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Comments: Please see attached comments.

Comments regarding the Proposed Revised Land Management Plan for the Chugach National Forest.

Submitted by Carl Kretsinger; 19 February 2016

To: Mary C. Rasmussen, Planning Lead
I.The public has paid handsomely to acquire tracks of land (EVOS lands) to be managed so as to maintain conservation values into perpetuity, and yet as identified in the draft plan, some of these areas may be subject to development of the subsurface estate ultimately negating the purposes of the acquisition. A good example of this may be found in the eastern portion of the Prince William Sound geographic area within Port Gravina (see proposed mineral estate development by the Chugach Alaska Corporation within Port Gravina currently under review by the Cordova Ranger District).

As captured in the current draft, the plan allows for the acquisition of subsurface rights from willing owners. This would be the ideal scenario and it is good to see captured in the draft plan but in the event of an unwilling seller and as a means to maintain the purposes of the EVOS acquired land, the strategy for employing compensatory mitigation for these lands (and other lands within the planning area) should be incorporated into the plan.

It appears that the Forest Service has developed and may be close to releasing a framework for how and when compensatory mitigation will be used. I was unable to find this framework but a document prepared by DOI for Bureau of Land Management (Regional Mitigation Manual - MS 1794) can be used in the interim to gain insight as to how mitigation should be used to compensate for lost ecosystem function(s) throughout the period of project development, operation, and until recovery is complete.

II.It is not clear how the Forest Service will determine if management of the Chugach National Forest is meeting the desired conditions since many of the desired conditions outlined in the draft plan are subjective and have no measureable indicators or thresholds of performance that could be incorporated into a monitoring plan.

Some good examples of how desired conditions should be written can be found in the USDA Watershed Condition Classification Technical Guide (Forest Service document: FS-978; 2011). In the FS-978 document, a core set of watershed attributes are identified along with indicators and performance thresholds. Used together, the attribute, indicator and performance threshold allow watershed function to be ranked (Functioning Properly, Functioning-at-Risk, and Impaired Function). Since much of the land in the planning area is in natural condition and Goal 1 of your draft plan calls for maintaining ecosystem integrity and resilience, many of the thresholds outlined in FS-978 may need to be adjusted to reflect the desire to maintain this current level of ecosystem function.
III. The Fidalgo-Gravina Wilderness Inventory Area should be incorporated into the plan as a Wilderness Study Area (WSA) for the following reasons:

*Area currently meets the suitability criteria for consideration as a WSA (see Chugach Wilderness Area Inventory and Evaluation);
*Management of the area as a WSA would lend itself to the Forest wide goal of maintaining the integrity, resiliency, and productivity of the ecosystem while sustaining the current beneficial uses for future generations. Most of the ecosystem benefits now being provided by this area under its current management prescription (Backcountry) would be realized under the WSA management prescription;

*As a WSA the area would be compatible with the Marine State Park management objectives, EVOS surface estate conservation objectives, and management of the Olson Bay RNA --- all of which are within the Fidalgo-Gravina inventory area;
*Currently the Fidalgo-Gravina inventory area is largely intact and in a functioning condition dictated by natural patterns of disturbance and natural agents of change. Given the competing management objectives and propensity for development of State, Private, and BLM managed lands that surround the Fidalgo-Gravina inventory area this area is vulnerable to anthropogenic change agents and should be managed as such. It is foreseeable that if the area remains in a less protective management prescription for the next planning cycle, that the characteristics of the area may be degraded to the extent that the area will no longer be eligible as a WSA (e.g. currently identified in the draft plan as approved for road construction) and the public would have lost its chance to include the area in the National Wilderness Preservation System;
*The area is known to provide habitat for up to 129 populations of salmon, which further support many of the goals and desired conditions identified in the draft plan (including recreation and tourism, subsistence, and ecosystem productivity);
*The hydrologic regime of the 6th level hydrologic units making up the area is predicted to remain unchanged under the future climate change scenario (see USFS 2014 Chugach Forest Ecological Assessment); stable hydrologic conditions make this area an ideal area to protect so as to ensure the long term maintenance of salmon production within the eastern Sound;
*The area provides important habitat to many of the sensitive species still recovering from the Exxon Valdez oil spill (see: Assessment of Human Use and Associated Risk to Sensitive Resources in Prince William Sound, Alaska, USA (Suring and Poe 2010). Because of its easterly location (upstream of prevailing east to west ocean circulation patterns in the Sound) it offers a strategically placed refugium for a variety of species in the event of a future oil spill;
*The area supports a substantial population of mountain goats which have a high fidelity to summer and winter ranges and are therefore sensitive to potential development;
*Currently ecosystem services provided by this area are not threatened by non-native plant species (see 2014 assessment Chapter 2 Ecological Conditions and Trend). This could quickly change under a less protective management prescription.

IV. The EVOS land acquired along the southern shore (Tongue Point) of Jack Bay is not shown on the map titled: Chugach National Forest Revised Management Areas. This may be just an issue related to the scale of the map but please check your data layer.

V. Much of the landscape throughout the Sound (e.g. Columbia Bay, Montague Island, Fidalgo-Gravina Wilderness Inventory Area) is spectacular and as such adds significantly to the overall ecosystem benefits provided by this area. It is unclear why much of the PWS area falls within the "High" scenic integrity rating and not the "Very High" rating. Please explain and provide the basis for this rating.

VI. Many of the Standards and Guidelines use vague and subjective terms such as "minimize", "may", "should" allowing for a range of interpretation or application. Standards and Guidelines should be worded in such a manner so as to be clear concise statements that are not open to a range of interpretation or worse yet, allow the standard or guideline to be dismissed (e.g. MA3-GL-03 "RNAs may be withdrawn from mineral entry for locatable minerals."

VII. The Fidalgo-Gravina wilderness inventory area is shown on the Inventoried Roadless Area map as being an area in which road construction would be allowed. Since the eligibility to be a wilderness study area is dependent on an area not having roads, road construction should not be allowed in this area until the area has been nominated as a WSA and congress has a chance to act on the recommendation;

VIII. Based on the Wild and Scenic Rivers Assessment it is unclear if the Naomoff River and Vlasoff Creek (ADFG Anadromous stream #221-50-11270 and -11290 respectively) that drain into Jack Bay (NE portion of

Prince William Sound Management Unit) were ever evaluated for eligibility. I recommend that these streams be considered for inclusion in the Wild and Scenic River program based on the following: both streams are free flowing and in pristine condition from a water quality, geomorphic, and watershed function perspective. Both streams offer a variety of Outstanding Remarkable Values (ORVs) that include: scenery, opportunity for solitude, wildlife, and fishery values that support recreation, commercial, and subsistence harvest and opportunity. The number of recreation user days within Jack Bay is substantial. Visitors to the area are from Alaska as well as other states and countries.

Salmon produced in both streams drive the food web that, in turn, support both the large terrestrial mammals such as the brown and black bear that inhabit these watersheds to marine mammals such as the humpback and orca whales that return to Jack Bay on a routine basis. Wildlife supported by the fish produced in these streams offer outstanding viewing opportunity to visitors from around the globe.

Pink and chum salmon produced in both streams help sustain the overall commercial salmon fishery in the region and which supplies products that are offered on both regional and national basis. ADF&G recognizes these streams as being important components to the overall salmon production in the region and uses both streams as indexes to wild stock escapement. Pink and chum salmon that spawn in these two streams also provide an important genetic reserve that is important for long term retention of wild stock characteristics. Long term maintenance of the genetic health of the salmon produced in these streams will, in turn, aid the Forest Service in meeting its management objective of ecological sustainability and resilience given foreseeable climatic and anthropogenic change.

In addition to the aforementioned, the objectives associated with the management of the Naomoff River and Vlasoff Creek as candidate Wild and Scenic Rivers would be compatible with adjoining State management objectives within the Marine State Park and further the existing recreation emphasis of the Forest Service within Jack Bay.