

From: Peg Faithful

To: United States Forest Service

Re: Proposed Revised Land Management Plan

Date: February 18, 2016

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Thank you for the opportunity to provide comments on the Proposed Revised Land Management Plan. My spouse and I sea kayak in Prince William Sound, and have done so throughout PWS extensively for over 20 years. I am personally familiar with the shoreline of much of PWS.

1. I support wilderness designation for the entire wilderness study area (“WSA”). Unlike the current forest plan, the new plan does not make a recommendation. Is there some reason for this? I urge the USFS to recommend that the entire WSA be designated as a wilderness. The wilderness area should include the EVOS land adjacent to the wilderness study area, even though the subsurface estate is privately owned.

Also, there are areas outside the WSA that should be studied for wilderness classification. Much of the backcountry management area is very similar in character and use to the WSA. This would be areas like Evans, Green, Montague, Hinchinbrook and Hawkins Islands and along Valdez Arm. These areas should be managed as wilderness, and studied for designation as wilderness.

Despite the wilderness management and designation, I am mindful that there is a lot of activity in PWS that might be incompatible with true wilderness. There are commercial and recreational fishing boats, charter, tour and cruise boats, set net sites, hatcheries, etc. I don’t object to these other uses of PWS. They have been present for many years. I assume these uses will continue even if the WSA is designated as a wilderness.

2. Respecting goal 1, ecological sustainability, I suggest the USFS consider imposing hunting restrictions on CNF land, especially in western PWS. Black bears are practically nonexistent in western PWS due to overhunting. Also, there have been a number of abusive hunting activities in western PWS, such as bait stations near beaches and hunters smearing attractants in trees at beaches. The Alaska Board of Fish and Game apparently has no willingness to restrict hunting. For the health of the forest, as well as the experiences of the users (including nonhunters), the USFS should take over management of wildlife on CNF land and restrict hunting to allow wildlife to recover.

3. I was amused at FW-G2-GL-05 on page 33, which specifies that new USFS cabins should not be constructed in bear habitat. This apparently was written by someone

completely unfamiliar with Chugach National Forest. The entire Chugach National Forest is bear habitat. Good luck siting cabins under this restriction.

4. We regularly come across sites, usually hidden to some degree, where people (I assume hunters or recreational or commercial fishermen) have built semi-permanent camps or have cached fuel, fishing gear, boats, etc. There should be a clear standard that this is not permitted and such uses will be obliterated.

5. Regarding nonrecreational temporary camps, FW-G2-ST-10 on page 37. What is this aimed at? I assume it is intended for a work camp to build a fish pass or conduct a bird survey for a month, not a scout troop camping at a beach for a week. This also should apply to commercial recreational camps. This could be clarified. Hardening should consist of boardwalks and platforms (rather than gravel) and they should be removed when the use has concluded. Gravel hardening should require special permission when boardwalks and platforms are not feasible. The tents and structures should use muted colors and, to the extent feasible, should not be visible from the water. Temporary camps should not displace public use of camping beaches, but if camps have to be located at least a quarter-mile from a known camping site or human use area it may be difficult to find a site that has a beach where boats can land for use in connection with the camp. Locating camps 200' from fresh water may not be feasible since streams usually are abundant. Temporary camps should have a portable toilet system (not an outhouse) to remove human waste from the site.

6. Administrative field camps, FW-G2-ST-12 on page 38, should be subject to the same standards as temporary nonrecreational camps. Why would nonrecreational camps be expected to follow LNT practices, but USFS field camps not be? The comments in the preceding paragraph about temporary nonrecreational camps should apply to administrative field camps.

7. A standard under goal 2 should require the USFS, when performing field maintenance, to return the site to its natural condition once the work has been completed. A couple of years ago the USFS performed maintenance on the Shrode Lake trail, and left numerous large slash piles along the trail.

8. In MA1-ST-03 on page 45, certainly it can't mean "recreation." It probably means "recreation events."

9. As I look at map 5, it seems that more of PWS should be classified as primitive rather than semi-primitive nonmotorized. Basically only parts of Nellie Juan and King's Bay and parts of Unakwik Inlet and Wells Bay are primitive. In my experience these areas are not materially different than most of the rest of PWS, except perhaps in the immediate vicinity of Passage Canal (and that land generally is not CNF land, such as Decision Point). Why were these areas classified as they were? My experience is that I can have substantially the same experience in Eaglek Bay (semi-primitive nonmotorized) as I

have in Unakwik Inlet (primitive). I can have substantially the same experience in Derickson Bay (Nellie Juan) (primitive) as I have in Herring Bay (semi-primitive nonmotorized). Eleanor Island is across the water from Naked Island. They are very similar, except one is primitive and the other is semi-primitive nonmotorized. Each of these locations has similar natural beauty, solitude, etc., and has suffered similar degradation and abuse. These classifications don't make sense on the ground.

The significance of these classifications seems to be in tables 3 and 4 on pages 33-34, made applicable by FW-G2-ST-02.

Regarding table 3 "level of encounters on shorelines," the number of parties in sight or sound is completely dependent on the location and size of beaches. If camped at Hobo Bay or several sites in Harriman Fjord (both semi-primitive nonmotorized), there might be several other parties in the immediate vicinity since these beaches are relatively large and well-known and there aren't other nearby beaches. There often are several parties camped at Gaamaak Bay and Dual Head (both primitive), again because of the relative size and location of the beaches. The expectation that other parties not be within sight or sound at all (primitive), or 85% of the time (semi-primitive nonmotorized), is unlikely to be obtainable at these beaches. Same thing re solitude on shorelines. Solitude is high or very high and there are no other parties within sight or sound many places throughout PWS, but solitude is moderate and other parties are in sight or sound in some places in PWS, without regard to the classification as primitive or semi-primitive nonmotorized. These classifications are unrelated to actual experience.

Regarding the "maximum party size," a maximum party size of 15 in the primitive areas and 24 in the semi-primitive nonmotorized areas is way too high. Most beaches in PWS are small. Many can handle parties of only 2-4 persons. A "large" beach can handle a maximum party size of around 8. There are a few very large beaches that can handle larger groups, and some larger groups are especially adept at low impact use. In particular I am thinking of NOLS. Even with a very large beach, if a party of 15 arrives to find that the beach is already occupied by another large party, what will the second party do? Beaches that could accommodate two parties of 15 are very rare in PWS.

Groups larger than 8 should be required to obtain a special use permit. These larger groups typically are guided or organized by someone, rather than being a self-directed group. Requiring a special use permit would enable the USFS to confirm that the group has sufficient knowledge, contingency plans, skills and equipment to locate and use only appropriately large beaches, to limit its impact to beaches that are suitable for a party of that size, to require the use of portable toilets, etc. Fitting 15 people on a beach that can accommodate only 5 or 6 will lead quickly to relatively permanent environmental degradation.

On table 4, I suggest that on-site development in semi-primitive nonmotorized sites be the same as primitive sites. As worded, "primitive campgrounds" could lead to

significant campsite development. I have seen primitive camp sites “developed” with tables, chairs, benches, fire pits, etc. made from driftwood, plywood, etc. These “improvements” really degrade the wilderness or primitive character of the site. If the area is nonmotorized, there is no reason to permit campsite improvements. The USFS typically destroys these sites when it becomes aware of them.

As to trail maintenance, it is completely unrealistic to think that the USFS will annually or biannually maintain all trails in the semi-primitive nonmotorized areas. The USFS has a hard time conducting very sporadic maintenance of well-established trails, such as the trail to Shrode Lake. Most trails in the semi-primitive nonmotorized areas are not maintained. They can be maintained as needed to avoid environmental problems or deal with safety issues.

Access to primitive and semi-primitive nonmotorized areas generally should not be by aircraft. They can be particularly noisy (especially helicopters) and add hazards not presented by motorboats. Motorboats are necessary and historically used since PWS is a maritime climate. Perhaps a few specific sites could be authorized for float planes. Aircraft are not traditionally used for access in PWS.

Overall, I suggest that all areas shown as semi-primitive nonmotorized be reclassified as primitive. I see no reason to classify them as semi-primitive nonmotorized. As noted, they should not be managed differently, and the user experience in each area currently is, and should be, substantially the same.

10. There is a significant problem of persons, I assume mostly recreational power boaters, using chainsaws to cut down trees and branches at beaches, especially along the beach margin. This problem seems to have gotten worse over the past years. Sometimes this is done for firewood, I assume. Frequently it seems to be done for sport (I have seen trees cut and left untouched where they fell) or to “improve” the view. These trees provide wildlife habitat, scenic interest, windbreaks, anchor points, and (as to ghost trees) historical meaning. The Plan should include, as part of its ecological sustainability goal, a desired condition that trees and branches at beaches not be cut down except in the event of emergency or dire circumstances. Appropriate objectives, standards and guidelines to achieve that desired condition then can be developed.

11. As to the WSA management area, I don’t categorically object to personal use timber harvest, which is permitted under table 6. However, I believe this should be done by special use permit. The USFS should issue the permits in a way that disperses these small timber harvests throughout PWS, sites them to take into account visual screening, preserves beaches and other natural resources, deals with disposal of wastes, requires appropriate cleanup, etc. Presumably this will be a very small volume of timber, probably for local use.

12. Table 6 generally permits outfitter/guide assigned sites except in the WSA. These sites should generally be subject to the same standards as apply to nonrecreational temporary camps. In addition, there should be a special use permit required so that the USFS can regulate the dispersion, size and total number of these sites. These sites should not be permitted on beaches regularly used by kayakers and others users. Should there be a process to give public notice before issuing these permits?

13. How does the suitability in table 6 relate to the map 4 classifications? Western Evans Island is semi-primitive nonmotorized in map 5, but is backcountry in map 4. This area is surrounded by the WSA. Table 6 says this area is suitable for saleable minerals (that is, a commercial sand and gravel operation), day use facilities, energy utilities, campgrounds, helicopter landings, recreation events and outfitter/guide assigned sites. These uses seem inconsistent with tables 3 and 4 applicable to semi-primitive nonmotorized areas. On western Evans Island no other parties can be in sight 85% of the time, but a permanent commercial operation (lights, noise, people, etc.) is OK? These standards need to be reconciled. Unfortunately, with the overlapping management schemes associated with maps 4, 5 and 7, it is difficult to understand as to any particular area how that area and nearby areas will be managed. There are multiple overlapping management schemes running in parallel without apparent coordination.

14. Given that the state owns some of the non-USFS land adjacent to the CNF, it seems the Plan should contemplate opportunities for joint or cooperative management of areas. Cooperative management with other private landowners (Native corporations) also should be anticipated and encouraged.

Despite these comments, I want you to know that I value PWS very highly. It is not perfect, but it is pretty close. I appreciate the work the USFS has undertaken over the years to protect and preserve PWS.

Thank you for considering these comments. Please contact me if you have a question about these comments.