

July 22, 2022

Admiralty Ranger Michael Downs
Admiralty Island National Monument
8510 Back Loop Road
Juneau, AK 99801

Dear Mr. Downs:

I submit the following comments for consideration as how to manage the recently reacquired Cube Cove Lands. Dante asserted that "the road to Hell is paved with good intentions." You need be wary of bringing about a modern twist: "the road to a trammeled wilderness is re-opened by well-meaning biologists."

There are four options as to how to administer the Cube Cove lands:

1) Do nothing but sit on our hands and let nature rewild the place. She's already made a great start with alders exceeding 30 feet in height and choking off the old roads.

2) Do some light targeted restoration efforts with handtools, ideally employing Alaska Native youth from nearby Angoon. The Angoon YCC used handtools under the guidance of our local watershed non-profit to remove a plastic culvert blocking fish passage on a stream last year.

3) Conduct a narrow/targeted restoration effort using motorized/mechanized equipment in a limited fashion. An example of this might be using chainsaws and helicopter sling loads for just a couple of days to remove the creosote logs on the three bridges.

4) Use extensive motorized/mechanized equipment to re-open roads, pull bridges and culverts and scarify road surfaces/create tank traps/close roads again.

1) or 2) are the best options in my mind: 1) upholding untrammeled best; 2) benefiting undeveloped & natural qualities while garnering youth and tribal support for wilderness - a dire need here. The handtool use would be no more trammeling than standard wilderness trail maintenance.

I could be persuaded 3) is acceptable if it is limited to specific one-time instances as I know how harmful creosote is to fish and considering how stressed our salmon runs are.

4) concerns me in terms of biologists using a worst-case scenario (bridge collapse creating fish barrier - a remote possibility in my mind) to subvert untrammeled wilderness administration. I fear 4) will engender a trammeling mindset for Cube Cove lands and potentially other areas. Keep in mind that having untrammeled wilderness areas is rarer than having healthy fish runs - wilderness is supposed to be the one and only designation where we let nature do her thing even if we think we can do better.

Additionally, re-opening roads creates a real possibility for ATV and mountain bike use, no matter how hard you try to close the roads afterward.

In the least, we should adopt an untrammelled approach of doing nothing or using handtools or perhaps removing the creosote logs over a couple days. We should only deal with a fish barrier concern should the risk become much closer to fruition. Then you could use much less trammeling means to restore the flow - explosives, flying in a welder to strategically cut a few sections, maybe using winches to pivot the beams - all far less trammeling than what is currently proposed.

As far as the impact to the undeveloped quality – time and marine air exposure will steadfastly work away at the girders, rusting them away eventually at no expense and with no trammeling. Erosion will wear down the roads. This is rewilding at its best: on nature's time, using natural processes.

Thank you for considering these comments and for keeping wilderness wild.

Sincerely,

Kevin Hood