercial guides are well-informed on these ORV's. Perhaps some guide training should be required for new guides. I believe River Fest originally started with this purpose. We would like to know what kinds of answers the USFS gets to the question of what provisions are made for resource protection, and we think it's important to evaluate and whether there is more than can be done.
- b) In the interest of controlling traffic on the section of the river below Northwestern Park, and once the USFS is the owner of that site, consider requiring a permit to launch from Northwestern Park for trips on the lower lower segment. I understand that the USFS cannot control boating on that section, but any moderation of traffic on the lower lower, heavily used spawning areas would be a step forward.
- c) Consider including a statement somewhere in the permitting process stating clearly that the Wild & Scenic segment ends at Buck Creek and that the USFS has no management authority outside the W&S segment. This has more to do with clearly defining USFS liability, to avoid potential problems, than anything else.
- d) Consider providing a rack card or pamphlet for outfitters to hand out at the time of trip registration providing basic information about the White Salmon Wild & Scenic designations. We would be happy to brainstorm about the content. Basic facts about the designations of the two sections, extent, nature, and management would be the focus.
- e) The 2019 use study did study traffic patterns and crowding at Husum Falls, and it found that most passengers on commercial trips did not find a problem. However, the study did not look at the portage around BZ falls, and we believe that should definitely be looked at, both in the light of passenger satisfaction and environment impact. There are sometimes long waits there, and it seems likely that customer satisfaction is less. At Husum, customers are mostly in the boats on the river while waiting, listening to their guide, enjoying the location. At BZ, customers are in a line of other people on terrain where it's necessary to watch your step and keep moving.
- f) We suggest that for companies launching above BZ falls there should be trip spacing, and a limit of the number of boats and guests per trip. A suggestion would be no more than 7 boats, roughly 42 passengers. One way to manage this would be by assigning arrival times at the BZ portage, but there are certainly other possibilities as well.
- g) We are also concerned that commercial guests be in appropriate physical condition for the upper rapids and the portage at BZ falls, and to use the alternate put in at BZ corner if they are not ( I'm not sure if USFS has any say in this, but if all companies had a vetting process for rafters, and strived not to take people who should be on the harder rapids, it would streamline the portage and make it easier on everyone else, including the guests who don't know what they are getting into sometimes). In short, we'd like to see some guidance from the USFS on launch times spacing, passenger fitness, and passenger numbers above BZ, to make the river more enjoyable for all.

- h) We think the permitting system should consider the effects on vehicle traffic in Husum. If you're a private boater, fisherman, or someone that wants to view Husum falls there is often no option to park on a weekend during the busy months. The Husum/BZ Council has discussed traffic safety in Husum several times over the years, and there are concerns for both vehicle and pedestrian safety. In addition, Husum is a pinch point for people passing through on their way up or down from Trout Lake, the Gifford Pinchot, and the orchards and businesses above Husum.
- i) Current allocations between companies are perhaps not optimal for the best use of the Wild & Scenic River, based as they are on historical accident and highest usage numbers. Every company has its own unique style of trip. Some are trying to run a quick but pleasant trip while others are really taking their time making the most out of all the features and experiences the river has to offer. Some trips are also more educational than others. River management should work to ensure that passengers will have the opportunity to make the choice of what type of trip they want. If we continue with the present allocation system, awarding high seasonal use, the larger companies, running very efficient trips and able to carry high numbers of customers will continue to grow while the smaller perhaps more educational companies will continue to dissolve.

### 3. Number of Service Days and Season for Permits

- a) The statistical information accompanying the Proposed Action, and in the Proposed Action, needs to be revised and made more useful in evaluating the proposal. I asked for and received additional information, and I also reviewed the 2019 Recreational Use Study and Final Report, but I'm still finding it difficult to assess the potential impact of the proposal on river usage. A complete picture of use – commercial boats, service days, by month and by permittee for at least the last three years would be useful.
  - i. The Proposed Action should clearly spell out how many service days will be permitted. I think that the number of currently permitted service days on the White Salmon is 27,862 plus a priority use pool of 3,313 days accessible to the Priority Use Permit holders, allowing a maximum of 31175 service days in the permit period, currently June 1 – September 15. Is this the proposal for the next ten-year period? Are they allotted for a 10-year period or are they reviewed periodically? Can this number increase?
  - ii. How are the service days allotted between permittees? This, I believe, relies on highest one year or season over the last five years. Does this mean that permittees allotments will change, based on highest use? Numbers were reallocated to permit holders in 2016, based on their utilization rates between 2011 and 2015, apparently rewarding the permittees who carried the most passengers. This does not seem sensible, in the context of the goal to protect all ORV's.
  - iii. The usage chart shows service days / year, with a high of 30,105 annual total for 2018. Clearly then, the annual use is lower than the total use permitted for the season, so the current allotment of service days is not constricting commercial operations. Use is less than permit allowance, in other words, even in the highest year.
  - iv. Statistics also clearly show that the highest use is in August (36%) and July (31%), at least the numbers of commercial boats. These numbers are a clear indication that the usage requirements need to be revisited, to decrease traffic at least in August.
  - v. Information about allocations to each permittee and use by each permittee would be very pertinent and helpful. This can be done without revealing any confidential business information.
- b) We know that the commercial outfitters on these rivers are responsible and take their contractual duties seriously. Still, self-reporting on paper might not be the best way. We would encourage exploration of an electronic data entry system. It would be useful to know, permittee by permittee,

what accounted for the large decrease in 2019, for example. In order to avoid overtaxing USFS employees, electronic instantaneous reporting would be useful.

- c) Better data is needed on the volume and timing of private boaters, especially during seasons critical for fish. The management of whitewater boating needs to be for the benefit of private boaters as well as commercial outfitters. In order to evaluate whether these are significant, data is needed on the number of private boaters on the river.
  - i. Data of private boaters is likely much harder to collect than commercial data, we know, but it is important, and we'd like to see consideration of how best to do this.
  - ii. The Recreational Use Study shows very high overall satisfaction and low perception of crowding, and of course that's great. However, there are some slight but important differences in the private / commercial group results. Again, hard to evaluate this data without having more information on private boaters
  - iii. Many local private boaters are on the river multiple times per week, launching from private sites and in all seasons. This kind of data might be nearly impossible to capture, but it is from members of this group that we have heard perceptions that the river is crowded during certain seasons. It is entirely possible that the experiences of this group are not of high concern in the context of management of a Wild & Scenic river, but the existence of this group should at least be acknowledged. Additional surveys, like the 2019 study, should at least ask private boaters if they are local. Another possibility would be to interview the commercial guides, many of whom are also private boaters.

#### 4. Temporary Use Permits

- a) More information is needed to assess the need for Temporary Use Permits. Many of my individual questions were answered in communications requesting additional information, and thanks for that, but the information in the Proposed Action and published supplement information is somewhat confusing.
- b) The Temporary Use Permit classification raises various questions about public safety. The introduction to the Proposed Action says that the "White Salmon is characterized by Class IV rapids, which are intense and powerful, and require precise boat handling." On the other hand, the Temporary Use Permits are intended for "minor, ancillary, or irregular use often appropriate for youth and educational groups." Are Temporary Use Permit holders subject to any evaluation of qualification? Are Temporary Use permits restricted to certain segments of the River, such as below Husum, where the intensity of rapids is less? Where would Temporary Use Permit trips put in?
- c) Can unpermitted outfitters use the river outside the June 1 – September 15 period?
- d) The definition for Temporary Use Permits says they would be distributed first to applicants who do not hold a priority use permit in that use area, but goes on to say "and thereafter may be distributed to all qualified applicants on a first-come, first-served basis." Can local Priority Use Permit holders apply for and receive these Temporary Use Permits under this "first-come, first-served" clause? If so, we strongly oppose this practice. Special Use permittees should be held to their permitted service days.
- e) Will Temporary Permit holders be required to take out at Northwestern Park?
- f) The scoping letter says that the proposed action includes a "slight expansion of the current temporary use permit system....to help compensate for a reduction in guiding opportunities since the previous permit renewal in 2011." What does reduction in guiding opportunities mean? Why is compensation necessary?
- g) The scoping letter says that one intent of the temporary permit opportunities is "to help curb unauthorized guiding". Proposed Action says "While not a solution to illegal guiding, the availability of temporary use permits can help curb the issue". Is this unauthorized or illegal guiding a problem on the White Salmon as well as on the Klickitat? Documented? What is the size and extent of the problem?

If unauthorized guiding is more of a problem on the Klickitat, then perhaps the number of temporary permits should be increased on the Klickitat and decreased on the White Salmon?

**5. Summary.** We favor a good balance between whitewater use, commercial and private, and protection of fish habitat and other ORV's. For example, as the Yakama begin to exercise their reserved fishing rights, there may be an impact on whitewater use. Then, too, even if not designated as an ORV, anadromous fish can and should be taken into account. Specifically, we support:

- a) Don't reward highest user commercial permittees by providing more service days based on annual or seasonal use.
- b) Have a daily limit on boats and service days/day during critical spawning times, and base these limits on information provided by the agencies in charge of fish restoration, currently Yakama Nation and NOAA.
- c) Limit the number of temporary permits on the White Salmon to 500, but increase them on the Klickitat for specific uses. We understand that there are groups with guiding qualifications who want to use the White Salmon, such as university clubs and veterans' groups, and we do support this use. We support starting with a smaller pool on the White Salmon. We also support changing the language in the Temporary Permit provision to make it clear that Priority Use permittees cannot use the Temporary Permit Service Days.
- d) We leave any decision about shifting the allocation period to fish scientists. It seems like a sensible option to consider.
- e) Any changes, such as daily limits, should be phased in over the next 10-year period. We understand that the commercial rafting companies are friends of the river, love the river, and provide significant economic benefit to the local community. We are not in favor of taking any drastic action that produces immediate negative impacts. We do think, however, that the overall management direction needs to move toward monitoring and protecting all the Outstandingly Remarkable Values.

Thanks for the opportunity to comment.

Very truly yours,



Patricia L. Arnold  
President