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Comments: Mary Rasmussen/ Chugach National Forest Plan Revision Team

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Dear CNF Planning Team:

I have enjoyed Prince William Sound every year over the past twenty five years. My introduction was by sea kayak, and my family still enjoys paddling the Sound's wonderful and wonder-filled coastline. We also hunt, fish, pick berries, ski, climb mountains, sail, and have spent many of the finest days of our lives during all seasons out in Prince William Sound. We are contiguous landowners, where our 20 acre homestead in Jack Bay abuts EVOSTC lands that we worked long and hard to have transferred from the University of Alaska to CNF. And we have a long history of working effectively and amicably with CNF staff, principally the Cordova District, over many years.

My principal feeling toward CNF managers is one of deep gratitude. Prince William Sound remains a nationally and globally important wilderness recreation area, at the same time it serves a wide variety of other functions for Alaskans and local communities, including commercial fishing, sport hunting and fishing, wildlife viewing, cruising and, of course as a transport route that serves Alaska and the oil industry. Managing all this is clearly a challenging task verging on the impossible! I'd like to commend and thank you for doing a pretty good job! And, I'd like to challenge you to do better, despite the strong contradictory pressures and demands placed on you from all quarters. Unless your planning documents reflect a clear conservation vision and intent, the outcome is easily predictable: more or less rapid degradation and loss of the wilderness character that underlies the emotional, functional, and sustainable economic value of Prince William Sound. We are seeing that degradation happening today.

I will start by saying that I found this document to be even more challenging than usual to get information from. I suggest that you include your chart (or equivalent) "The forest Plan Revision process" showing Assessment, Plan Revision, and Monitoring with relevant sub-steps as part of every free-standing portion of your documents; for instance on page 1 under "Introductory Framework". It took some time poking around in cyberspace to make clear what step and purpose this current document we are commenting on represents. It may be clear to you planners, but not so to those of us who don't have endless time to come up to speed.

In order to make the document more easily interpreted, please state clearly, in narrative form, what you intend to keep the same, and what and how you want to change, in terms of conditions and management style. We should not need to learn that you will/won't allow new helicopter access to areas previously off limits from one table or map in the document buried deep in the document. The details should implement the general picture; as it is, the general picture is muddled by the welter of massed data, nested descriptions, etc. I understand it is complex, but please try to lay out simple, general, relevant descriptions.

In Part 1, Resource Management and Vision, the plan states, "The vision for the Chugach National forest is to maintain the terrestrial and aquatic ecosystems that occur within the national forest and to sustain an array of ecosystem benefits for southcentral Alaska." Because the overarching character of Prince William Sound, the Copper River Delta, and much of the Kenai area of CNF is inextricably tied to its wilderness character, including fish and wildlife, scenic grandeur, and recreational opportunity, I encourage you to reorganize the Plan to recognize this inherent primacy of protecting as undiminished a natural condition of the Forest as possible, and only within these constraints allowing sensitive secondary uses to occur. For better or worse, wilderness

character is a fragile quality that is easily compromised, but this fact should not stop CNF planners from doing a better job of vigorously protecting existing wilderness character. By doing so, you automatically protect a suite of other compatible, sustainable uses, and establish a metric (non-degradation) for assessing which secondary activities and how much can be allowed. As written, it is hard to ascertain if CNF planners even understand this principle, let alone how they would implement it. Instead, the Plan reads as a confusing mix of "sustainable" shrinking Wilderness Study Areas, undefended EVOSTC lands, mining, small timber harvest (even in WSA's and backcountry lands), and potential for incompatible economic development somehow coexisting with some of the very finest coastal public land -and arguably the wildest!-in our nation. This is not achievable, and the result will be significant ongoing degradation.

"What distinguishes the CNF from other public lands with the same characteristics is that it is managed for multiple uses as defined in the Multiple Use Sustained Yield Act of 1960" (p. 9) Yes, PWS is close to Anchorage, but this sentence belies the characteristics that most importantly distinguish it from other public lands: PWS is extraordinary first and foremost because of its exceptional beauty, biological productivity, ecological intactness, accessibility (relative to most of Alaska's coasts), and remoteness (relative to the road systems, and as one travels into the uplands away from the actual coast. Again, I urge you to re-envision the concept of "multiple use" as a nested concept wherein the primary goal is a sustained condition of wilderness or as close to wilderness as possible, and secondary uses are carefully arranged so as to be genuinely sustainable. This would be visionary and truly useful management for this jewel of our National Forest system.

Under "Management Challenges" (p.12) rapidly increasing visitation during the past decade and attendant managing a new magnitude of impacts should definitely be discussed. Also, the Valdez Harbor expansion will increase visitation to the central and eastern Sound, echoing some of the problems attending the Whittier Tunnel road construction; not mentioning this and planning for it in advance is a significant shortcoming in this document. "What have we learned in the western Sound? How can we do better in the east?" One obvious example is the impact on black bears, one of the most iconic and frequently seen denizens of the coastal rainforest. Today, we can spend a month sailing and hiking throughout the Sound and scarcely see a bear. This marks a dramatic, highly regrettable mismanagement by ADF&G, but the USFS has played a role in their failure to intercede. Please discuss how you will address this ongoing problem promptly and creatively!

The discussion of Aquatic Ecosystems (p. 12) fails to mention the impact of climate change, later salmon run timing and genetic effects of hatchery salmon on pink salmon stocks, an ongoing concern for this pivotal element in terrestrial, aquatic, and marine ecosystems.

Under "Terrestrial Ecosystems," even here, when discussing human-bear interactions, no mention is made of the recent disappearance of black bears: causation, impacts to ecosystems, tourism, hunting, etc. This is despite a clear request that the current document address this decline from a number of adjacent landowners (Letter to Planning team from Jack Bay landowners on 6-2-15). Please correct this oversight.

"Prince William Sound Geographic Area" "Ninety-six percent of the area is classified as either backcountry or wilderness study area and is managed to retain this character." (p. 15) Unfortunately, historical and recent practices degrade the wilderness quality of far more than four percent of PWS. I'd encourage Planners to explore options to reduce ongoing erosion of wilderness quality. Throughout the document, mining, communications facilities, organized recreational activities, commercial tourism, aquaculture, small-scale timber harvest, etc., exemplify loss of sustainable wilderness value for the general public on behalf of short-term economic gain. Please think not only of the "foot print" of disturbance, but also of the capacity to degrade large areas of adjacent de facto wilderness quality. This is particularly true for the eastern Sound, where ongoing development threatens the integrity of public lands. One approach here is to attempt to secure remaining areas with exemplary wilderness character using extraordinary efforts. Port Gravina and Sheep Bay, Hinchinbrook and Montague Islands should all receive greater attention as Wilderness Study Areas by CNF planners.

Goal 1: Provide for Ecological Sustainability. "...maintaining the integrity and productivity of plan area ecosystems." (p.17) I'm pleased to see this listed as the first management direction goal. However, for it to be meaningful, it would help to state clearly if you intend to maintain existing ecosystem diversity, including species richness and abundance. This excellent goal is a high bar to achieve, but eminently commendable! If so, state this, and explain that other goals, such as economic development, are subordinate to this goal-not vice versa. "Terrestrial species composition, distribution, genetic diversity, abundance, and reproductive resilience are characteristic of the terrestrial setting and disturbance regimes of the geographic area where they developed." Excellent, strongly worded goal! But, again, a good faith effort to deliver on this goal requires that it take priority over, say, the ongoing excessive hunting pressure on brown bears that has made them less and less visible in the eastern Sound, and especially the clear present downward trend in black bear populations due to excessive hunting pressure and possibly natural causes.

This section would benefit markedly from a discussion of the additive, progressive effects of cumulative impacts. Detrimental changes to the overall ecological and recreational quality of PWS need to be measured and should be mitigated. For example, the extensive clear cutting on Tatitlek village corporation lands in the Port Fidalgo area harmed ecological, recreational and commercial interests in nearby CNF lands. CNF should attempt to prevent similar degradation of nearby Port Gravina by Chugach Alaska Corporation's proposed granite mine, recognizing that the eastern Sound has suffered from this clear cutting, and that it is regionally important to redouble efforts to protect wilderness qualities where they remain.

Under Goal 2: Contribute to Social and Economic Sustainability, this prioritization of protecting natural ecosystems so as to continue to provide for sustainable economic benefits based on healthy ecosystems is well conceived and to be commended. I encourage you to treat "wilderness" and wilderness qualities in the same fashion, recognizing that eroding wilderness is not in the long-term or sustainable benefit of local communities.

Land Ownership (p. 20). FW-G2-DC-04 "Land ownership adjustments through purchase, donation, exchange, or other authority are used to consolidate lands, produce management efficiency, and to support resource management objectives." I applaud this goal wholeheartedly! Pursued vigorously and creatively, this is an appropriate exercise of Federal Government foresight and wherewithal. The small "foot print" of the proposed Chugach Alaska Corporation granite mine in Port Gravina is a case in point. The public has already spent millions of dollars through the EVOSTC to safeguard this valuable land, but we are in danger of compromising one of the finest de facto wildlands in the eastern Sound by allowing CAC to build a loading dock, blast, and disfigure a public treasure. I most strongly urge CNF to work with EVOSTC to address their lack of foresight during original transactions and to purchase/trade or otherwise acquire subsurface rights in Port Gravina. The uplands (inventoried roadless area) surrounding this lovely, biologically outstanding embayment should be re-examined for inclusion as a Wilderness Study Area to achieve the protection it merits.

Scenery (p. 22): The scenic dimension of Prince William Sound has not been adequately addressed in this document. For many Alaskans and visitors from around the world, this place epitomizes dramatic, wildlife-filled wilderness. The goal FW-G2-DC-08 is exemplary except that "the entire PWS area" should replace the phrase "in the places people prefer to visit." Visitation in the eastern Sound is less intensive, as for other more remote parts, such as the barrier islands and south western passages; these areas also contain spectacular gems (Port Gravina, Sahalin Lagoon, Port Chalmers, etc.). I suggest much more liberal inclusion in areas defined as "Very High Scenic Integrity" especially when it comes to allowing additional, new visual elements that detract from the wilderness character of the landscape.

Fish, wildlife, and plants (p. 22). FW-G2-DC-10 USFWS public use cabins are popular for hunting parties, as well as for wildlife viewing enthusiasts. In Jack Bay, siting the USFW cabin adjacent to the Naomoff River saltmarsh has resulted in the near absence of brown and more recently, black bears in this area that was formerly an ideal and much-loved bear viewing area that is easily accessible from Valdez. As such, it means that visitors to Chugach National Forest using small boats from Valdez have little opportunity to view brown bears.

This "hands off" management is neither in keeping with the intent of this management goal, nor with the public interest. Hundreds of people can watch a single bear over the course of a season, but only one person can shoot it. My husband and I have relied on black bears for food while living in Jack Bay in the past, when they were abundant. We are avid hunters. But we do not approve of allowing hunting pressure to depress or displace wildlife populations or to deprive the general public of extremely valuable opportunities to experience the full spectrum of wilderness in Alaska. Please give this some careful thought...doing so would mark the type of careful, creative management that Prince William Sound needs and deserves!

Roads and Trails Access FW-G2-DC-14 (p. 23) "A system of roads, trails, and areas designated for non-motorized and motor vehicle use is identified and is available for public use." This section fails to note that a distinctive-actually, unique-attribute of the PWS area of CNF is it's near lack of man-made trails, and the exceptional wilderness quality that this lack provides. Every one of the hundreds of hikes we have taken from one end of PWS to the other has involved trails-game trails! Please discuss the absence of man-made trails and identify the continued absence (with some notable exceptions in carefully chosen areas) as an attribute of genuine wilderness, and a milestone that most National Forests can only recall from the distant past.

Renewable and non-renewable energy FW-G2-DC-15 (p. 23) "Exploration, development, production and transmission of renewable and non-renewable energy...are conducted in a manner that minimizes adverse impacts..." The specter of Chugach Alaska Corporation's desire to dam the Duck River and flood Silver Lake come immediately to mind. I strongly urge CNF planners to set a clear "wilderness, wildlife, and wilderness recreation priority" in this document. Sections like this one create anxiety that CNF staff think we can accommodate power lines running through this pristine landscape with "minimal impact"! The CNF map that shows inventoried roadless areas that allow road building versus those that do not allow road building implies that we could see a road built up the Naomoff River in Jack Bay to support a transmission line from Silver Lake to Valdez. How is this compatible with a "backcountry" designation? Confusing and disturbing! I support maintaining all roadless areas as WSA's or at a minimum backcountry with no road-building allowed. This confusion is added to by FW-G2-DC-21 "The undeveloped character of inventoried roadless areas is retained by restricting road construction, road reconstruction, and timber harvest activities.." (p. 24) Please clarify your intent in narrative format.

Key Coastal Wetlands FW-G2-DC-26 (p.25) The bulleted points under this section offers clear, measurable objectives that lay out a strong conservation priority: no degradation. Very good! I would like to see this sort of unambiguous language employed to clarify a conservation intent throughout the document.

Ecological Sustainability objectives would benefit from an assessment of what the primary threats to ecological sustainability are, and how to avoid or mitigate them.

Land ownership FB-OB-09 "identify and prioritize up to 50 opportunities to unify split estate NFS lands". Great objective! I'm fully supportive!

FB-OB-09 "During the first decade ...pursue the exchange or acquisition of at least one land ownership interest..." This is a disappointingly low target! Collaborate with EVOSTC to multiply this by an order of magnitude! ANCSA and other inholdings represent one of the greatest threats to the ecological, recreational, and overall value of PWS! Purchasing, or acquiring complete (not only surface) easements for Growler and Heather Islands in the Columbia Glacier area, and CAC lands in Port Gravina and on Knight Island alone would be an immense buttress to the public value of CNF lands! Please rethink and re-commit to this very important issue.

Sustainable Recreation (p.27) These objectives are underwhelming, considering that wilderness recreation is CNF's central raison d'etre.

The General Suitability determinations for management areas ( table 6 on p. 42) lists a smorgasbord of incompatible uses. Consumptive uses that degrade wilderness quality (visual, auditory) should generally not be allowed in wild and scenic rivers, WSA's, or backcountry areas. We are especially concerned with snowmachines and heli-skiing in the high country surrounding Jack Bay-they destroy the qualities that we work hard to reach by foot and by ski, and they're hard on the wildlife.

Please review this table and remove incompatible uses that serve to degrade existing qualities.

Looking over the map appendices, I'd like to offer the following comments:

Map 2: Watersheds. I believe I understand that there are no Wild and Scenic Rivers recommended in PWS. This is hard to understand, since this designation would undoubtedly work to help conserve the wilderness quality of many of our finest anadromous streams. In Jack Bay alone, I would like to nominate the Naomoff (Jack) River at the head of the bay, and Vlasoff Creek, that flows south into the Jack Bay State Marine Park. Both have outstanding qualities that prompt a close look by CNF planners. The Naomoff, in particular, is biologically and scenically outstanding, offering a long, low-gradient floodplain that supports extensive pink, chum, and silver salmon spawning habitat. This is the most important habitat for brown bears in the area, connecting with the Port Fidalgo salt marshes via a high pass. Osprey and Sandhill Crane nest here-uncommon in this part of PWS-and beaver occur also. The upper part of both the north and south forks of the Naomoff are incised and run beneath spectacular peaks. This area could be threatened by transmission lines if Chugach Alaska pursues their plans to construct a hydroelectric dam at Silver Lake. Vlassof Creek is the second most important habitat for brown bears in jack Bay; here, too, they have been hunted heavily and are seldom seen today. The short stream course falls through an impressive gorge beneath an impressive hanging glacier. Why do we not see many of PWS's exceptional streams considered for Wild and Scenic Status?

Map 6: Scenic Integrity. Scenic integrity should have kept CNF from permitting the new communications tower on the north rim of Jack Bay! Likewise, I encourage very high scenic integrity objectives across this magnificent area!

Map 7: Inventoried Roadless Areas. As I stated earlier, I am puzzled by large areas of inventoried roadless areas where road construction is permitted. I am particularly disturbed to see that the backcountry areas at the head of Jack Bay, Port Gravina, and other wilderness quality areas that I enjoy on a regular basis are designated so as to permit road-building. Please explain this apparent contradiction and reclassify these areas to protect their ecological, scenic, and recreational integrity.

Thank you for the opportunity to provide input during this important planning process.

Sincerely,

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