

December 28, 2010

National Park Service
Denver Service Center - Chris Church, DSC-P
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

Re: Snake Headwaters CRMP scoping comments

Dear Mr. Church,

The Jackson Hole Conservation Alliance represents some 2,000 members, many of whom live, work and recreate along the newly designated Wild and Scenic Snake River Headwaters.

On behalf of those who use and value these rivers, we submit comments for consideration in the Comprehensive River Management Plan.

The Snake River and its tributaries are a fundamental part of Jackson Hole. Whether responsible for many aspects of the landscape, critical for wildlife abundance and diversity, or as a unique playground for anglers, hunters, backcountry users and recreationists, the Snake River provides a range of opportunities to experience a world seldom encountered anywhere else. The Alliance membership applauds the designation of the Snake River Headwaters as part of the Wild and Scenic Rivers System and the preparation of this Comprehensive River Management Plan (CRMP) to ensure the protection of these remarkable values for the future.

The Alliance believes that the overriding values of this system are the watershed's native wildlife and fish, and the habitats that sustain them. The geologic features, water quality, and free-flowing conditions are components that account for the varied and healthy landscapes that support our incredible wildlife and fisheries, that shape our scenic vistas and provide us with numerous forms of recreation. Ecological integrity is exceedingly rare and is an exemplary value that contributes to each and every Outstandingly Remarkable Value being considered for the Snake Headwaters. Maintaining these native species, their habitats, and the ecological processes that sustain them should be the highest priority of the CRMP. The plan should include strategies for protecting sensitive and threatened and endangered species, and for maintaining and enhancing the diversity of habitats within the river corridor. We encourage all attempts to monitor and enhance the river ecology to keep the intact ecosystem along this corridor.

We recognize that the Craig Thomas Snake Headwaters Legacy Act was a visionary piece of legislation in terms of purpose, size and scope. It was unique in that it took a watershed approach to river protection. In keeping with the spirit of this legislation, the CRMP should strongly encourage the managing agencies (i.e., National Park Service, U.S. Forest Service, U.S. Fish and Wildlife Service) to collaborate in identifying Outstandingly Remarkable Values, quantifying instream flows, and managing various

activities along proximate river segments. Collaboration is critical to the success of all subsequent efforts, and to ensure the protection and viability of the watershed into the future.

Climate change poses a major threat to the hydrologic and ecological integrity of the Snake Headwaters by altering stream flows and allowing non-native species to gain a competitive advantage over native species. The CRMP should address the impacts that climate change is having on designated rivers and their Outstandingly Remarkable Values by incorporating strategies for (1) monitoring the effects of climate change on flows, water temperatures and invasive species; (2) protecting and restoring riparian areas and critical coldwater refugia such as springs that are vital to fish survival and will become even more so; and (3) removing migration barriers so native fish can freely access coldwater habitats.

Every river in the National Wild and Scenic Rivers System must be administered so as to protect and enhance the Outstandingly Remarkable Values that made it eligible for inclusion. The CRMP should maintain traditional forms of low-impact recreation such as rafting, kayaking, camping, fishing and hunting that are consistent with protecting these special values. Further, the plan should make clear that if any new or significantly expanded recreational uses are proposed in the future, and allowing those uses would have a detrimental effect on a river's special values, the managing agencies will err on the side of protecting the special values.

As a result of this management plan process, we expect strong standards and guidelines to accompany the specific descriptions of the ORVs for each segment. The specific criteria used to determine the ORVs for each segment's inclusion in the system should be part of the plan. The plan must also include ways to ensure that those values do not deteriorate, but are protected and enhanced.

The Snake River is an integral part of so many human and wildlife communities, and the values it reflects should receive the utmost care and concern as we craft this management plan.

Thank you.

Sincerely,

Louise Lasley, Public Lands Director
Jackson Hole Conservation Alliance