

## **Stehekin River Corridor Implementation Plan Public Scoping Comment Summary**

The formal public scoping period for the *Stehekin River Corridor Implementation Management Plan Environmental Impact Statement* began in January 2008 and ended on March 31, 2008. During this time, Lake Chelan National Recreation Area held three open house public meetings in Stehekin (January 22, 2008), Wenatchee (January 23, 2008) and Seattle (January 24, 2008). All parties wishing to express concerns or provide information about management issues which should be addressed in the forthcoming conservation planning and environmental impact analysis process were strongly encouraged to submit written comments.

Professional staff was available to introduce the project, give presentations, answer questions, and to accept comments. The public was encouraged to provide comments during the meetings and/or to submit written comments. The meetings were attended by approximately 73 people. There were 84 comments made at the Stehekin Public Meeting by 23 people who signed in, 73 comments made at the Wenatchee Public Meeting by 26 people who signed in, and 69 comments made at the Seattle Public meeting by 24 people who signed in. Approximately 226 comments were recorded on flip charts at these meetings.

Twenty-one public comment letters were also received: 16 from individuals, 3 from non-profit organizations (The Wilderness Society, National Parks Conservation Association, North Cascades Conservation Council, and one from a business (Stehekin River Resort). These were received via PEPC (3 letters), U.S. mail (12), and/or email (6) and fax. Several were received both via email and U.S. mail and one was received via U.S. mail and fax. These public comment letters included approximately 216 comments. One letter was mailed from California, all of the others listed Washington State addresses. Eight letters/emails identified a Stehekin address, two other individuals submitting letters/emails identified themselves as Stehekin property owners.

Comments were submitted directly to the park at the following address; North Cascades National Park Service Complex, Attn: SRCIP-EIS, 810 State Route 20, Sedro-Woolley, WA 98284. Comments were also submitted via the NPS Planning Environment and Public Comment (PEPC) website at [www.parkplanning.nps.gov/NOCA](http://www.parkplanning.nps.gov/NOCA) or sent via e-mail to the superintendent, project manager or [NOCA\\_planning@nps.gov](mailto:NOCA_planning@nps.gov). Information about the planning process was regularly updated and posted on the park's website: [www.nps.gov/noca](http://www.nps.gov/noca) and on PEPC.

### **Summary of Concern Statements**

The public comments from both the meetings and the letters (442 total comments) were sorted into 26 different categories. For each category, similar comments were combined into the following concern statements:

#### Scope of the EIS

- The scope of the plan should include the entire Stehekin River watershed, including wilderness area above High Bridge.
- The plan should not modify the wilderness boundary.
- Plans for the road/trail above High Bridge should be included in the plan.
- Selective tree removal in the upper valley may have an effect on reducing logjams. Plan actions should reduce the potential for the additional formation of logjams.
- The plan should include establishment of the Bridge Creek hiker's hostel.
- Modifications to the River Trail should be included in the plan.
- Relocating campsites or campgrounds should be part of a much larger plan for long-term visitor use in the Stehekin valley.

#### Purpose and Need (3 comments)

- The purpose and need should conform to NEPA and its implementing regulations.

#### Alternatives (6 comments)

- The Alternatives should conform to NEPA and its implementing regulations.
- Alternatives that include heavy-handed manipulation of the Stehekin River are probably not within the scope of the plan.

#### Vision/Philosophy (37 comments)

- The plan should be holistic in its approach and should articulate clear goals and objectives that result in sustainable long-term management strategies.
- The SRCIP should identify and justify its area of potential effects.
- The alternatives should identify a wide range of management strategies to accomplish the purpose and need. Implementation of the alternatives will necessarily include tradeoffs.
- The plan should balance private property protection and fish habitat with respect to the accumulation of large woody debris.
- The plan should include actions that would resolve issues in the whole lower valley.
- The plan should balance the need for resources with effective management strategies that generate them. In doing so, it should involve the Stehekin Community.
- Scientific understanding of the effects of climate change should be applied to determining the vision for management.
- The plan should be comprehensive.
- The plan should identify criteria for valley development and have as its goal allowing for appropriate development while maintaining natural processes.
- The Stehekin Valley and Community were included in the national park system as part of LACH because they are of national significance. Notwithstanding development, the protection of Stehekin resources should be a high priority to preserve for future generations.
- The Stehekin Community is a unique resource recognized by the enabling legislation for LACH.
- The Stehekin River should not be modified to preserve or limit flooding effects on private property.
- There is an inherent conflict between preserving the Stehekin Community and allowing the natural flooding to occur on the Stehekin River.
- The goal of the plan should reflect a long-term balance between allowing natural processes to continue unimpeded and allowing for appropriate sustainable (flood-protected) development, including safe public recreation, facilities and private lands.
- There appears to be a conflict between the erosion control and flood protection actions NPS has taken in the Stehekin Valley and its assertion that it cannot act or expend funding to protect private property.
- Although NPS asserts that the original goal to remove private development from the main valley corridor is no longer valid, actions taken by NPS to protect Company Creek Road appear to be implementing that goal.
- The goal of the plan should be to allow natural processes to occur unimpeded so that natural flooding can continue to occur without regard to its effect on facilities and private property.
- The Stehekin River should be contained within a channel to reduce flooding of private property and public facilities.

#### Alternative Focus (4 comments)

- One alternative should focus on minimal disturbance to natural systems.
- Plan alternatives should focus on climate change, or climate change educational opportunities.
- Plan alternatives should include consideration of rerouting the Company Creek Road.

#### Impact Topics (44 comments)

*Socioeconomic / Cumulative Impacts*

- Land exchanges may affect the value of land in Stehekin or encourage speculation.
- A cumulative effects analysis of previous efforts by NPS and private landowners to install erosion and flood protection measures should be included. These measures have exacerbated the consequences of flooding on private property.
- A comprehensive analysis of the costs of the alternatives, encompassing the cost of purchasing remaining private lands in comparison to continuing to install erosion and flood protection measures should be included.

#### *Impairment*

- The plan should include analysis of impairment and how it is applied.

#### *Land Exchange*

- Development in Stehekin should be clustered to minimize impacts.
- Public and private land use in each alternative should be evaluated to determine its ecological and visitor use consequences.
- Land exchange appraisals should consider the effects of flooding.

#### *Environmental (Natural, Cultural and Social) Impacts*

- A socioeconomic analysis of the impacts of land exchanges and other actions should be conducted.
- Among the impacts that should be included in the environmental impact analysis are the following: terrestrial and/or aquatic habitat loss, alteration, degradation, and fragmentation; indirect effects, particularly stimulated development, human activities, and impacts to wilderness values; cumulative effects to specific resources of concern; impacts to plant and animal species, particularly state and federal listed (e.g. northern spotted owl, bull trout), candidate and other sensitive species; impacts to water quality and/or drinking water; introduction and/or spread of invasive species; cultural, historical impacts, including those pertaining to tribes; hydrological alterations; streambank hardening; loss and/or restoration of riparian areas; recreation and access; safety concerns; and costs.
- The plan should identify the consequences of changing the large woody debris management policy in Stehekin.

#### *Visitor Experience*

- Analysis of the effects of the alternatives on visitor experience should be included.
- Analysis of the effects of the alternatives on recreational use should be included.
- Analysis of the effects of the alternatives on the Stehekin Community should be included.

#### *Natural Resources*

- Analysis of the effects of the alternatives on natural resources (fish, vegetation, wildlife, soils, river hydrology, etc.) should be included.
- The Lower Field should not be considered for exchange due to its adjacency to northern spotted owl habitat.
- There is an apparent conflict between identifying the ecological sensitivity of the Lower Field with respect to northern spotted owls and identifying a proposed Stehekin Valley Road reroute above it. Other existing and potential ecological and human factors, such as fire and noise also have effects on northern spotted owls.
- The use of pesticides should be carefully considered/should not occur near the Stehekin River.
- LACH should use the most effective strategies for treating invasive plants, including comparing the strategies with respect to cost, repeated applications of pesticides, non-chemical means of control, effectiveness/use in other areas, and the effects of pesticides on water and non-target plants and wildlife.
- Volunteer groups should be used in invasive plant management.

*Wild and Scenic River*

- Designate/do not designate the Stehekin River as a Wild and Scenic River.

Large Woody Debris / Sediment (30 comments)

- Selective removal of gravel and large woody debris from the Stehekin River should occur to minimize impacts from flooding. There is an overabundance of these materials in the Stehekin River.
- The plan should determine the origin and need for large woody debris, including its role in the river system and whether the number of logjams is appropriate.
- The plan should determine whether management changes are needed for large woody debris.
- Large woody debris could be used in engineered logjams.
- Logjams should be retained to minimize disruption to the ecosystem.
- Logjams should be removed (in some/all instances) to minimize flooding impacts.
- If large woody debris /gravel is not removed, it will continue to increase and contribute to the formation of logjams and increased impacts from flooding.
- There is a need to understand the origin of the wood in the logjams.
- The plan should determine how large woody debris manipulation could be used to enhance fish and wildlife habitat. Analysis of the need for large woody debris within the river system should occur.
- The amount of large woody debris now in the river is a natural phenomenon and was historically altered so that it is perceived now to be an overabundance.
- Removal of logjams will not fix problems related to flooding.
- The plan should determine the relationship of wood to gravel, especially the consequences of the accumulation of these at the Stehekin River mouth.
- Pile burning generated by the plan should be considered.

Sediment (11 comments)

- Sediment and large woody debris sources above High Bridge/in the whole Stehekin watershed should be identified.
- Road relocation/moving the road and allowing the river to encroach on the former roadway will result in the movement of sediment down-valley.
- Gravel mining may have unintended consequences elsewhere.
- Gravel removal should be used instead of land exchanges.
- Sediment and large woody debris sources above High Bridge/in the whole Stehekin watershed should be evaluated for treatment.
- There is a great deal of suitable gravel for Stehekin projects in the valley that could be used instead of importing materials at high cost.
- Dredging should be part of the plan as long as it is done in a way that minimizes impacts.
- The plan should consider changes to the Sand, Rock and Gravel plan to allow use of gravel generated by plan actions.

Land Exchange (68 comments, plus 6 related to Impacts – see above)

*Land Exchanges: Lower Field*

- Disposition of the Lower Field should be reconsidered. It should be removed from the 1995 LPP list of eligible properties. The Lower Field is northern spotted owl habitat. The Lower Field offers good wildlife viewing opportunities.

*Land Exchanges: Concern about Need for / Desire for NPS Purchase*

- Land purchase and exchanges are the most effective means of allowing the Stehekin River to migrate within its floodplain. Land acquisition is an effective means of allowing the river to migrate naturally.
- The effects of land exchanges on private property should be considered in the plan.
- Before any land is identified for exchange, there should be a survey of the need for additional exchange lands, analysis of the amount of property in the floodplain, analysis of eligibility for FEMA buyout and other factors.
- The emphasis in the plan should be on land purchase, rather than exchange and on strategies to ensure the protection of existing public lands. Land exchanges and easements should be a secondary consideration.
- Public lands should not be exchanged. Exchanging public lands will adversely affect LACH resources. Land exchanges may reward poor decision-making (buying land within the floodplain).
- Land exchanges have a variety of adverse effects, including shifting development to high ground, taking unfair advantage of government resources, encouraging development and speculation, and resulting in increased development.
- Consider the Walker property for land exchange.
- Condemnation of lands should be considered in the L and Protection Plan.
- NPS should seek funding for land acquisition.
- The plan should establish criteria for land exchanges and analyze effects on adjacent lands and values.
- Justification for a revised Land Protection Plan should be included in the plan followed by systematic evaluation of the relative values of public lands identified for exchange. Evaluation should include those lands that might be available for acquisition instead of exchange.
- Land exchanges should/should not occur in the Stehekin Valley.
- There should be a list of available lands for exchange in the plan. Lands adjacent to the private property in Keller's Park should not be on the list.
- The plan should identify whether floodplain lands can be exchanged for lands at higher elevation and whether partial exchanges of flood-affected portions of private property can occur.
- Land exchanges may include covenants/restrictions. Exchanged lands should have the same development rights.
- The plan should include and identify the benefits of clustering development.
- Proposed land acquisitions and exchanges should be evaluated with respect to management viability and access.

*Land Exchanges: Availability*

- There are few lands available for exchange compared to the amount of private land within the floodplain.
- Other strategies (beyond land exchanges) may need to be used in the plan to remove private lands from the floodplain.
- The criteria for evaluating whether to offer public lands for exchange should be revisited, including the aesthetic criteria and whether an entire parcel should be excluded for one criterion.
- Land exchanges should be limited to those lands with low resource or scenic values.

*Land Exchanges: Priority Setting*

- Land exchanges should focus on removing private lands from the floodplain.

- The plan should identify the criteria for prioritizing land exchanges.

#### Jurisdiction (12 comments)

- Land management agencies with responsibility for Stehekin should cooperate in the plan.
- The plan should describe consultation with Native American Tribes.
- The plan should identify jurisdictional responsibility along the Stehekin River, especially at the mouth and with respect to floating or submerged large woody debris.
- The plan should clarify the jurisdiction and management of large woody debris for NPS and private landowners.

#### Policy/Regulation Changes (6 comments)

- The plan should clarify the policy for and management of gravel mining.
- The plan should identify management policies that should be changed.
- Public domain lands (never in private ownership) should be considered for exchange.

#### Potential Modifications to GMP (5 comments)

- The plan should make changes to the management of large woody debris.
- The plan should reaffirm the GMP policy of manipulating large woody debris to minimize recreational boating impacts.
- The plan should clarify how the GMP can be modified.

#### Fisheries Habitat (10 comments)

- The plan should identify the ecological need for large woody debris and how the amount now present relates to that need. Large woody debris should be used for bank protection and erosion control.
- The plan should identify the ecological benefits of large woody debris for fish and fish habitat.
- The plan should identify whether large woody debris left high and dry is beneficial to fish or whether it could be available for use.

#### Floodplain Facilities / Mapping (13 comments)

- The plan should identify options for floodplain mapping, including the advantages and disadvantages of each.
- The plan should take into account the time needed to develop new FEMA floodplain maps.
- New floodplain maps are key to determining sustainable management strategies in the plan.
- The plan should identify what facilities would be allowed to remain in the floodplain and why.
- The plan should evaluate public essential and non-essential facilities in the floodplain and whether they are still needed and should be relocated.
- The plan should identify if there are any structures (other than buildings) that should be removed from the floodplain.

#### Community Principles / Viability (14 comments)

- The plan has the potential to affect the viability of the Stehekin Community if additional private lands are purchased or exchanged. There should be no reduction in the amount of private land within the Stehekin Valley.
- The proposed clustering of development will affect the privacy of landowners who purchased lands away from other developed lands.
- The plan should include actions for supporting sustainable economic activity in Stehekin.

#### Proposed Projects (26 comments)

- The plan should consider what would occur if the Stehekin River changes course at Buckner Orchard.
- The 12 projects identified as potentially needed at the public scoping meetings should be implemented.
- The plan should consider taking a broad look at long-term visitor needs in the Stehekin Valley, including changes to the location or configuration of campgrounds and potential demand for additional low elevation camping.
- The plan should consider implementing work to protect the road/private property north of Mile 5.5.
- Bank Erosion above the Stehekin River Resort should be stabilized.
- 93) The plan should identify opportunities for public-private partnerships on proposed projects.
- The plan should identify removal of gravel and/or large woody debris from the head of the lake to minimize flooding impacts to the river mouth and hazards for recreational boaters.
- The plan should consider taking action near Frog Island [and at the maintenance facility].
- The plan should leave the logjams at McGregor Meadow and No Name Creek in place.
- The plan should include relocation of NPS facilities in the floodplain, including the maintenance yard.
- The plan should identify future problem flooding areas and plan for them before they occur.
- The plan should encourage Chelan County to modify zoning related to floodplain development.
- The plan should identify whether gravel bars can or should be manipulated.
- The plan should consider taking a broad look at long-term visitor needs in the Stehekin Valley, including changes to the location or configuration of campgrounds and potential demand for additional low elevation camping.

#### Erosion Control (8 comments)

- The plan should consider/should avoid additional actions to stabilize the banks of the Stehekin River.
- The placement of large woody debris for erosion protection/flood control can result in downstream effects.
- Adding bank hardening, such as levees, may result in exacerbating the effects of flooding.

#### Road Relocation (27 comments)

- If road relocation threatens private property, that property should be added to the list of those that have the option for land exchange.
- The Stehekin Valley Road should/should not be relocated.
- The plan should identify how private landowners will access their property should the road be relocated.
- Access roads could be minimally constructed/maintained.
- Rerouting the road will affect the stability of properties it is rerouted around.
- Constructing and maintaining rerouted roads will have a wide array of adverse effects.
- Modifications to Company Creek Road need to be considered in the plan.
- Work done on the Company Creek side of the Stehekin River has adversely affected properties on the Stehekin Valley Road side. No comparable work has been done to protect them.

#### Emergency Planning / Landowner Interim Actions (23 comments)

- The plan should address emergency actions landowners can take.
- What criteria define how landowners can treat large woody debris, including floating logs, on their private property? What permits are needed?

- Private landowners can take action to install flood protection measures on their own property. NPS should provide technical assistance to landowners undertaking flood protection measures and emergency actions.
- Agencies have a responsibility to communicate flooding risk to landowners so they can take action.
- Stehekin landowners need an emergency response plan.

#### Agency / Political / Community Involvement and Technical Assistance (9 comments)

- There should be increased involvement of the ACOE, politicians, technical experts and the Stehekin Community in the planning process and its outcomes.
- Technical assistance is needed for Stehekin landowners.
- Educational and interpretive as well as technical information related to flood protection and climate change needs to be more available for Stehekin landowners, residents and the general public.

#### Recreational Use (4 comments)

- The plan should determine the effect of the accumulation and management of large woody debris on recreational uses.
- Effects on the viability of the Lower Valley Trail should be considered in the plan.

#### Water Quality (2 comments)

- Flooding of septic systems has an effect on water quality. Good water quality is important to maintain for the community water system.

#### Research / Climate Change Issues (6 comments)

- The flooding regime on the Stehekin River has been affected by climate change. Future effects are unknown.
- Ongoing effects from climate change need to be projected to the degree possible to aid in planning for the future. Climate change effects need to be considered in the environmental analysis.
- Future impacts and costs associated with climate change should be modeled and predicted in the plan.

#### Restoration (2 comments)

- Restoration of purchased and exchanged lands, as well as abandoned sections of roadway, should occur.

#### Funding the SRCIP (8 comments)

- How will plan implementation be funded? Funding of proposed actions should be identified and addressed.
- The costs of alternatives should be determined.