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Organization: American Whitewater

Title: Pacific Northwest Stewardship Director

Comments: February 19th, 2016

Terri Marceron, Forest Supervisor

Chugach National Forest

161 East 1st Street, Door 8

Anchorage, AK 99501

RE: Revision of the Land Management Plan for the Chugach National Forest,
Alaska

Dear Supervisor Marceron:

Thank you for the opportunity to provide comment on the Notice of Intent to prepare an Environmental Impact Statement¹ and the Proposed Action for the Chugach National Forest Land Management Plan that was recently released for public review.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. With over 5,800 members and 100 locally-based affiliate clubs, we represent the conservation interests of tens of thousands of whitewater enthusiasts across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. We are the primary advocate for the preservation and protection of whitewater rivers throughout the United States, connecting the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within our mission. We have a number of members living in Alaska as well as those who visit the state to enjoy the wild and free-flowing rivers that include those on the Chugach National Forest.

We support the inclusion of all the rivers listed in Table 7 as suitable for inclusion in the National Wild and Scenic River System.² Of these rivers, Sixmile Creek is particularly valued by our membership for its high quality whitewater. While the Twentymile is a more mellow float, it is popular for those looking for a fly-in float trip with relatively simple logistics close to Anchorage. Portage Creek is another popular float trip with simple logistics. While all the rivers are important to our membership, these three rivers are among the most highly valued by our community for their recreational values and we are pleased to see recreation identified as an outstanding feature for all of them. We note that the Kenai River is not included in this list of rivers and we are surprised by this omission given its value for recreation. We request that you consider the addition of this river.

Thank you for the opportunity to provide comment on the Desired Conditions, Standards, and Guidelines for rivers recommended for inclusion in the National Wild

¹ 80 FR 79303 (December 21, 2015)

² Table 7 at Page 46: Chugach National Forest, Proposed Revised Land Management Plan, December 2015.

and Scenic Rivers System (NWSRS). We offer the following specific comments on each:

Desired Conditions

MA 2-DC-01: The special character of rivers recommended for inclusion in the NWSRS is safeguarded, with

recognition of their potential for appropriate but limited use and development. Where river management crosses political boundaries, goals for river protection are developed collaboratively as a result of stakeholder and public participation.

Comment of American Whitewater: We agree with this approach towards collaborative management but the concept should be expanded to make it clear that all outstanding features (aka outstandingly remarkable values) are considered including both ecological (fish and wildlife, geological) and social (e.g. scenery, visual, historic, cultural, and recreation) values. The 2012 Planning Rule recognized that "Ecological and social systems are not confined within NFS unit boundaries. Ecosystem services produced by national forests and grasslands affect and are affected by land management activities on adjacent private, State, local, and other Federal Government lands."³ We support a collaborative approach to river management where rivers cross boundaries. For example, we have had many situations where one access to the river is available on Forest Service land (e.g. a put-in) but another access (e.g. a take-out) is managed by another entity. We propose alternative wording that "goals for protection and enhancement of outstanding features are developed collaboratively." As an alternative we propose, "goals for protection of ecological and social values are developed collaboratively."

MA 2-DC-02: The hydrologic and biological character of stream segments and associated riparian areas having a recommended or designated Wild River status remain in their natural state without evidence of alteration by human activities.

Comment of American Whitewater: We support this desired condition for rivers with a proposed classification of wild.

MA 2-DC-03: The hydrologic and biological character of stream segments with a recommended or designated Scenic River status remains in a largely natural condition with some human-related alteration and impact of existing habitat.

Comment of American Whitewater: We support this desired condition for rivers with a proposed classification of scenic, but recommend further clarification that "some human-related alteration" should be consistent with protection of outstanding features (aka outstandingly remarkable values). We suggest the following modified language: "...with some human-related alteration and impact of existing habitat where such alteration is consistent with protection and enhancement of outstanding features."

3 77 FR 21178 (April 9, 2012)

MA 2-DC-04: The ecological function and processes of designated or recommended Recreational River stream segments are not significantly impaired as a result of human related activities and management.

Comment of American Whitewater: We support this desired condition for rivers with a proposed classification of recreational, but recommend further clarification that management should be consistent with protection of outstanding features (aka outstandingly remarkable values). We suggest the following modified language: "...are not significantly impaired as a result of human related activities and management and management actions are consistent with protection and enhancement of outstanding features."

MA 2-DC-05: Designated or recommended Wild River areas provide opportunities for solitude characterized by few encounters with other users.

Comment of American Whitewater: We support this desired condition for rivers with a proposed classification of wild. If limited entry permit systems are required to meet this management standard, we request an open pool system.

MA 2-DC-06: Roads, camping areas, and trailheads provide the necessary and consistent level of access and use opportunity for designated or recommended Scenic and Recreational River stream segments.

Comment of American Whitewater: We support this desired condition for rivers with a proposed classification of scenic or recreational but believe that "river access sites" should be added to the list.

MA 2-DC-07: Management of designated and recommended Recreational River areas is designed to accommodate a high level of public and recreational use where frequent encounters among users are expected.

Comment of American Whitewater: We support this desired condition for rivers with a proposed classification of recreational.

Proposed Standards

Standard MA 2-ST-01: For designated or recommended Wild and Scenic River areas, vegetation, fish, and wildlife habitat projects shall be restricted to those with a primary purpose of protection and restoration of resources. Projects where the focus is enhancement of naturally occurring and properly functioning habitats shall not be approved.

Comment of American Whitewater: We support this management standard but believe it could be further clarified. Some projects with a goal of restoration could be considered enhancement projects by others.

Standard MA 2-ST-02: For designated or recommended Wild, Scenic, and Recreational River areas, vegetation, fish, and wildlife habitat projects, upon completion, shall visually blend with the surrounding natural setting.

Comment of American Whitewater: We agree with this standard but also believe additional language should be added to clarify that such projects should be designed to protect and enhance the identified outstanding features (aka outstandingly remarkable values). As stated, this standard appears to only address the scenery and visual features.

Standard MA 2-ST-03: For designated or recommended Wild River areas, applications for competitive group events shall not be approved.

Comment of American Whitewater: While we generally agree that competitive events are more appropriate on river segments classified as scenic or recreational, we are concerned that a blanket ban on any events within wild river corridors will limit management flexibility. Alaska has a long tradition of adventure racing and many of our members in the state as well as visitors to the state enjoy these events. We propose alternate language that competitive events should generally be avoided in Wild River areas, but may be permitted where the event does not alter the wild and scenic river characteristics. Further clarification could be provided that approval would be contingent on protection of outstanding features (aka outstandingly remarkable values) and an expectation of few encounters with other users. Such language would be consistent with management guidance in the Forest Service Manual for management of Wild and Scenic Study Rivers that states, "Permit temporary uses when these uses do not alter the wild and scenic river characteristics of land and physical resources or when there is a legitimate fire, insect, disease, or flood emergency."⁴

Standard MA 2-ST-04: For designated or recommended Wild and Scenic River areas, the development of hydroelectric facilities and water and flood control dams that create impoundments shall not be authorized.

Comment of American Whitewater: We strongly support this standard.

Standard MA 2-ST-05: For designated or recommended Wild River areas, construction of new Forest Service

cabins shall not be authorized unless necessary to ensure public health and safety.

Comment of American Whitewater: We support this standard.

Standard Regarding Mining

Comment of American Whitewater: While the standards reference hydropower development, mining is not specifically referenced. We recommend a standard consistent with management of study rivers as outlined in the Forest Service Manual:

4 FSM 2354.21

"Do not recommend leasing with surface occupancy in study areas if the applicant proposes surface disturbance that would adversely affect existing wild and scenic river values or if such disturbance is unavoidable."5

Proposed Guidelines

Guideline MA 2-GL-01: For designated or recommended Scenic and Recreational River areas, Forest Service recreational cabins, campgrounds, boat docks, ramps, lodges, and other facilities should be compatible with desired conditions for scenic and recreation river corridors.

Comment of American Whitewater: We support this guideline.

Guideline MA 2-GL-02: For the purpose of developing an access point to a Wild, Scenic, or Recreation River segment, small areas of non-conformance with the mapped Scenic Integrity Objective, not to exceed two acres, should be allowed.

Comment of American Whitewater: We support this guideline.

Guideline MA 2-GL-03: To protect the free-flowing character or other outstandingly remarkable values of river segments, fire management actions should use MIST.

Comment of American Whitewater: We support this guideline.

Conclusion

Thank you for the opportunity to provide comment on the Notice of Intent to prepare an Environmental Impact Statement and the Proposed Action for the Chugach National Forest Land Management Plan. Please do not hesitate to contact us if any of our comments require additional clarification. Many of these rivers are important to our members and we appreciate that the Chugach National Forest Service has largely recognized their values and proposed desired conditions, standards, and guidelines that will protect these values.

Sincerely,

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

5 FSM 2354.21