

# *Wild & Scenic Rivers*

## *Comment # Comment*

- 0004-005 Designate (at a minimum) the 1,700,000 acres as Wilderness; and all rivers that are eligible should be designated under the Wild and Scenic Rivers Act.
- 0014-001 We are writing to urge that you immediately withdraw the list of rivers that are now on the eligibility" list and that further analysis and consideration be completed before any such list is finalized. There are several reasons to support your taking this action. We realize that once "eligibility" is determined, the next step is to determine "suitability". We also recognize, as does your staff, that during the suitability process many of the streams and rivers will be found to not qualify as W&SRs. However, including, many of the streams that are now on the eligibility list will create tremendous unnecessary burdens for many Alaskans. There is no justification for causing these burdens when there is little likelihood that the streams will be found suitable. For the USFS to include these streams when it knows they will likely be found as not suitable is arbitrary and capricious. The first reason to withdraw the list is that many of the rivers and streams listed are covered by either state, or federal active mining claims. To include these on the list will mean that the USFS will have to manage the areas in the same way as if the designation had already been established by Congress. The requirement then continues until the suitability determination is completed which will be in 1999. This will result in significantly more stringent requirements for the miners. One prime example is that small suction dredges can now obtain a NPDES General Permit (GP) for discharge water through a very simple process that does not cost the small suction dredger. However, if the area is a W&SR Study area and is being considered for "wild" designation, each miner will have to get an Individual Permit (IP) which costs \$500 and requires a 90 day public notice and comment process. The actual process from application to receipt of IP will take at least 150 days. We do not know how many miners will be affected, but this one aspect alone will force many small miners out of business. Where the areas are being considered for "scenic" or "recreational" designation it will be much more difficult, if not impossible, to develop access, settling ponds, bypasses, stockpiles, reclamation, etc.
- 0014-002 A second reason to withdraw the list is that much of the land covered by some of the listed areas is owned by the State of Alaska or by private parties. To include these lands in a federal restrictive designation is asking for conflicts and problems in the future.
- 0014-003 A third reason to withdraw the list is that many of the rivers and streams listed are navigable waterways and are therefore State property to the mean high water level. It is foolhardy to consider such navigable waters for designation. If such areas are designated as W&SR, what you have are two W&SR uplands on either side of the state-owned waterway. This is a sure way to create conflicts and is the current situation in the Fortymile Mining District. In that area we are now (and have been for more than 7 years) in the middle of major conflicts because W&SR designations were created over existing mining claims and other private property. Many "promises" were included in ANILCA to allow reasonable access but these specific promises have been of little value when the individual must fight with the well-financed legal apparatus of American Rivers, et. al.
- 0014-004 Fourth, covering private or state lands and valid existing rights (VERs), including mining claims, in W&SR designations will greatly increase the difficulty of the USFS to manage the affected areas of federal land. Every possible attempt should be made to not include VERs in any such designation, and existence of such VERs should be a strong basis for not including an area.
- 0014-005 Finally, the very act of studying areas in Alaska for addition to any form of conservation system unit (CSU), including Wild & Scenic Rivers, is illegal since the passage of ANILCA. ANILCA stated that there were to be "no more" set asides, unless specifically authorized by the Congress. Studying forests for new land management plans is allowed but studying the forests for inclusion in CSUs is not. Some would argue that only "studies... for the single purpose of considering the establishment..." are prohibited. Such a narrow interpretation would mean that any time a land management plan was being revised, the area could be considered for any of the six or more types of CSU designations. This was clearly not the intent of ANILCA. It is now our understanding that the notice of revision is also a notice of scoping for the EIS that will be written to support the Revision. This is not clear from the notice. Some of these areas have been mined almost continuously up to 100 years. We again urge you to withdraw this list.
- 0019-003 Include as many rivers as possible under the Wild & Scenic Rivers Act.
- 0020-004 4) No inclusion of any river for Wild & Scenic recommendation.
- 0021-001 #1. Absolutely No "Wild & Scenic" Rivers. Too Restrictive.
- 0023-004 -I am in favor of Wild & Scenic River status of all rivers that are/or where they are non-navigable. No damming on any W & SR.
- 0024-004 4) Six mile creek could be designated Wild & Scenic but allow rafters & kayakers.
- 0043-004 All rivers & glaciers identified as potential scenic & wild should be classified as such. None should be taken off of the

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- 0062-006 Protect the 23 rivers/glaciers w/congressional protection under the Wild & Scenic River Act of 1968 - Protect these to the maximum.
- 0146-006 The Forest Service has identified 20 rivers In the Chugach as eligible for inclusion into the National System of Wild and Scenic Rivers. Oppose these classifications as they would diminish multiple use, access and potential mining
- 0154-005 (4) A large number of rivers in the Chugach National Forest have been determined to be eligible for classification as Wild and Scenic Rivers. Such classification does not allow uses which may be far more important to the people of Alaska and the United States.
- 0158-002 I oppose designation of any of the listed rivers.
- 0161-002 I do not support any wild & scenic river designations nor any more restrictions of land use in the Chugach National Forest.
- 0161-004 You're trying to take away the rights of children & their children to utilize the land. Management of land is not only protection. I do not support any wild & scenic river designations nor any more restrictions of land use in the Chugach National Forest.
- 0162-001 The ILLEGIBLE selections look good along with their criteria. I was disappointed not to see the Placer River on the list. The qualities of the Placer are very similar to the twenty mile wild, scenic & recreational visual features. I think that this river consideration is an excellent plan for the Chugach.
- 0164-001 I would like all eligible rivers to be included as wild and scenic rivers. The best outdoor trips I have had have been on ILLEGIBLE and scenic rivers, either designated as such or de facto wild (not yet ruined, dammed, developed or overrun with motorized craft.
- 0165-004 If recommended at all in this plan, new wild and scenic river designations should be recommended very sparingly. Although Congress may not act for many years on any such recommendations, for management purposes such a recommendation can be a de-facto designation, just lacking the act of Congress. The Forest Service needs to be fully aware that by recommending a new wild and scenic river designation within the Forest they may be precluding many other compatible types of multiple uses.
- 0166-002 I feel that all the rivers that qualify for wild and scenic eligibility should receive the appropriate designation.
- 0168-001 These comments are based on contamination provided on Wild & Scenic River Aut. In general I do not support classification of any of the 23 rivers listed as W & SR. Why do it, CNF already controls all activity ILLEGIBLE the forest can approve or disapprove any development activity along rivers. Five of the rivers (Six-Mile, Feast ILLEGIBLE ILLEGIBLE Mile, Canyon Creek, Snow River and Palmer Creek are known to have significant amounts of gold according to USGS and US Bureau of Mines Reports. To classify Columbia Glacier as a wild & scenic river is ILLEGIBLE. There is ILLEGIBLE too much ILLEGIBLE ILLEGIBLE up in federal conservation systems in Alaska. What is this justification to further restrict these river areas? What is the threat?? I do not support this revision to Chugach
- 0169-001 Thank you for transmitting copy of your Revision Document, Volume 3, November 1997, which addresses The Wild & Scenic Rivers Act and some proposals for applying this Act to the Chugach National Forest Rivers. For the Forest Service's information I am unalterable opposed to any wild and scenic River designations within the Chugach Nation Forest System. My inherent decision is predicated upon the FACT that on or about half of Alaska (165 million acres) is already off-limits to road access because of national parks, preserves, refuges, wilderness, wild & scenic river designations, etc. Talk about over-kill!!! I challenge anyone to compare this lock-up with any other state in the nation then ask the individual to be fair with his/her conscience if he/she has one! In my humble opinion, the rabid environmental crazies have no conscience! In this epoch in which we live there IS amply evidence that the American People are fed-up with over-zealous bureaucrats that frequently flaunt the laws of the land in order to regulate private enterprise to their own agenda. It is damned high time that that balderdash stopped!
- 0173-001 I had the pleasure of running the Nellie Juan River last summer. This river is the of the most beautiful I have ever run. Additionally, the river corridor is the wildest I have ever traveled through. The only way to reach the area is by aircraft to Nellie Juan Lake. There is no other means of traveling on the river except by kayak. During our trip we saw no trace of humans except at the very end of the river where there appeared to be a river gauge and drillings in the canyon walls near the gauge. This area is certainly one of the wildest places in Alaska and is unquestionably the wildest place on the Kenai Peninsula. This area/river should be designated wild & scenic!!
- 0174-001 Many thanks for a good newsletter & for keeping us up to date on the forest plan. Wild & Scenic river designation is essential for the eligible rivers & glaciers. Development in Alaska will continue & these areas will be lost to dams, roads, pollution, industry, unless these outstanding & remarkable places are preserved. The exec. dir. of AK Miner's Assn., argument, especially paragraphs five and six are shortsighted & fairly hollow. He should examine the rivers of the NW, of New England, the Everglades to see what happens when development occurs.

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- 0176-001 Alaska already has more than enough waters locked up under "Wild & Scenic" designation. Leave the waters indicated in the "revision" of the Chugach Nat'l Forest Land Mgmt Plan out of the "Wild & Scenic" classification. Someone/some agency currently cares for these waters, and they are doing a fine job. These waters are accessible to the majority of the people in Alaska, and the tourists. No one wants these waters abused, polluted, or mismanaged. Let Americans (the true owners of Nat'l Forest) enjoy the waters through access, facilities, and user-friendly conditions. Let hikers, backpackers, and other "wilderness proponents" use the already designated
- 0180-001 I will address this letter to my river management concerns in the Chugach Planning effort. I hope to address other issues in subsequent letters. I feel hesitant to give you personal background information, but I have elected to do so only to add credibility to my statements. I have canoed, kayaked, and rafted whitewater and flatwater with undying enthusiasm for 25 years. I have worked as a professional guide, taught canoeing and kayaking, and competed in whitewater racing at the national level. I have worked for the USDA Forest Service as a career employee. My tenure with your agency included four years on the Chugach Forest. Currently I work as a Research Wildlife Biologist for another agency. Primary uses of the Alaskan rivers are private river running, commercial rafting, recreational mining, and commercial mining. These I have listed in the order of impacts to the river ecosystem (least to greatest). All of these activities can have a devastating impact; however, the number of users that a river can support in these
- 0180-003 When river use becomes high not only is the system damaged and biological processes impacted but conflicts emerge among the user groups as well as antagonism toward the managing agency. I am sure that you are aware of some of these conflicts that exist on the Chugach and are attempting to deal with them, I hope to make you aware of others that exist now or will occur in the future.
- 0180-004 When demand is high and river use must be managed, access to river resources should not be allocated on an equal basis to each use, because of their differing impacts. I will now discuss the management of individual rivers that are of concern to recreational boaters. Sixmile Creek and East Fork Sixmile Creek is a world class whitewater river. It is well known throughout the international whitewater boating community. Most advanced whitewater boaters that come to Alaska seek out this powerful and difficult run. Scenic designation, under the wild and scenic rivers act, will help protect this river from major impacts in the future; however, this will be insufficient protection from threats that have already occurred. The proposed timber sales in the Sixmile drainage pose the River's greatest threat, and scenic designation will not prevent future logging and road construction. The revised Forest Plan should include specific protection of the Sixmile drainage from timber harvest and road building. Additional concerns are fisheries enhancement projects, mining activities, and expansion of commercial rafting. Fisheries' projects in themselves cause no problems, but if successful they will lead to increased fishing and conflicts among user groups. Kenai river like fishing use and river running are not compatible activities. There currently are conflicts between mining activities and river running activities. Miners alter the river bed, add silt to the river, leave debris and garbage, and create safety hazards when they leave ropes and wires in the river. Their activities need to be monitored more intensively by the Forest Service.
- 0180-006 Canyon Creek is a frequently run whitewater river. Currently there are conflicts between miners and whitewater boaters. Mining activities are creating hazards to navigation that create a safety threat to boaters. Mining activities should be monitored more extensively for compliance with the Code of Federal Regulations. Scenic designation is needed to provide protection of this river from major impacts, but as with Sixmile Creek, additional protection from road building and timber harvest is needed in the forest plan.
- 0180-007 Snow River is a spectacular river that has yet to be run by whitewater boaters. Its scenic values warrant protection as a Wild River.
- 0180-008 Nellie Juan River is an extreme whitewater run. Its difficult whitewater is exacerbated by limited and expensive access, a steep and very remote drainage, harsh weather, and variable flows. This entire drainage deserves Wild River status and full protection from development in the Forest Plan.
- 0180-009 Jackpot River. I hesitate to mention this remote and little known river out of concern of what might be the impact of simply drawing attention to it. This river supports spectacular salmon runs and has great potential as an intermediate whitewater river. I hope these comments have been helpful.
- 0218-006 Management of Kenai River watershed as a special entity to preserve the outstandingly remarkable character as identified in the s & scenic designs but apply that preservation to the entire upper watershed. - Would be interested in any I.D.T. dealing w/waters W & Scenic designation for Canyon Creek should include whitewater also.
- 0236-007 Establishing a System of Wild & Scenic Rivers on the Forest. Things are in a state of limbo.
- 0240-002 Wilderness/wild scenic rivers recommendations commercial exploitation of natural resources at expense of long term stewardship concerns.

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- 0245-001 Insure that the Nellie Juan becomes a wild river - The Nellie Juan River - Wild and scenic designation. I would like to see the Nellie Juan receive wild and scenic status. I have run this river twice and feel it is quite unique and offers an experience that is becoming increasingly difficult to find. It offers a unique type of trip that should be protected and right now there is an opportunity to make that possible by having the Nellie Juan River included in the Chugach National Forest Management Plan as a Wild and Scenic River. The Nellie Juan is also on a list of eligible candidates for Wild and Scenic designation which would give it the protection that it deserves.
- 0264-004 2) STUDY OF WILD & SCENIC RIVERS IS PROHIBITED BY ANILCA
- 0294-008 Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service.
- 0295-002 2. ANILCA -- When Congress enacted the Alaska National Interest Lands Conservation Act it stated that sufficient conservation units had been created and mandated no more studies be conducted for the purpose of establishing new conservation units, except by Congressional direction. This is a clear prohibition against the creation of new wilderness and/or Wild and Scenic Rivers. The Forest Service should not be considering the designation of, or studying the creation of new conservation system units such as new Wilderness areas and Wild & Scenic Rivers in
- 0295-010 9. WILD & SCENIC RIVERS -- Wild & Scenic Rivers are being studied under CLMP. The studies and planning for Wild and Scenic Rivers in the CLMP violate ANILCA Sections 101 and 1326(b). W&SR designations are not needed, and are overly restrictive, and will block access routes across the Forest. Wild and Scenic river management will be very restrictive and will impede economic development, boating and snow-mobiling, and other recreation opportunities in the future. For example the Martin River W&SR corridor blocks access to Chugach Natives land holdings at Carbon
- 0296-005 The identification of 20 Chugach National Forest rivers for inclusion in the National System of Wild and Scenic Rivers clearly asserts a specific-use preference and fails to acknowledge the multiple use mandate. So-called management of this type is short-sighted and irresponsible. Wild and Scenic designation would further impede every preferred activity, from fly-fishing to mining, two activities which can coexist. Identification of all interests, mutual education by interested parties and a negotiated plan are suggested as a means to accommodate sound management of the Chugach National Forest.
- 0301-003 3. Wild and Scenic Rivers: The wild and scenic rivers designations are a blatant attempt to deny a legitimate corporation access to its lands. Non of these rivers need protection nor do they need to be designated as Wild and
- 0303-001 I have lived in Cordova for 19 years, and am raising a family here. I own property on lake Eyak. Hunting and fishing have been a way of life. My concern with this W&SR proposal is that we will not be able to use our rivers and tributaries for transportation to our hunting areas. I am opposed to any more government control over our resources. The forest service seems to be trying to perpetuate its existence by this act. I am concerned for myself now and especially for my children. The reason I live here is for our freedom to come and go and enjoy the freedom we have. I am opposed to any more governmental limitations.
- 0305-003 Designating more wild and scenic rivers is another thing that should not be included in the plan. Alaska has enough wild places and it is not up to the Chugach to provide the nation with any more. Alaska already holds 62% of the nations wilderness. More tourists can appreciate the forest with improved access not by locking up the forest for a select few members of the environmental community. Thank you for allowing me to comment on these issues.
- 0307-001 What rivers, streams, lakes and Glaciers are being spoke of under the section covering "wild and scenic rivers designations". Can you provide us with one of the maps showing us which are involved. We also would like any documents showing or explaining what regulations and restrictions would be involved with this designation for these
- 0308-001 While not a frequent user of the rivers and creeks you have listed I am familiar with about half twenty mile, Portage Lake & Glacier, Kenai River, Russian River, Columbia Glacier, Upper Copper River, Lower Copper, Alaganik Slough, Portage Creek & Palmer Creek. I am in agreement with your choice of these areas and for the designations you gave
- 0313-001 Find all 19 rivers and all 3 glaciers eligible and suitable for wild and scenic status.
- 0314-001 I would like to comment on your Wild & Scenic River selections. It would be nice to see all the rivers you have listed receive the Wild and Scenic designation however if that is not a possibility then I would like to list what I think are the most important. The Nellie Juan, is the very definition of the Wild River designation, "a vestige of primitive America". It possesses outstandingly remarkable scenic, recreational, geologic, and wildlife.

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- 0314-002 But the real opportunity that exists, is to protect the entire watershed and eco-system. The Chugach should buy or swap the land holdings of the Chugach Alaska Native Corporation and protect the entire area that the Nellie Juan flows through. The wilderness experience and qualities that are contained in this area are a rare commodity and in the very near future will be considered as national treasures. Part of the beauty of the Nellie Juan is that it is close to a large percentage of Alaska's population, it is easily accessible by Alaska standards. With a small amount of time and money a person can do a world class wilderness trip. I want to emphasize the wilderness qualities of this area rather than the white water experience, which by the way, is very exciting to say the least. My biggest concern over this issue, is the fear that not enough people know about this river and that it may get overlooked. This would be a tragic waste of an opportunity and an incredible resource. The Nellie Juan will be receiving national attention during the next few months, when it will be featured in several national magazines, Canoe & Kayak Magazine and Outside Magazine. It has also been proposed as a film project for a documentary of a kayak team attempting to run its unexplored sections. So the word will be out in the near future. I have some excellent photographs of this area if that would be of use to the people making the final decisions on this matter. Two other rivers that should have the wild and scenic designation are probably going to be a bit more controversial. East Fork Sixmile Creek and Canyon Creek should be preserved and protected. These rivers are highly utilized by a variety of recreational groups. Some of these users have more detrimental impact than others.
- 0314-004 The wild and scenic designation would seem to solve some of these issues. And since these rivers are the most utilized recreational white water rivers in the state they deserve and demand this protection. It is time to stop the
- 0315-001 I support wild and scenic river status to protect the water of the Chugach. I do not see that providing these rivers with such status as a means to limit access to the average citizen. I participated in helping to have the Alaska Lands Act enacted. As conservationists pointed out it was an attempt to protect whole ecosystems, to avoid the sort of fragmentation we have in the lower 48. Conservation of resources often means to put resources in a sort of trust for the future. But protecting pristine is often pristine land & water values is a means to protect bio-diversity. Human impact can and often has adverse effects on other species, be they plant, animal, etc. Therefore, I support
- 0319-002 We believe that in the long run long-term use of our wild & scenic rivers, our forests, and the wildlife that depend on them for nondestructive uses such as recreation and tourism will reap none economic cultural, spiritual benefits than short-term protect for multinational exploitive, destructive corporations. Our public lands belong to us & they should be enjoyed by us. Designation of wild & scenic ILLEGIBLE as such is essential to the long-term preservation of our wilderness & wildlife we so cherish.
- 0320-001 Protection of rivers from development, in particular Nellie Juan, River Number One, Mountain & Bering, along with lower Copper. My book FAST & COLD describes Nellie Juan & Copper, as well as Kenai & Canyon Ck. The second edition will include Martin & Bering. I would like to call your attention to River #1, which is unique in that it starts in the heart of Columbia Glacier at a lake slightly SE of Great Nunatak, flows through two more lakes and several whitewater segments with portages of two waterfalls to finish at Heather Bay. This river in much of its length is
- 0322-003 To include, at least, 825 streams and glaciers on the Chugach National Forest in the National Wild and Scenic River
- 0332-001 The most recent volume of the Revision newsletter, published by the Chugach National Forest in November, 1997 discussed the Wild and Scenic Rivers Act of 1968. It listed nineteen rivers and three glaciers as being found eligible for inclusion in the National Wild and Scenic Rivers System. Chugach Alaska Corporation is in the process of preparing its comments to be submitted during the current scoping period, which ends on December 31, 1997. In order to timely prepare and submit comments on these Wild and Scenic River eligibility findings I am requesting a copy of all the information used in making the determinations of eligibility of each river and glacier.
- 0333-010 The Forest Service has identified 20 rivers in the Chugach as eligible for inclusion into the National System of Wild and Scenic Rivers. Oppose these classifications as they would diminish multiple use, access and potential mining
- 0334-009 Recommend Wild and Scenic Rivers. Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service.
- 0336-008 The designation of "wild and scenic rivers" is being routinely abused in that the definition instilled in enabling federal legislation was for the designation only to be applied to rivers with "unique and nationally significant values" rather than the "representative examples" apparently being applied by the Forest Service planners on the Chugach National Forest. There are no additional rivers meeting the intent of Congress on the Chugach National Forest and none should be promoted as being such.
- 0337-003 With respect to more "wild" and "scenic" river designations, we need to focus on much more important issues, such as access.
- 0349-001 Wild & Scenic on Lower Copper River & Bering River That the lower Copper River will be over managed We/I make a living out of commercial fishing the lower Copper River
- 0350-005 , wild River Status for Urintina Cr. to Tekel R. on Copper River as trade off for open lower copper

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- 0352-001 Forest Plan Wild & Scenic Rivers More Restrictive. What are we saving them from? There is no access now so how could we use them if they were restricted. Because it is a small part of the large Federal screw that tightens us down w/more regulations. The present use of Copper River - Bering River. Future population in area Future use? The people who use this area. Not so much the citizens from another area who do not know or relate to our WILD land. i.e. some one from Cordova - vs someone from Phoenix or Orlando! Status Quo for Cordova Ranger District Better Public Relations. Local Input.
- 0352-003 Maybe Wild & Scenic River on Copper from Urantaine or to Teikiel River. More use for areas that are accessible. Copper River Wild & Scenic on Area that is inaccessible. Wild River more restrictive but a trade off. Status Quo is less restrictive. Don't lose site of the forest for the trees.
- 0366-001 Like to see Bear Cr withdrawn from Wild & Scenic 5. A. Like to see Bear Cr with Drown from Wild & Scenic
- 0390-001 Look at the areas of that Situation Map that are important to you. 1. Q. What part of the Situation Map is particularly important to you? What issues are involved? 1. A. Wild rivers and their protection 2. Q. What are your specific concerns and interests about these issues? Why are these issues important to you? 2. A. Promotion of several wild rivers as candidates for protection Nellie Juan/River # 1/Bering/Martin
- 0390-002 Q. What other parts and issues of the Chugach National Forest management situation must be considered when designing improvements related to this part of the Situation Map? 3. A. prioritization of river protection as a "highest use" above development 4. Q. What people or views must be considered when designing improvements related to this issue or area? 4. A. I am not sure, but certainly the Martin & Bering are candidates for logging operations. Q. How would you like to be involved as the revision process continues? A. I am available to be a resource providing first-hand knowledge of several rivers which are or should be under consideration for "wild" designation. Nellie Juan, Canyonck, Kenai, River #1, Copper, Martin & Bering. Q. Would you be interested in forming study groups on certain issues? A. Sure, tho I am probably most useful providing complete or draft river guidebook chapters on these
- 0396-001 I will address just 1 topic here. Wild & scenic classification. I have talked to people coming into SRD office concerned about this classification on Snow River. In all cases, the concern has to do with existing use. ATV & Boats go up the south fork at present, DOT has to move gravel out of the main fork during biannual flood events, & there is gravel coming out of Native Corporation land. These uses are likely to continue to be in demand in the future & any designation should keep these needs in mind.
- 0398-005 Wild and Scenic Rivers: The Forest Service has identified 20 rivers in the Chugach as eligible for inclusion into the National System of Wild and Scenic Rivers. RDC opposes these classifications as they are overly restrictive and would diminish multiple use, access and potential mining activity. These single-purpose designations are not needed in the Chugach and could very well be used as a tool to block economic development. The proposed Martin River Wild and Scenic River corridor would block access to land holdings by Chugach Native Corporation in the Carbon
- 0400-009 Wild and Scenic Rivers: All eligible rivers and glaciers (23 total) already identified by the Forest Service should be recommended for "Wild and Scenic" designation. All wild rivers should be managed as wilderness. All Wild and Scenic rivers should be closed to new mineral entry.
- 0403-001 This is a Petition to stop the Wild & Scenic Rivers Act that is Being Proposed for the Chugach National Forest. Some of the reasons are listed below. 1. Bear Creek, Palmer Creek to Sixmile Drainage have some of the longest history of mining & logging in the state. 2. There is already a permit system in place that adequately covers use our National Forest. 3. This act discriminates against everyone who is unable to hike into these areas. 4. More places should be opened, Instead of Closed, to RELIEVE some of the congestion at the few recreational areas in South-Central Alaska. 5. Half of Alaska has already been made inaccessible because of Parks, Preserves, Wilderness, special use & Wild & Scenic Rivers Designations. 6. This act could cripple Hope's Economy. People come to Hope to Gold Mine, snowmachine, use ATV's & just drive around looking at wildlife. 7. There is nothing wild about Hope-Sunrise area, man tamed it a hundred years ago. 8. The National Forest belongs to EVERYONE, not just a few special interest groups. Chugach National Forest should continue to be Designated as Multiple Use.
- 0404-003 Wild and Scenic River designation All 23 rivers, creeks and glaciers inventoried by the USFS, should be formally designated as wild, scenic or recreational (depending on each waterbody's resource values as already identified).
- 0405-006 Recommend for designation all potential wild and scenic rivers already inventoried on the Chugach.
- 0407-004 4.What is the rationale for the proposed nomination of numerous rivers and glaciers for Wild and Scenic status? What are the implications of these nominations in relation to the other intended uses of the forest? How will this affect public access in a forest that has limited physical access at present? Further, aren't these nominations in violation of the intent of Titles I and XIII of ANILCA?

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- 0408-008 WILD AND SCENIC RIVER DESIGNATIONS Twenty Mile, Katalla, and Copper Rivers must retain development potential. Any classifications beyond recreational river status are unwarranted. Access for all forms of access to these rivers must be protected for the majority of user groups. Copper River Railway and the old Katalla River rail have RS2447 status as Alaska State right-of-way conflicting with wild or scenic designations. There should not be a protective status for the Copper River which nullifies Cordova citizen's right to road access. - Snow River, below Snow River Pass, should be designated recreational and above the pass scenic or wild designation. An existing trail to Snow River Pass must be retained. This trail right-of-way conflicts with wild or scenic designation. - Wild and Scenic River designations which lie outside of Wilderness Study Areas should reduce total acreage of the Wilderness Study Areas to equal a no net loss of acreage for multi-use activities and resource development, to include commercial and non-commercial. - Of the 760+ rivers and glaciers in the Chugach National Forest, approximately one third, or 250+ are in Wilderness Study Areas. Having the designation of wilderness gives these glaciers and rivers the protected status sought by additional Wild and Scenic River classifications. Giving the Wild and Scenic status to a river in a wilderness area is redundant. Designation of rivers and glaciers outside of the Wilderness Study Areas creates additional, unwarranted wilderness protection and unjustly prohibits certain user groups. Wild and Scenic River designations go beyond the protection necessary for many of these rivers in Alaska. Over 98% of the Chugach National Forest is roadless. Protection from physical alteration of rivers, such as dams or other construction, are largely unnecessary due to the inaccessibility of these rivers and lack of demand for great amounts of hydroelectric power. Several of the eligible rivers have had extensive resource exploration and some developments that have not hindered their eligibility. Today's emphasis on environmentally sound practices in resource developments are sufficient protection to maintain these rivers continued eligibility for future Wild and Scenic River designations.
- 0420-003 Sir, the Chugach National Forest is a special place and its rivers should be protected as wild & scenic.
- 0421-004 The proposed Wild & Scenic River eligibilities would only act to further curtail access to large portions of the Forest. The number of these river corridors seem excessive when considering language within the Alaska National Interest Lands Conservation Act (ANILCA) that restricts further designations. Many corridors also seem to be based more on strategically intercepting potential access to some areas instead of being based upon actual characteristics of the rivers. Some corridors such as the Nellie Martin, Martin, Bering, and Katalla Rivers are inappropriate since they ignore valid existing access rights (and eventual easements) granted long ago to the Chugach Alaska Corporation.
- 0424-005 Protect the Kenai River and other important rivers as wild & scenic.
- 0425-007 Recommend Wild and Scenic Rivers: Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service. -
- 0427-007 Recommend Wild and Scenic Rivers: Recommend for designation all potential wild and scenic rivers as already
- 0428-006 The Chugach contains many magnificent rivers and streams. We urge the Forest Service to designate all potential wild, scenic, and recreational rivers already inventoried.
- 0431-003 Twenty rivers have been identified as eligible to be nominated as National Wild and Scenic Rivers. Any such designations would decrease the value of the Forest. There are already a large number of designated Wild and Scenic Rivers. None of the rivers within the Chugach National Forest possess characteristics not already protected by existing Wild and Scenic Rivers. Single-use, classifications are detrimental to the Forest, and to the State.
- 0435-001 1) Wild and Scenic Rivers and Wilderness Areas. The Russian River should definitely be wild and scenic. This is the single most important tourist and recreation area in Cooper Landing. The east side of the Russian River should be added to the Wilderness Area that already exists on the west (Refuge) side and should extend upstream from the powerline and eastward enough to protect the drainage. This designation might halt the future of "1872 limestone mining" and other similar bogus activities within the drainage.
- 0438-007 All potential wild and scenic rivers as already inventoried by the Forest Service should be designated as such to receive additional protection.
- 0443-007 As part of the forest revision process the USFS should allow the public to participate in the discussion of which rivers are considered eligible for wild, scenic, and/or recreational river status, in the same way as the public will participate in the discussion of which roadless areas are eligible for wilderness designation. For example, within the greater Turnagain Arm area, upper Winner creek, Seattle Creek, Ingram creek, and Placer River/Skookum creek are of particular concern because none of these is listed as a candidate for wild, scenic or recreational river status-- yet we visit these river valleys and/or the mountain slopes above them frequently and find these drainages worthy of protection for ecological as well as scenic reasons. In addition, they currently provide great opportunities for a range of recreation activities; cross-country skiing, backpacking, bird watching, fishing, and hunting. The Placer River is heavily used by boaters. We think these areas should be considered for wild, scenic, and or recreational status as well as Twentymile/Glacier/Carmen rivers, Sixmile Creek, East Fork Sixmile Creek, Canyon Creek, Palmer creek, etc. On the Kenai Peninsula, the Resurrection River valley and trail is of concern. This area includes fabulous low elevation forest, and a relatively rare long distance backpacking trail-- which when combined with the Resurrection Pass trail provides a unique opportunity on the Kenai Peninsula. Why isn't this river listed as eligible for wild, scenic, and/ or recreational river status? This drainage should be protected.

## ***Comment # Comment***

- 0444-001 MANAGEMENT DIRECTION RECOMMENDATIONS Cumulative Impacts Consider the cumulative impacts of all actions of all adjacent landowners in decisions made by the USFS. Wild and Scenic River designation All 23 rivers, creeks and glaciers inventoried by the USFS should be formally designated as wild, scenic or recreational (depending on each waterbody's resource values as already identified).
- 0445-006 Sixth, I would like to urge that any and all streams that qualify as wild or scenic rivers, or at least the portion of them within the Chugach N.F., if they are not entirely within it, should be studied for such designation, and until a determination is made on such designation, any use that might cause such streams to no longer qualify for such designation should not be permitted.
- 0446-007 7. Wild and Scenic Rivers, No wild & scenic rivers should be considered within the Chugach National Forest. They provide barriers to movement across the forest thereby preventing adequate multiple-use of the Forest. Also see
- 0446-008 8. Wilderness. I oppose any new wilderness designations in the Forest. The forest is large enough that most of it is already wilderness without the designation being placed on it. Existing wilderness areas should be re-evaluated to determine whether the wilderness designation is still appropriate and/or necessary.
- 0448-004 No additional Wild or Scenic Rivers need to be designated in the Chugach at this time. Any Plan should provide for the continuance of the existing uses of the forest with planned expansion of most of those uses in a manner that will allow the activities while preserving the wilderness to the maximum reasonable extent.
- 0449-002 No rivers should be designated as "wild and scenic" within the National system.
- 0450-003 3. Wild & Scenic Rivers: I am in opposition to the inclusion of the 20 rivers proposed for inclusion in the National System of Wild and Scenic Rivers. Classification of these rivers as "Wild and Scenic" will reduce the opportunity for multiple use management by segmenting the forest and fragmenting the transportation system. Rivers classified as "Wild and Scenic" essentially isolate parcels of land and reduce the number of management alternatives available.
- 0451-001 1. Please don't withdraw any streams for wild & scenic that have multiple mining claims on them.
- 0456-007 VI. THE REVISED FOREST PLAN SHOULD NOT INCLUDE NOMINATIONS FOR WILD AND SCENIC RIVERS Wild and scenic river designations under the National Wild and Scenic Rivers Act, are unnecessary in the CNF and should not be included in the revised forest plan. Title I and Title 13 of ANILCA prohibits the Forest Service from taking actions designating new conservation system units in Alaska unless authorized to do so by Congress. Forest Service policy clearly requires nominated rivers to be treated as if they were actually Congressionally designated as Wild and Scenic Rivers. They therefore become de facto conservation systems. Furthermore, the proposed or Suggested wild and scenic river nominations indicated in the scoping documents are fraught with problems. Aside from the facts that they constitute single use designations and in several cases tend to block access that will be important to some people and groups, some of the indicated stream systems clearly do not qualify under the plain terms of the Act. One example is Nellie Martin River on Montague Island. The scoping documents indicate it will be considered for nomination as a "wild" river, the highest of the categories under the Act. This level of designation requires that the river be basically pristine and undisturbed. Yet Nellie Martin River has had a bridge over it and log trucks hauling logs across it (on the bridge) for more that 4 years. It has been heavily visited and fished, and large log harvest areas can be seen from various stretches of the creek. Nellie Martin River no more qualifies for "wild" status than Would Lemon Creek in Juneau or Ward Creek in Ketchikan. If the draft forest plan does include wild and scenic river nominations, the Forest Service should make clear whether it anticipates 1/4 or 1/2 mile buffers, and the allowable cut should be calculated accordingly.
- 0459-002 RIVERS Due to the Forest Management Act and regulatory actions relative to national forest management, rivers receive more than adequate protection with buffer strips, anadromous fish stream protections and current Wild River designations. The CLMP identifies 20 additional rivers which it feels should be included with Wild Rivers designations. We do not feel that these additional classifications should be made for it will only diminish multiple use, access, and potential mineral activity. Simply nominating these rivers for exclusive protection does not preclude the regional Forest Service from choosing to manage the areas for such protection. Essentially, the Chugach National Forest managers are creating and managing for de-facto Wild and Scenic Rivers and restricting public access even without the needed Congressional approval. Implementing such a watershed management regime, or the threat of potential management, should be precluded from this CLMP until Congressional oversight and ratification has been achieved,
- 0463-015 . Wild and Scenic Rivers: All twenty-three rivers which are eligible for wild, scenic or recreational designation under the Wild and Scenic Rivers Act should be addressed fully in the revision process and all should be recommended for the highest level of protection for which they have been found eligible.



## ***Comment # Comment***

- 0464-008 WILD AND SCENIC RIVER DESIGNATIONS: - Over 98% of the Chugach National Forest is roadless. Protection from physical alteration of rivers, such as dams or other construction, are largely unnecessary due to the inaccessibility of these rivers and lack of demand for great amounts of hydroelectric power. Several of the eligible rivers have had extensive resource exploration and development that have not hindered their eligibility. Today's emphasis on environmentally sound practices in resource developments are sufficient protection for all of these rivers. - Twenty Mile, Katalla, Martin, and Copper Rivers must retain development potential. Any classifications beyond recreational river status are unwarranted. Any forms of access to these rivers must be protected for the majority of user groups, never the select few. Copper River Railway and the old Katalla River rail have RS2447 status as Alaska State right-of-way conflicting with wild or scenic designations. There should not be a protective status for the Copper River which nullifies Cordova citizen's right to road access. - Snow River, below Snow River Pass, should be designated recreational. Snow River above Snow River Pass could benefit from scenic or wild designation. An existing trail to Snow River Pass must be retained. - Wild and Scenic River designations which lie outside of Wilderness Study Areas should reduce wilderness managed areas to equal a no net loss of acreage for multi-use activities and the economic resource base. - Of the 760+ rivers and glaciers in the Chugach National Forest, approximately one third, or 250+ are in Wilderness Study Areas. Wilderness management provides these glaciers and rivers the protected status sought by Wild and Scenic River classifications. Giving the Wild and Scenic status to a river in a wilderness area is redundant. - Designation of rivers and glaciers outside of the Wilderness Study Areas creates additional, unwarranted wilderness protection and unjustly prohibits certain user groups. Wild and Scenic River designations go beyond the protection necessary for roadless areas in the Chugach.
- 0465-010 Wild and Scenic River Protection Wild and Scenic Rivers are crucial components of our nation's natural heritage and are essential to maintaining high quality fish and wildlife habitat and diverse recreational opportunities. The Forest Service should consider all rivers previously inventoried in the Chugach for recommendation for designation as Wild and Scenic Rivers. In addition, the Forest Service should update its inventory of rivers for potential inclusion in the Wild and Scenic System and reevaluate any rivers that were previously excluded from recommendation for Wild and
- 0466-001 I found that there serious conflicts in management when Congress designates a river as Wild and Scenic in an area of active or historical mining works. This conflict becomes acute if the river is navigable, and there are claims in the river bed being worked with suction dredges.
- 0466-002 It makes no sense to have such conflicts in management, and it is costly to the federal government to have such conflicts, My comment is that recommendations that a river be designated as wild and scenic should be few in number, and should never be suggested for navigable rivers under possible state ownership.
- 0466-003 I was greatly disappointed in the Revised Tongass Land Management Plan and its recommendations for designations for wild and scenic river status. The first reason I was disappointed was that the U.S. Forest Service designated such a large number of rivers. This is degrading to the concept of a wild and scenic river, that it should be unique and the best of the best. If the Forest Service truly thought all of the rivers suggested in the RTLMP were the best of the best, then the Forest Service does to understand the concept.
- 0466-004 The second reason was that some designations seemed to be used to prevent mining projects. The designation is used as a tool, without regard to whether the river is truly suited to designation.
- 0466-006 Suggested wild and scenic designations will be in violation of the intent of ANILCA sections 101 and 1326(b), but if the Forest Service is compelled to make suggestions they should be few to represent the uniqueness and the best of
- 0466-007 Finally, there should be no suggested designations for navigable waters, or for waters near potential mining, as designations impede access for economic development and result in costly management objective conflicts.
- 0473-010 Rivers that have been inventoried for Wild and Scenic River designation should be designated "wild," unless it fails to meet the criteria now.
- 0475-006 Such designation[wild and scenic river] helps to protect salmon producing systems from the adverse effects associated with logging. These include increased siltation, greater seasonal temperature fluctuations, and the loss
- 0475-007 The Forest Service should recommend for designation all potential rivers within the Chugach.
- 0476-008 Sixth, I would like to urge that any and all streams that qualify as wild or scenic rivers, or at least the portion of them within the Chugach N.F., if they are not entirely within it, should be studied for such designation, and until a determination is made on such designation, any use that might cause such streams to no longer qualify for such designation should not be permitted.

## ***Comment # Comment***

- 0479-029 Wild and Scenic Rivers: The Forest Service has requested comments regarding rivers which are eligible for wild, scenic or recreational designation under the Wild and Scenic Rivers Act. These rivers include: Bear Creek, Sixmile Creek, East Fork Sixmile Creek, Canyon Creek, Snow River, Twentymile River, Palmer Creek, Portage Lake and Glacier, Portage Creek, Kenai River, Russian River, Columbia Glacier, Coghill River, Cascade Creek, Nellie Juan River, Martin Glacier, Martin River & Lake, Alaganic Slough & unnamed tributary, Copper River -- lower (delta complex), Copper River - upper, Bering River & Lake, Katalla River, and Nellie Martin River. TWS wants the Forest Service to address these rivers in the revision process and recommend all of them for the highest level of protection for which they are eligible; for example, the Twentymile and Bering Rivers are eligible for Wild designation, and therefore should be recommended for Wild status, as opposed to downgrading their level of protection to scenic or recreational.
- 0479-030 We feel high levels of protection for rivers is extremely important because rivers provide essential habitat for salmon and other fish species so important to Alaska's economy and recreational values, as well as essential habitat for other wildlife, such as brown and black bears.
- 0480-003 I also support designating as Wild and Scenic all 20 of the rivers which you have identified as eligible. In addition,
- 0480-004 Placer River should designated Wild and Scenic and regulations should be developed such that air boat use is
- 0483-007 categorize all rivers within the Chugach as Wild and Scenic,
- 0485-007 Alaska in general and the Chugach National Forest in particular is blessed with an abundance of beautiful scenery, including wild and scenic rivers. Rivers and the water that they carry are the life blood of all plant and animal wildlife of any forest. It is critical that all recommended rivers within the Chugach National Forest are protected under the Wild And Scenic Rivers Act:
- 0489-007 3. Wild & Scenic designations for all of the 20 or so rivers and glaciers currently identified as eligible in the CNF.
- 0490-009 We have enough wild & Scenic Rivers
- 0491-007 Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service.
- 0492-004 There should be no areas nominated for Wild and Scenic status.
- 0775-009 Recommend all potential wild and scenic rivers to congress for designation.
- 0777-006 Wild and Scenic River Eligibility Determinations The Chugach National Forest has studied close to eight hundred rivers and glaciers in the Chugach National Forest and identified nineteen rivers and three glaciers as meeting the eligibility criteria for inclusion in the National System of Wild and Scenic Rivers. Because Congress did not expressly authorize this single-purpose study, it is inconsistent with ANILCA section 1326(b) and therefore should not be used to support or justify suitability determinations, interim value preservation efforts, classifications to other forms of administrative designation, or to formulate alternatives in the Forest Plan Revision process. The designation of a river or glacier as "Wild and Scenic" creates a "conservation system unit" under ANILCA section 102(4). However, ANILCA sections 101(d) and 1326(b) prohibit the Forest Service from taking actions toward the designation of new conservation system units unless expressly authorized by Congress. Given Congress's clear intent to obviate the need for more conservation system units in Alaska, the Forest Planning Team should not recommend any "Wild and Scenic" designations as part of the Forest Plan revision, particularly when the recommendation will be the product of an unauthorized study. During the scoping workshop held in Cordova on November 22, 1997, a member of the Chugach National Forest Planning Team stated that the Forest Service intends to manage the lands found eligible for inclusion into the Wild and Scenic Rivers System to preserve the values that make it eligible until Congress acts on the Forest Service recommendation. This practice will defeat the intent and purpose of ANILCA section 101(d) because it will effectively create conservation system units without obtaining the necessary congressional approval for those designations. If Forest Service management of a nominated river or glacier will impair public use and access until the designation is approved by Congress, which ANILCA's mandate makes highly unlikely, the Forest Service is creating defacto conservation system units in contravention of the intent and purpose of ANILCA.
- 0777-009 This practice is also inconsistent with the intent and purpose of ANCSA and the 1982 CNI Settlement Agreement, which was to secure for CAC the rights to lands and resources subject only to valid existing rights. The creation of new conservation system units, or de facto conservation system units through interim management practices, will impair or diminish valid rights granted to CAC under ANCSA, ANILCA, and the 1982 CNI Settlement Agreement, particularly when so much of CAC's land is adjacent to or surrounded by lands administered by the Chugach National Forest. For instance, under paragraph 8 of the 1982 CNI Settlement Agreement, CAC was granted a right of access across federal land to the Bering River Coal Fields. Several of the contemplated Wild and Scenic designations would appear to be inconsistent with prior rights granted under ANCSA, ANILCA and the 1982 CNI Settlement Agreement. The Forest Service must avoid protective designations or management practices that fail to acknowledge valid rights granted CAC under ANCSA, ANILCA, and the 1982 CNI Settlement Agreement.
- 0777-019 Nor does the power site classification in place on Nellie Juan Lake and River appear on the planning maps, even though this very lake and river system was found eligible for inclusion into the Wild and Scenic Rivers System.

## ***Comment # Comment***

- 0780-001 I wish to go on record that I do not want the State of Alaska to participate in the Federal Government's Wild & Scenic River Act, especially in the Forest Lands. I do not wish to see any further government control by another program on our rivers or forest. It is my belief that the natural resources of this state should be accessible to the people for development. Also recreational opportunities should be available to all on State and Federal Lands. I feel this program would begin to restrict those opportunities along with commercial opportunities. I feel that this program would further hinder the ability to develop our state by the people of this State in a sound manageable means. I believe in development with planning not restricting. In past dealing with the government agencies governing our timber industry, the different agencies do not work together, there is no common goal and the private individual wishing to develop an industry is mired down in governmental delays, paperwork and studies. I do not wish this to happen with our rivers so why add another program to be managed by a government agency. I do not wish to have our rivers
- 0781-015 Wild & Scenic Rivers: ACE supports the current inventory for Wild, Scenic and Recreational Rivers on the Chugach. We would like to see the following added to the inventory: Placer River, Resurrection Creek and River, Quartz, Creek, Kenai Lake (added to the river), Scott River and Glacier, Rude River, Eyak River and Lake, Ibeck Creek and Slough, Sheridan River, Pete Dahl Slough, Sheep River, Kushtaka Lake, Nichawak River, Campbell River, Edwardes River, Katalla River and Tasnuna River. These inventories are critical, ACE believes, in ensuring that water quality and healthy fisheries are a priority. It is through these designations that a river can be protected from singular uses which may prove, detrimental to broader uses.
- 0783-003 3. Prohibition Against Study for New Conservation System Units - The Alaska National Interest Lands Conservation Act (ANILCA) stated that the need for federal Conservation System Units had been met and it mandated specifically that federal government agencies (including the U.S. Forest Service) were not to even study areas for CSU designation unless specifically authorized by Congress. Congress has not specifically authorized any such study and therefore this Plan cannot include considerations. In addition to prohibiting study for National Parks, Preserves, Monuments, and Refuges, this prohibition covers designations for Wild & Scenic Rivers (W&SRs). It is therefore illegal for the Plan to consider W&SR designations.
- 0783-010 13. Wild & Scenic Rivers - As noted above, it is illegal to even study areas for designation as W&SRs. No W&SRs should be proposed for any stream or river outside the areas to be designated as Wilderness. If W&SRs are considered, which is contrary to ANILCA, the impacts of any W&SR designations must be defined clearly. W&SRs will block access, reduce future management options, restrict public access, etc. and these impacts must be defined in a way that the general public will understand. Case histories of W&SR designations elsewhere in the state and specifically in the Fortymile should be included to show the danger of such designations.
- 0787-011 All possible rivers should be sent to Congress for inclusion as national wild and scenic rivers.
- 0789-001 THE 1968 WILD AND SCENIC RIVERS ACT did much to restore the health and vitality of American rivers in the lower 48 states. Why do we need it now? In the 1970s in Alaska, the majority of potential rivers on federal lands were studied and recommended, a process which limited recreation access and locked into place a complex river management system poorly designed for application and management within the heart of "wild country" where few humans live. 2. Rivers are seekers of the sea which carved valleys and access routes for transportation, recreation and commercial enterprise. Chugach Forest rivers are already managed with a more flexible and creative hand than if they now become designated for generational uses which came out in the 1960 era. Today, too many resource decisions are being made in courts of law because, resource managers find it hard to manage for multiple use needs which arise with the successive generations of forest, wildlife and varieties of human demands. Why impose more legal demands which arise from an outdated and inappropriate system? With sound forest and land management practices already in place on America's second oldest national forest, and with the incredible corridors of wild and scenic rivers already established in 1980 throughout the state, it is a waste of time and money to pursue this old dog. Will one next have to conduct the old NATURAL LANDMARK STUDIES which were once required in the 1960s? A Visitor use and recreation plan can designate a "wild river" here and a "scenic river" there among the Chugach inventory without locking them into federal zones restricting options for tomorrow. A flexible and integrated management system for rivers and watersheds, suited to the uniqueness of each forest system, will best serve the long-range interests of the American Public.
- 0793-005 3. Wild Scenic designations for all of the 20 or so rivers and glaciers currently identified as eligible in the CNF.
- 0794-008 We need to designate or rather, recommend to Congress, that all potential wild, scenic and recreational rivers be designated. We need to protect the Chugach's scenery. It is what draws tourists and Alaskans alike to this land. Logging is not a compatible use for this particular forest. The trees are not very marketable, and the state is better served economically by having a whole, healthy, and unlogged forest. Do not use salvage as an excuse to log either.
- 0798-002 The forest should also look at establishing some Wild and scenic river study areas on some of your rivers.
- 0801-005 5. Wild & Scenic Rivers/Wilderness - Just say No! The Chugach Forest does not need lands reserved for single-purpose uses like Wild & Scenic Rivers or Wilderness. Maintain the Chugach Forest for multiple use and oppose all efforts to designate Wilderness Areas and inclusion of Chugach water-ways in the National System of Wild and Scenic Rivers System. Please include me in any future notices and documents related to this process.  
Best Regards

## ***Comment # Comment***

- 0802-011 Recommend Wild and Scenic Rivers: Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service.
- 0809-002 RIVERS Due to the Forest Management Act and regulatory actions relative to national forest management, rivers receive more than adequate protection with buffer strips, anadromous fish stream protections and current Wild Rivers designations. The CLMP identifies 20 additional rivers which it feels should be included with Wild Rivers designations. We do not feel that these additional classifications should be made for it will only diminish multiple use, access, and potential mineral activity. Simply nominating these rivers for exclusive protection does not preclude the regional Forest Service from choosing to manage the areas for such, protection. Essentially, the Chugach National Forest managers are creating and managing for de-facto Wild and Scenic Rivers and restricting public access even without the needed Congressional approval. Implementing such a watershed management regime, or the threat of potential management, should be precluded from this CLMP until Congressional oversight and ratification has been
- 0810-010 B. Wild and Scenic Rivers: All twenty-three rivers which are eligible for wild, scenic or recreational designation under the Wild and Scenic Rivers Act should be addressed fully in the revision process and all should be recommended for the highest level of protection for which they have been found eligible.
- 0811-005 RIVERS Due to the Forest Management Act and regulatory actions relative to forest management, rivers receive more than adequate protection with buffer strips and current Wild Rivers designations.
- 0811-006 The CLMP identifies 20 additional rivers which it feels should be included with Wild Rivers designations. We do not feel that these additional classifications should be made for it will only diminish multiple use, access and potential mineral activity. Simply nominating these rivers for exclusive protection does not preclude the regional Forest Service from choosing to manage the areas for such protection. Essentially, the Chugach National Forest managers are creating a de-facto Wild and Scenic Rivers and restricting public access even without the needed Congressional
- 0812-006 WILD AND SCENIC RIVER DESIGNATIONS: - Over 98% of the Chugach National Forest is roadless. Protection from physical alteration of rivers, such as dams or other construction, are largely unnecessary due to the inaccessibility of these rivers and lack of demand for great amounts of hydroelectric power. Several of the eligible rivers have had extensive resource exploration and development that have not hindered their eligibility. Today's emphasis on environmentally sound practices in resource developments are sufficient protection for all of these rivers. - Twenty Mile, Katalla, Martin, and Copper Rivers must retain development potential. Any classifications beyond recreational river status are unwarranted. All forms of access to these rivers must be protected for the majority of user groups, never the select few. Copper River Railway and the old Katalla River rail have RS2447 status as Alaska State right-of-way conflicting with wild or scenic designations. There should not be a protective status for the Copper River which nullifies Cordova citizen's right to road access. - Snow River, below Snow River Pass, should be designated recreational. Snow River above Snow River Pass could benefit from scenic or wild designation. An
- 0812-007 - Wild and Scenic River designations which lie outside of Wilderness Study Areas should reduce wilderness managed areas to equal a no net loss of acreage for multi-use activities and the economic resource base. - Of the 760+ rivers and glaciers in the Chugach National Forest, approximately one third, or 250+ are in Wilderness Study Areas. Wilderness management provides these glaciers and rivers the protected status sought by Wild and Scenic River classifications. Giving the Wild and Scenic status to a river in a wilderness area is redundant. - Designation of rivers and glaciers outside of the Wilderness Study Areas creates additional, unwarranted wilderness protection and unjustly prohibits certain user 2 groups. Wild and Scenic River designations go beyond the protection necessary for roadless areas in the Chugach.
- 0813-012 10. Twenty-one rivers and three glaciers have been identified as eligible for inclusion in the Wild and Scenic Rivers System. The proposed designations need to be weighed carefully in light of potential multiple uses, types of tourism, and future access needs. The designations should be based on a careful review of proposed land uses and resource potential. The plan should define the three types of designations under the Wild & Scenic Rivers System (wild, scenic and recreational), and clearly spell out the allowable uses and access for each designation. For example, mining is not allowed within one-quarter mile of a wild river. Other examples would be specific types of tourism operations that would/would not be allowed in each designation such as development of a base camp of operations for rafting or guiding. The plan should also identify the management responsibilities and the relationship of a federally designated wild and scenic river compared to a river defined as navigable by the State of Alaska. Rivers
- 0815-002 Is the ID team going to go ahead with the issue to ask Congress to withdraw Land under the Wild and Scenic Rivers
- 0816-001 Now for my first, concern, it has been advised that the goal of designating land as wild and scenic under the Wild and Scenic Rivers Act, required by guide lines or no, is in violation of the Alaska National Interest Land Conservation Act. This expressly includes the Wild and Scenic Rivers Act. My question is, does the (ID) team intend to spend tax dollars to pursue the issue of withdrawing land under the Wild and Scenic Rivers Act? Pursuant to the Freedom of Information Act, I fully expect an answer to this question in a timely manner.

## ***Comment # Comment***

- 0820-032 Wild & Scenic Rivers: ACE supports the current inventory for Wild, Scenic and Recreational Rivers on the Chugach. We would like to see the following added to the inventory: Placer River, Resurrection Creek and River, Quartz Creek, Kenai Lake (added to the river), Scott River and Glacier, Rude River, Eyak River and Lake, Ibeck Creek and Slough, Sheridan River, Pete Dahl Slough, Sheep River, Kushtaka Lake, Nichawak River, Campbell River, Edwardes River, Katalla River and Tasnuna River. These inventories are critical, ACE believes, in ensuring that water quality and healthy fisheries are a priority. It is through these designations that a river can be protected from singular uses which may prove detrimental to broader uses.
- 0821-008 Sierra Club supports an extensive and representative system of wild and scenic rivers in the Chugach National Forest. Sierra Club requests the Forest Plan recommend the highest possible level of protection for the Chugach National Forest's rivers identified as qualifying for the Wild a Scenic River system including Kenai River, Copper River, Bering River, Katalla River, Martin River, Bear Creek, Sixmile Creek, East Fork Sixmile Creek, Canyon Creek, Snow River, Twentymile River, Palmer Creek, Portage Creek, Russian River, Coghill River, Cascade Creek, Nellie Juan River, Martin Glacier, Martin River & Lake, the Alaganic Slough & unnamed tributary, among others.
- 0821-009 Sierra Club does not believe it is appropriate to designate glaciers as wild and scenic rivers. As glaciers recede and rivers are extended, it is appropriate to evaluate and recommend designation to the "new" river. Perhaps recognition of the current trend of glacier retreat and recommendations for addressing the changes in a protective system is a solution. We are concerned that designating glaciers as "Wild and Scenic Rivers" is merely a cosmetic gesture. What is the rationale for designating glaciers in the W&S River System? We are not aware of any glaciers included in the
- 0827-007 Recommend Wild and Scenic Rivers: Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service.
- 0828-007 7) Recommend for designation all potential wild and scenic rivers already inventoried by the Forest Service.
- 0829-007 Recommend wild and scenic rivers for designation all potential wild and scenic rivers as already inventoried by the forest service.
- 0830-003 WILD AND SCENIC RIVERS. Besides the obvious Nellie Juan River please consider the Gravina and Rude Rivers of Eastern PWS.
- 0837-018 Wild/Scenic Rivers DNR is concerned with the designation of Recreational, Wild and Scenic rivers under the Wild and Scenic Rivers Act, and most particularly, with the "Wild" designation because of the restrictions associated with this classification. With the exception of four streams (Bear Creek, Cascade Creek, Canyon Creek, and Palmer Creek) all of the other rivers/glaciers identified by the USFS seem to fit the "navigability" criteria and the waters thereof are state owned. It is likely that some or many of the 20 streams/glaciers identified by USFS will be dropped as a result of the planning process.
- 0860-092 Wild and scenic river designation for all candidate waterways
- 0881-006 P Will rec. mining be affected by W&SR designation? Sixmile. Where on river?  
P How will W&SRs effect other legal mining operations?
- 0881-015 P NRA designation for Russian River?
- 0890-002 2) Recommend an extensive and representative system of wild and scenic rivers. Establish sufficient riparian, beach and estuarine buffers to ensure that watersheds, in-stream habitats, riparian areas, and other wetlands are not degraded, damaged, or impaired. Prepare watershed analysis, particularly for logging and mining activities.
- 0891-007 7) designate all rivers inventoried as wild and scenic; and
- 0892-008 Recommend Wild and Scenic Rivers: Recommend for designation all potential wild and scenic rivers as already inventoried by the Forest Service.