

SAR - DEIS - Appendix D

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0034883-001

Our recommendations for adding certain rivers to the Wild and Scenic Rivers System are based on (1) consultation with our members and others who have knowledge of various rivers on the Chugach National Forest, elsewhere in Alaska, in other states, and in other nations; (2) a review of DEIS Vol. II Appendix D-Wild and Scenic Rivers Evaluation; and (3) River Attributes Field Data Sheets prepared by the CNF planning team.

A critique of the Preferred Alternative

We find the Preferred Alternative to be a mediocre response to the opportunity for protecting some of Alaska's finest rivers. It offers only bare-bones representation of the rivers on this forest of remarkable diversity; it uses questionable methodology; it recommends river classifications that would over time degrade the existing natural values of the rivers; and it abandons the standard of one-half mile from each side of a designated river as set forth by Congress in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA).

By calling for the addition of only six rivers (see below) to the Wild and Scenic Rivers System, the Preferred Alternative severely limits representation of the scores of pristine, free-flowing rivers and streams of the diverse landscapes of the Chugach National Forest. In the Preferred Alternative, Sixmile Creek and Snow River would represent Kenai Peninsula rivers; Martin River would represent the Copper River Delta/eastern Copper River Flats; Portage Creek and Twentymile River the mainland portion of the Forest; and the lower Nellie Juan River those rivers flowing into Prince William Sound. This skeletal representation is proposed notwithstanding the planning team's finding that many more representative rivers in the different districts of the forest are eligible for inclusion in the Wild and Scenic Rivers System.

Methodologically, the Preferred Alternative is flawed in two respects. First, it purports to recommend 12 rivers, lakes, and glaciers for addition to the Wild and Scenic Rivers System. This number is reached by dividing Sixmile Creek into two segments, and by splitting up Martin River and Portage Creek into three segments each. Each segment is then proposed as a separate unit of the WSRS. If this segmentation is avoided, the result is six rivers or river-lake systems plus Portage and Columbia glaciers.

Compare this segmentation to the wild and scenic river eligibility determinations made as part of the Revised Tongass Land Use Management Plan. Eligible Tongass rivers are often composed of segments with different classifications, for example a scenic classification given to the lower river and estuary, and a scenic or wild classification to the upper section. But unlike the Preferred Alternative's approach, a segmented Tongass river is considered a single unit when found suitable for inclusion in the WSRS. This is the appropriate way to take into account situations in which segments of a river have different degrees of development and past and present uses. It is not consistent with the Wild and Scenic Rivers Act to separate out segments of a river or river-lake system and propose them as individual units of the WSRS, as is being done in the Preferred Alternative.

Second, the Preferred Alternative pretends that the Columbia and Portage Glaciers are rivers, and duly recommends them for inclusion in the system. However, glaciers are not rivers, by definition, and the Preferred Alternative offers no support for its proposition that glaciers can be considered as rivers under the Wild and Scenic Rivers Act. Merely asserting that they are is not sufficient.

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In any event both glaciers resemble frozen lakes more than they do rivers. Moreover, both are rapidly retreating, that is, backing uphill at a sufficiently remarkable pace to attract the attention of scientists and sightseers. We are confident that there are no rivers, in Alaska or elsewhere, capable of backing uphill, or otherwise behaving as glaciers do. Accordingly, unless the Forest Service can swiftly persuade Congress to create a National Wild and Scenic Glaciers System (Advancing, Stable, Retreating, and Disappeared), we respectfully urge the agency to refrain from recommending lakes of solid ice for inclusion in the national rivers system.

When the problem of segmentation is corrected, and the two glaciers put aside, the Preferred Alternative yields just six recommended rivers: Sixmile/East Fork Sixmile, Martin River, Portage Creek/Lake, Nellie Juan River, Snow River, and Twentymile River.

In recommending classifications for these six rivers, the Preferred Alternative tosses aside the eligibility findings of the Wild and Scenic Rivers Evaluation of Appendix D. Sixmile/East Fork Sixmile is assigned Recreational status, down from Scenic in the Evaluation. Martin River, Snow River and the lake portion of Portage Creek/Lake are dropped from Wild to Scenic. Only Portage Creek retains its Recreational status, while the Nellie Juan River, now cut down to just its lower section, retains its original Wild evaluation.

Should Congress accept the recommendations of the Preferred Alternative, the effect of the less protective proposed classifications is to accept future commercial and other uses that will impair the present outstandingly remarkable values of the rivers in question. This is in direct conflict with the objectives of the WSRS, which is to preserve and enhance the existing natural qualities that qualify these free-flowing rivers and adjacent lands for inclusion in the WSRS.

The Preferred Alternative also abandons the ANILCA standard of one-mile wide river corridors in favor of the half-mile wide corridor applied to WSRS units in the other states. No justification is provided for this reversion to the 'lower 48' standard. The effect of this action is to forgo the opportunity for a higher degree of security for the rivers, their tributaries, and adjacent lands by reducing the buffer of protected acreage to a mere quarter mile on each side of the river.

Lastly, the Preferred Alternative recommends wild river status for only one short stretch one remarkably outstanding river--the Nellie Juan--in the entire forest. This is the remarkably outstanding feature of a Preferred Alternative that is totally lacking in credibility.

Recommended additions to the National Wild and Scenic Rivers System

We recommend the following rivers for potential addition to the Wild and Scenic Rivers System as Wild (W), Scenic (S), or Recreational (R). They represent the Kenai Peninsula, mainland Prince William Sound, and Copper River-Copper River Delta areas of the Chugach National Forest. We further recommend that each river take in one-mile wide corridors pursuant to the standard for Alaska units of the Wild and Scenic Rivers System set forth by Congress in ANILCA.

1. Sixmile Complex composed of Sixmile/East Fork Sixmile (S); Granite Creek (S); Bench Creek and Lake (W); and Canyon Creek (S).

This recommendation is based on the concept of river complex as found in the planning team's evaluation of the Twentymile Complex in Appendix D, pp. 25ff. For the Twentymile, the team properly recognized the need to afford protection to the river system as a whole, its major tributaries as well as the main stem.

In case of the Sixmile Creek system, the Preferred Alternative limits its Scenic designation to the main stem (Sixmile/Sixmile East Fork), thereby leaving major tributaries vulnerable to uses that could degrade these streams and the water quality of

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the main stem.

Our recommendation, by contrast, includes, in addition to Sixmile/Sixmile East Fork, three of its key tributaries: Granite Creek, a swift, clear water stream that offers class II-III whitewater; Bench Creek and Lake, another clear water stream with whitewater comparable to the Sixmile, Sixmile E. Fork; and Canyon Creek, another clear water tributary offering non-stop class III-IV action to intermediate and advanced whitewater boaters.

This unique combination of clear water and whitewater is the basis of our recommendation that the Sixmile system be protected in its entirety. Compared to glacier-fed rivers, clear water rivers offer paddlers and rafters a superior river experience on safety grounds (easier to read the water), usually more diverse fish and wildlife values, and higher aesthetic quality. As a complex composed entirely of clear water components of exceptional clarity and beauty, and outstandingly remarkable whitewater values, the Sixmile Creek system deserves national recognition and protection.

We agree that the Sixmile/Sixmile East Fork, Granite Creek, and Canyon Creek segments do not qualify for wild status because of their proximity to nearby state highways. But leaving these segments exposed to commercial logging and new mining claims, as would be the case under scenic classifications, could lead to the degradation of their existing outstanding natural values and water quality. Thus when Congress considers adding the Sixmile to the Wild and Scenic Rivers System, we will urge it to disallow logging and the location of new mining claims in the three proposed scenic river components of the system.

2. Rivers eligible for wild classification in the Wild and Scenic Rivers Evaluation, Appendix D.

- a. Snow
- b. Twentymile River Complex
- c. Coghill River and Lake
- d. Cascade Creek
- e. Nellie Juan River (entire length) and Lake
- f. Martin River and Lake
- g. Copper River above and below Copper River Bridge
- h. Bering River and Lake
- i. Katalla River
- j. Number 1 River
- k. Russian River

Based on the Evaluations, we concur with the planning team's judgment that these rivers are eligible. The Evaluations also lead us to the conclusion that they are eminently suitable for addition to the Wild and Scenic Rivers System as wild rivers.

3. Other Wild, Scenic and Recreational Rivers as found eligible in Appendix D.

- a. Palmer Creek (S)
- b. Kenai River (R)
- c. Nellie Martin River (S/W)
- d. Alaganik Slough (W) below access road, (S) above access road.

Our recommendation for wild status for Alaganik Slough below the access road recognizes that the Evaluation found this channel of the Copper River eligible for scenic status.

4. Other Rivers not evaluated in Appendix D.

- a. Resurrection River (W). Wild designation for this clear water river would complement existing protection for lands adjacent to the west bank that are in the adjacent Kenai National Wildlife Refuge Wilderness and Kenai Fjords National Park.

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- b. Gravina River (W). We are persuaded by the description provided by the River Attributes Field Data Sheet that the Gravina River deserves wild river status within the Wild and Scenic Rivers System as representative of rivers of the eastern Prince William Sound mainland:

[Gravina River] is not necessarily 'unique' with regards to scenery compared to other mainland rivers and streams in eastern Prince William Sound, but it is a good representation of typical mainland river system for the Sound. Since most of drainage is 'hidden' from view from the Bay, it has a wild, 'surprise,' character. The lower portion is unique or outstandingly remarkable from a recreation standpoint since it provides a kayak portage between Port Fidalgo and Port Gravina. This portage is one of two such portages in eastern Prince William Sound (the other is Canoe Pass which is predominantly saltwater). Entire drainage is National Forest System land so is open to public access. Only accessible by foot via plane or boat from Fidalgo or Gravina. Helicopter could probably land in drainage. Unsure if river is floatable. It appears that most of land along river would be difficult to hike through due to vegetation and watercourses. (Emphasis added.)