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Comments: Please see attached file

Terri Marceron, Supervisor

Chugach National Forest

February 16, 2016

Dear Ms. Marceron:

Thank you for the opportunity to comment on the Proposed Chugach National Forest Revised Land Management Plan issued December 2015. I will focus my comments to Prince William Sound, since this is the area I know and love, although my concerns apply in large part to the Copper River Delta and Kenai areas, as well.

I own a state homestead in Jack Bay, near Valdez, which adjoins CNF land that was acquired by CNF under the EVOSTC small parcel acquisition process from the University of Alaska; I worked for nine years to see this difficult land transfer through fruition--from the time I first approached the University to nominate the parcel, through the Nature Conservancy's final intercession to negotiate the transfer from the University to the Forest Service--with the belief that the USFS would be a more responsible and conservation-minded land manager.

In the late 1990's, two friends and I spent twelve days skiing from Valdez to Cordova to meet with District Ranger Cal Baker to discuss expanding helicopter skiing use of the high country in regards to the last Forest Plan revision. Even in this remote, supposedly pristine backcountry, we saw and heard helicopters every clear day, and one landed (illegally) along the Rude River beside us to ask if we wanted a ride into town! It was a memorable, dramatic alpine adventure, but it would be a stretch to call it a wilderness adventure, with helicopters overhead, dropping skiers off and picking them up.

I mention these events as examples of working productively with CNF over twenty five years, usually with a shared goal of protecting the remarkable public lands and resources contained in Prince William Sound. Along with many other Alaskan and local residents who urge you to manage this precious, fragile area with a clear conservation vision and the utmost care, I would draw a distinction between those Alaskans who ask for special privileges that alter and degrade public lands at the expense of the American public, and those of us who ask that you protect insofar as possible in perpetuity the experiences, uses, and pleasures that we are able to enjoy today. As trustees of the public interest in these lands, I urge you to consider this distinction carefully as you attempt to respond to competing requests!

General Comments

While I find plenty to commend in this Proposed Revision, I must say that I am also deeply disappointed that planners have not shown the clear, strong conservation vision that is essential for Prince William Sound not to be loved- and used to death-not a literal death, for it's easy to envision a still lovely but depleted future PWS, replete with multiple uses, overuses, and abuse-but a figurative demise wherein the landscape, wildlife and distinctive uses we now enjoy grow incrementally more and more a shadow of their former glory with every passing Forest Plan revision.

While the words "sustainable" and "sustainably" are used throughout the document, my sense is that there is too little awareness or realism employed in the plan's effort to be all things to all people. Although it is possible to

have multiple sustainable uses of the forest, to do so it is essential to prioritize conserving the ecological integrity and wilderness values that underpin all subsidiary uses. Only then is it possible to select those uses that are compatible with these underlying, foundational qualities, as well as levels of use that are, indeed, sustainable. Sustainable does not mean "sustained trajectory of deterioration," the inescapable consequence of the current Plan revision.

Some National Forests are managed primarily for timber or grazing, or other non-recreational goals. Chugach National Forest remains an exceptional wilderness recreation public land--arguably the finest in our nation--and should be managed to retain these qualities as intact as possible. This does not preclude multiple uses or economic benefits, but in order for these to be realized without steadily eroding the source of what attracts us to PWS, clear priorities must be established. This plan does not adequately identify the CNF's distinctive role in the National Forest System or how the proposed management plan will support that role. I find this particularly disturbing, because without this recognition as a first step, the Plan elides CNF's responsibility to protect these qualities for the American people, choosing instead to be swayed by incompatible competing claims for more access, more visitation, more economic development, etc. Cloaked in "multiple use" language, the current Plan offers too many concessions, too little conservation.

Excessively consumptive and conflicting uses, such as wilderness value on one hand and commercial tourism, mineral extraction, or logging are often far from sustainable, in that they alter--strongly alter over time--existing conditions. The rare, fragile emergent properties of wildness, solitude, ecological integrity, wilderness travel, and so many other fine existing qualities that are present today (diminished, but still extant) are targeted for erosion by multiple non-sustainable uses, economic growth, increased visitation, and consumptive uses. This is not necessary, and I see it as a capitulation by the USFS to special interests.

Specific Comments

1. The existing Wilderness Study Areas recommended for full protection as congressionally designated Wilderness have been reduced from nearly 2,000,000 acres by roughly one third, including premier de facto wildlands that should receive more protection, not less, as under the current plan.

Glacier Island and the entire watershed of the Columbia Glacier are particularly important to me, as they are to many visitors to CNF by boat from Valdez. This area should remain under management to preserve existing wilderness character, and should be recommended for Wilderness designation. Glacier Island is among my favorite "short excursion" destinations, whether by kayak from our homestead, one day away, or by sailboat. This fall, pushed north from Montague Island by storms and excessive hunting pressure from a liveaboard hunting operation, I was able to take a nice buck on Glacier to partially fill an empty freezer. It is a favorite of the general public, subsistence hunters from Tatitlek, and commercial tourboat and kayak guides. It is at risk of being over-appreciated, but its exceptional scenic and recreational qualities deserve careful management and protection. It should remain managed as potential future wilderness (i.e., as a WSA).

Knight Island, rather than being withdrawn from the WSA, should receive strong attention for vacating Chugach Alaska Corporation holdings that compromise an exceptional island. In fact, when many of us think of Prince William Sound, we think of Knight Island! Knight Island is a central, scenically compelling wonder among PWS's major islands. Its dramatic skyline of craggy peaks beckons from as far off as Valdez Arm, and it affords many secure and enchanting anchorages, wonderful kayaking, hiking, peak bagging, and fishing.

I understand the impetus to withdraw Knight Island from the WSA, due to the conflicts of managing lands adjacent to Chugach Alaska Corporation's mineralized lands. But I urge you instead to take a far more proactive, creative approach: CAC lands should be purchased outright and subsurface estates vacated whenever possible, and efforts by the corporation to develop these lands should be resisted to the extent that the US government is capable of doing so. CAC is a profit-driven corporation, and should be compensated for their resources, but not

allowed to spoil one of America's finest public treasures by piecemeal development in some of our most precious locations. I strongly urge you to invest a great deal of effort into purchasing inholdings and subsurface rights, starting with valuable ecological and recreational areas, such as on Knight Island and in Port Gravina.

2. Despite repeated requests that the Plan Revision address the rapid decrease in abundance and viewability of black bears, and the longer-term decrease in brown bears, the plan fails to do so, and as such fails to address a biologically and socially important sustainability issue. After ample public input, the complete omission of this issue is a needless oversight.

Rather than selecting important, germane issues to tackle, too often the Revision resorts to trivial "boilerplate" language, such as stipulating that "all open top vertical pipes with an inside diameter greater than one inch shall incorporate design features to prevent animal entrapments." (Standard FW-G1-ST-07 p. 29) Good idea, very specific, but as does much of the document, it appears to be lifted from a convenient outside source, while many of the more pressing, relevant local issues are shorted or completely absent from the document.

3. Part 3 Management Area Management Direction

The suitability matrix on p. 42 indicates that actual management is unlikely to achieve the desired outcomes of "sustainable, multiple uses of the land and resources for present and future generations" or "desired social, economic, and ecological attributes...across the landscape." (Resource and management vision, p. 1) For this goal to be even remotely achieved, it will of course be necessary for the USFS to prioritize which uses, how much, and where sustainable multiple uses are compatible.

The following suitability determinations are probably largely inappropriate:

WSAs: Soil/watershed projects; wildlife habitat projects; Fish habitat projects, personal use timber harvest (emphatically unjustifiable in most areas of CNF, but particularly in WSAs!)

Wild and Scenic Rivers: electronic sites and commercial helicopter landings degrade the resource (e.g., wildlife disturbance and consequential harm to resource and to visitors' experience of resource) and strongly negatively impact visitor experience. I am perplexed by the absence of recommended Wild and Scenic Rivers in PWS, where many potentially qualify.

Backcountry Areas: Most of eastern PWS falls under this designation. Many parts of the eastern Sound have wilderness qualities that are not adequately protected for long-term sustainability under the proposed "backcountry" designation.

The following uses, rather than being generally acceptable, should be unacceptable or acceptable in exceptional cases: personal timber harvest (long-term visual and ecological alteration of high-value public recreation lands; does not meet ecological sustainability criteria when considered as a cumulative impact in an already stressed system; personal timber sales should be considered, if at all, in non-recreational, non-high value habitat, and not in remote sites), saleable minerals (destructive to general public's interest in a biologically productive, outstandingly scenic, high-recreation value public land), day use facilities (in carefully vetted circumstances); electronic sites (existing telecommunication sites already mar the skyline of too many peaks and ridges; vetting process for new site on ridge between Jack Bay and Port Valdez was poorly conducted, with the principal spokesperson for Jack Bay landowners not even notified of proposed changes. Improve guidelines for vetting sites.); commercial helicopter landings (highly disruptive of ecological sustainability goals and wilderness values that are the primary goal of backcountry management.); recreation events and outfitter/guide assigned sites, rather than being generally acceptable uses, should be vetted and permitted on a case by case basis, with awareness that large gatherings or inappropriate uses that conflict with underlying management goals should be summarily denied. Again, the wilderness qualities of PWS represent a national public resource that is exemplary,

extremely limited in supply (in the inventory of national public lands) and will become ever more precious in its current largely-wild state.

Helicopter skiing and hiking is not currently permitted in either all backcountry lands or, at least in much of the eastern Sound, including the headwaters of Jack Bay. Prohibiting recreational/commercial helicopter use was a primary focus for dozens of citizens who wrote to District Ranger Cal Baker in the late 1990's asking that this intrusive practice not be allowed on federal public lands.

"Backcountry provides opportunities for solitude and isolation when traveling cross-country and supports subsistence and tourism-based opportunities." (p.50) Helicopter overflights and landings would profoundly alter the remote, rugged, self-reliance-requiring attributes that today remain a quintessential quality of Prince William Sound, and are inimical to "solitude and isolation." Likewise, helicopters are potentially destructive to ecological sustainability goals stated in the Plan Revision. I have watched mountain goats flee from overflying heli-skiing helicopters in dangerously steep terrain, and witnessed another helicopter careen down a mountain valley below tree tops at the same time a brown bear was making its way down valley laboriously through deep snow. Commercial recreational helicopter use impacts a large area in many ways, benefits relatively few people and should not be allowed on federal public lands. Ample suitable state-owned lands are present around all population centers to allow a modest development of this high-impact form of commerce and recreation. Growth of this industry is not sustainable in the sense that it impacts so many other desired outcomes for the national forest. All backcountry areas should remain off limits to commercial helicopter landings, summer and winter.

MA1 Wilderness Study Area:

"Management Intent: ...to preserve currently existing wilderness character and potential for inclusion in the National Wilderness Preservation System." This is clear, useful, language.

MA 1-DC-01 "The WSA is a defining feature of western Prince William Sound where visitors find opportunities for solitude, remoteness, closeness to nature, and self-reliance in a natural environment of coastal rainforests and tidewater glaciers. The WSA supports subsistence uses, a robust recreation and tourism economy, and a commercial fishing industry while maintaining its wilderness character." This is wishful thinking: the first sentence and the last contradict one another, as do the first and last clauses of the second sentence. Already, tour boat traffic, commercial kayak operations, floating live-aboard deer hunting operations (Port Chalmers), excessive sport hunting for black and brown bear, impacts of hatchery pink salmon on native stocks, increased tourism and a host of other assaults that will increase in coming years have degraded the wilderness character in PWS. Especially concerning Wilderness Study Areas, I would like to see a more realistic, firm-handed approach to managing for long-term preservation of existing wilderness qualities insofar as possible. This will mean a dedication to understanding, describing and creatively protecting the most fragile qualities of wilderness. For starters: restrict commercial permits and cancel them when deemed harmful to wilderness or wilderness experience; encourage less-consumptive and low-impact uses, rather than more consumptive uses that alter the land and sustainable uses; CNF (PWS and Copper River, at least) is first and foremost ecological- and recreationally-focused, and will be incrementally degraded to the extent that the USFS acquiesces to accommodate non-sustainable uses. A granite mine in Port Gravina cannot fail to have serious detrimental impacts on recreational quality, wilderness character, and to an unknown degree, terrestrial and marine fish, birds and wildlife. Hence, it should not be considered "sustainable management."

"Guideline MA 1-GL-04 Trails and facilities..." Compared to other national forests, Prince William Sound has precious few human trails and facilities. What we have is a genuine wilderness where people have the opportunity to learn to respect and use natural terrain and biotic features of the landscape to travel safely and efficiently. Old growth forest, avalanche tracks (when snow covered), game trails, muskegs and other natural features help, hinder, and in all manners influence human activity here, and in so doing offer a very different experience and require different competencies and attitudes than typically encountered on heavily visited and

managed national forests. I'm disappointed that a sensitivity to this distinct quality and opportunity for creative conservation management is barely recognized in this document. Can it be that CNF staff are genuinely unaware of or do not value these qualities? If we do not protect them, we will lose them! Please state clearly that sensitive use of natural travel routes is the preferred option, and that trail construction will be carefully planned to avoid "unwinding" most areas of CNF that lack man-made trails. This is an asset, not a liability!

"Guideline MA 1-GL-07: New land uses should not be authorized when reasonable alternative locations for the use exist outside the WSA." (p. 44).

I suggest you end the sentence after the word "authorized" so as to avoid deterioration of the existing wilderness character. Your primary responsibility is to the American public, measured over an indefinite period of time into the future. Americans are not lacking commercially-mediated experiences, even in Alaska; they are in profound need of genuine wilderness to experience, and PWS offers some of the best in the Nation. Please do not degrade it in order to spread the experience over a wider population in the short term, and diminish the place and experience in the process. Likewise, the short term economic prosperity of local communities is an important goal, but should not be purchased at the expense of long-term erosion of the very qualities that have allowed these communities to exist, or qualities that will be sought by our children's grandchildren.

The Scenic Integrity Objectives map shows that essentially the entire eastern Sound, and much of the north west portion, as well as all of the islands (with the odd exception of two of the less scenically exceptional islands, southern Green Island and the western Naked Island group) are proposed to be managed as "High" instead of "Very High" scenic integrity. The logic for this approach puzzles me. Noting that "we can see one telecommunications tower in the distance," should not be used to justify installing others that further degrade the viewshed.

Instead, I urge you to maintain all parts of PWS that qualify as "Very High" scenic integrity to remain very high. In particular, Jack Bay (because I have worked for twenty five years to keep my "backyard" here in exceptional condition), the Columbia Glacier/Glacier Island area (due to extraordinary scenic, recreational, scientific, and subsistence value, as well as relatively easy access from Valdez); Port Gravina (due to its de facto status as having the greatest wilderness quality, scenic value, and biological productivity in the eastern Sound); Montague and Hinchinbrook barrier islands; south western passages and islands and Port Bainbridge; and College Fjord area each have largely "very high" scenic integrity and should remain as such.

As I have urged before, please take this plan revision back to the drawing board for substantial revision. Sustainability does not require half-way measures. Please reconsider your responsibility to protect these public lands and resources more thoughtfully and effectively in perpetuity.

Sincerely,

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Cc:
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