

Cascadia Wildlands

we like it wild.

Please consider the following comments on behalf of Cascadia Wildlands regarding the proposed revised Land Management Plan for the Chugach National Forest.

Cascadia Wildlands is a public interest 501(c)(3) nonprofit organization dedicated to conservation of the wildlands of our home bioregion, of which the Chugach represents the far-northern reaches.

I. Resource & Management Plan Vision

We commend the Forest Service for its appreciation of the unique opportunities afforded by the Chugach due to its largely intact, natural state. Of all the management plans our organization has worked on, the Chugach stands out as a crowning jewel. While we have concerns about some aspects of this plan, and some serious fears about the future, the overriding truth is that the Chugach—both in its present ecological condition, and the condition of its management— contains a lot more opportunity than threat.

We strongly encourage agency leadership at the regional and national levels to join the local managers in their appreciation of the profound significance of this place and its opportunities. As the squeaky wheel gets the grease, so too do federal funds and attention tend to drift towards other places that are in a lot worse shape.

Attention should be drawn to two aspects of the vision stated in the draft CLMP in particular: (1) wild salmon, and (2) climate change resilience. We know of no place on earth with better opportunity through its management to influence those interests in a positive way.

As the proposed CLMP correctly states, the presence of abundant wild salmon runs are a defining feature of the Chugach. (Proposed CLMP at 10). It is gratifying to see that the Forest Service has appreciation for the ways that wild salmon act as a sort of keystone from which a vast array of benefits flow: marine-derived nutrients feeding our forest and wildlife, subsistence food, cultural integrity of the region's indigenous peoples, commercial fisheries and jobs, and recreational opportunities.

One feature of the Chugach wild salmon deserves additional focus, and that is the genetic diversity and integrity of different runs. This diversity and integrity is significant for many reasons. Certain particular runs— such as the Eyak blueback sockeyes— have cultural significance. How beautiful is it that an Eyak Native today can catch and eat salmon whose direct ancestors were also harvested and eaten by their own direct ancestors? The wildly successful “Copper River Salmon” branding shows too that the genetic integrity of these runs has a real and quite direct economic benefit. The

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genetic diversity of the salmon runs too is, sadly, a feature that is rare and valuable. The continued viability of salmon in a changing world is a lot more likely because this diversity has endured up to now. Human scientific understanding of the diverse features of these runs remains in its infancy, as does our understanding of which features of salmon might be important to sustaining abundant salmon in the face of poorly understood, but profound, changes occurring the marine ecosystem due to things like climate change and ocean acidification. Different runs eat different things, migrate to different places, behave differently, and have different tolerances for environmental factors. Given how highly uncertain we remain about even the basic factors involved in our changing climate, conserving this genetic diversity is especially important.

As the proposed CLMP also seems to correctly appreciate, conserving the wild Chugach is important to the resilience of ecosystems in the face of global climate change. The biological systems on the Chugach have, we suspect, evolved to be particularly resilient to rapid changes in climate and the marine environment. This must be true, because this area seems historically to have always been subject to very rapid and dramatic changes, such as rapid advance and retreat of glaciers, highly dynamic hydrology, and frequent significant alterations in landforms due to tectonic movements. The people and wildlife of the Chugach have always existed in a world of rapid change, thus far successfully.

Due to its location, the Chugach too is likely to be increasingly important as a sort of biological corridor in which fish, wildlife, and plants can move around and adapt to the changing climate. This intact ecosystem provides room for nature to evolve in response to human-caused climate change. Conservation of that important value should be made explicit in the Forest Plan.

Please consider and evaluate these factors in the EIS. The best available science regarding integrity and diversity of salmon, and the role of the Chugach in resilience in the face of climate change, should be brought to bear. Areas of high uncertainty should not be brushed over, but identified explicitly.

II. Forestwide Direction

We strongly support the emphasis on “resilience” for forest-wide direction. It is worth a pause to appreciate how profoundly more noble and impressive that direction is, compared with the emphasis on so many other National Forests and public lands on one commercial industry or another.

III. Management Area Management Direction

A. MA1 Wilderness Study Area

Cascadia strongly supports designation of Wilderness of the entire Wilderness Study Area. Wilderness management has proven necessary to conserve the forest for recreation, tourism and subsistence. It would be a mistake to eliminate any areas from existing Wilderness management. It would be beneficial to consider additions, in particular in recently de-glaciated areas.

Additional protections clearly are necessary to safeguard against the cumulative effects of recreation and tourism on the WSA. The condition of this area has degraded since the prior Forest Plan revision due to an unchecked explosion of recreational use by hunters and boaters.

In particular, better methods of cooperative management with the State are needed to reign in unsustainable harvest of bear and unchecked increases in access. The Forest Service has relied far too much on the State to manage these things for sustainability. The State will never do this job; certainly never of its own accord. We encourage and support far more strict actions by the Forest Service to proactively address these issues.

B. ANILCA 501(b) Areas

Please consider designating the 501(b) areas as the “Copper River Salmon Reserve.” The benefits of such a designation would be myriad.

It would be beneficial to the congressionally-mandated purpose of these areas under ANILCA to give this area a name—a real English language name. Consider these benefits of even simply naming this area:

- The beneficial marketing effects. “501(b)” sounds more like a computer password than the strikingly beautiful, treasured, protected area that it is. Tourism operators and commercial fishermen in particular could all use the name as a signal to consumers that this area is recognized as something special.
- Beneficial enforcement effects. Local and Alaska residents, many of whom have general contempt for bureaucracy, are unlikely under the “501(b)” designation to even notice that this area is so designated. If they are aware, they are unlikely to have much respect such for an obscure-sounding designation. It *sounds* like a technicality, and so is treated as one. If it were named the “Copper River Delta Salmon Reserve,” then it would trigger the sense of pride these people have for the Copper and for salmon. Nobody but a lawyer could love something called “501(b)” —just about everybody around here loves the Copper River and salmon.

An additional beneficial effect would be that such a name would broaden possibilities for common management actions and cooperation between different agencies and landowners. Precisely because the naming of the area would not involve any congressional action, it would open up the possibility of including adjacent lands and waters under some sort of a common designation.

Integrated management among different land ownership is critical to fulfilling the promise of the 501(b) designation. The ANCSA corporation inholdings and State controlled waters, Bureau of Land Management lands to the east, and National Park Service lands to the north, function as an integrated, interconnected complex, lines on maps notwithstanding. With a “Salmon Reserve” type designation, these different owners would be able to join with the Forest Service under that common umbrella. Such an approach could have special benefits to the ANCSA corporation inholders, because those corporations have unique cultural reasons for preserving ownership of ancestral lands.

IV. Plan Monitoring

There is a pressing need to monitor Forest Plan effectiveness and implementation with regard to wildlife populations.

In particular, black bear populations have been plummeting; Brown bear populations are sensitive and could well be in decline; deer populations are of profound importance for local residents. All are impacted by a sometimes lethal mix of Forest Service and State management, with little to no coordination. Even basic information—such as populations—is typically lacking.

The Forest Service can and should play a greater role in monitoring and management of wildlife populations. The State ADF&G biologists do an excellent job with what they are given, but they are not given nearly enough support. Since the Frank Murkowski era, State of Alaska wildlife management has continuously eroded in quality and quantity. Consumptive use regulations through the Board of Game are invariably more political than scientific. In contrast, the Forest Service is guided by admirable “best available science” standards, and is accountable for rational decision-making.

We would like to see the Forest Service actively monitoring, ideally in collaboration with the ADF&G, the wildlife populations on the Chugach. These wildlife populations are an important part of the vision, goals and objectives of the National Forest for their subsistence, recreation, tourism, and ecological values.

V. Significant Issues to consider in the Forest Plan NEPA document

Cascadia Wildlands takes NEPA compliance very seriously and encourages the agency to embrace the EIS process for the new Forest Plan. NEPA is an excellent way of bringing to bear authentic, meaningful public participation in a context of science-based, objective and accountable government decision-making. The result of a good environmental impact statement, will be a good Forest Plan.

Cumulative Effects of Tourism and Recreation is, by far, the #1 significant issue to consider here. For years and years the agency has been in perpetual limbo attempting to get together a meaningful analysis of the exploding occupation and use of Prince William Sound by people coming through the Whittier tunnel. This author is proud to have twice participated in civil disobedience blocking that tunnel, and it is with dismay that I have watched the worst fears we had then coming true. Recreational users flood the sound in the summer, and frankly many of these users are disgracefully insensitive to the “resilience and sustainability” vision under which the Forest should be managed. Most important to analyzing this issue:

- A reasonable range of alternatives should be prepared, not only to evaluation management options, but to arrive at useful comparisons to discover the likely effects. Please do not bury important factors by simply ignoring the other relevant managers: notably the State of Alaska; the ANCSA corporations; and municipalities and villages such as Cordova, Whittier, Seward and Valdez.
- Reliable information on recreational use, including
 - Numeric data on levels of use, and trends;
 - information on where it occurs, and when;
 - data regarding what recreational activities people are engaged in.
- Thorough analysis (not mere listing) of non-USFS management activities that impact on recreation. Some of the more obvious other activities include:
 - State transportation actions (including the Whittier tunnel and ferry system);
 - Commercial tourism by cruise ships,
 - Commercial tourism by hybrid vessel/land operations (including both consumptive uses like hunting outfitter-guides, as well as eco-tourism operations such as the *Discovery* and the *Auklet*).
 - Municipal recreation and tourism plans, such as the Cordova tourism plan and related marketing efforts (e.g. Cordova markets to birdwatchers, fly fishermen, and hikers; Valdez markets to skiers; Whittier to cruise ship tourists).

- Information related to watchable and huntable wildlife populations, population trends, and their spatial distribution (e.g. Brown and Black bear; wolf; sea mammals).
- Climate change effects, such as dramatically receding glaciers that open up new areas to access, as well as environmental effects (e.g. low snow winters) that change how and where people recreate.
- Economic analysis of the economic impact of recreational use and commercial tourism.

Thank you for thoughtfully considering these comments.

Sincerely,

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