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Title:
Comments: From: Bruce Smith

To: FS-objections-alaska-regional-office

Subject: Objection to decision in Wrangell Island Project.

Date: Saturday, July 29, 2017 9:23:56 PM

Beth Pendleton, Regional Forester

Wrangell Island Project

I have the following statement in objection with the decision to close part of the 50024 road during your Wrangell Island Project implementation. Your decision states that email service is allowed and here it is. I am hoping that I don't get my objection booted because of a technical error so if you find a problem with the format please let me know. If you need a signature, let me know and I will mail you a signed hard copy.

I have read through your proposal and explanations. To me it appears that there is a preferred plan (#2) and that others were provided as comparison plans. There is a lot of comparison to other plans about which is better for each subject but it seems to me that you are not willing to move outside the pre-determined confines of a single plan. My impression is that your mind is made up and you are just justifying your pre-made mindset. I do not feel that you are actually considering any changes that will affect the outcome of the pre-determined plan. This comment and objection period is just a requirement per your rules and likely a waste of time I am guessing. Is it easier to stick with a plan as written versus all the study and changes and notifications that would be required to do the right thing?

I have continued objection to your closing well used subsistence access roads. In my previous letter I wrote about two roads that were important to me. I can see that the 50009 road is a lost cause at this point but will point out that it is definitely a hunting area. Maybe not high use but

that may also be why it is a good hunting area. I have seen enough sign and photos on game cameras to say there was/is more than just a few of us hunting that area. That said, I will focus this objection to the highly used 50024 road.

The Basin roads, 50024 and 6263 are well used roads come fall time. I have already stated that these roads are used for spring/fall bear hunting, deer hunting, moose hunting, berry picking and firewood harvest. I can tell you that there is a lot of traffic the times I am out there, mostly during moose season, on both roads. I hear/see numerous vehicles traveling both roads during the day while I am hunting there. I do not know your definition of "receiving little known use" or how you determined that information. I request to see your data to back up your claim. I will tell you that in recent years I have seen more hunting activity in this area and I am finding newly flagged trails in areas I have hunted for many years appear in the last couple of seasons. I will also state that there have been many more moose hunters on the Wrangell Island in recent years than I have seen in the past. The last two years has a lot of new competition I have not seen before. Maybe it is a passing fad but maybe it is the new trend! The fact that these roads are so close to town with so much to offer makes this area a great place to go with less gas and driving required. With your current main road surface problems having unusually large surface rocks regularly tearing up tires, I am very hesitant to drive past Salamander. I can only assume you have received many complaints about this problem over the last two years, I know I have had two flats in two trips out there this year alone. The lack of access roads, or the ability to reach them, only places more competition and stress on the few remaining roads which greatly affects subsistence hunting success.

Back to the 50024 road. I am only talking about the historic older section of the road, not the newer extension that steeply climbs the mountain. You state that you consider the subsistence, hunting, recreation values for the public compared to the maintenance cost, soils, water quality, fish and wildlife. I would say that the subsistence and hunting values of this area are pretty high. The issue with soils I would not expect to change whether the road was left as is

or left with holes dug in it. Water quality will not be affected because of the same reason, the road will still be there and the small creek at the bottom of the valley is a distance off. There are no fish to be concerned about here and wildlife only have to worry about us hunters. The fact that you won't access the other areas of this mountain because of the 2001 roadless rule leaves plenty of area to support wildlife where hunters generally will leave them alone, like when you killed the 50034 road. So the only thing I can see left here is the cost of maintenance. How much are you talking here? The lower section of road is well established and my recollection of maintenance over the years has been very minor. I recall a time about 12-15 years ago when the alders had overgrown the road to the point where a couple of us cut them back to reopen the road for a truck to drive through. The road surface was not improved over those years until the recent logging activity took place. The old section is relatively level and very well established and not much maintenance is required here as history has shown. The only area of surface maintenance concern I recall is the first couple hundred yards of the road as it leaves uphill from the main road. If you have different information I would like to see it. If your maintenance cost is a concern how about just leaving it set until nature retakes it while those of us that use it will make use of whatever years it provides? Personally I would like to see at least another ten years for myself and longer for my children. Ten years is definitely not unreasonable and I would expect very little to no maintenance is needed during that time given the great current condition of that road currently. What value does your study place on the subsistence and recreation value of this road compared to the maintenance cost projected? In comparison to the cost of leaving the road there and accessible, how much is it going to cost to dig it out?

Even you state in your findings that "public road access is closely tied to subsistence use in the rural subsistence communities such as Wrangell." My understanding was that the USFS had a policy of supporting rural subsistence uses. This particular decision to close access roads to

known subsistence use areas that have been used for several decades seems to contradict that policy.

I also want to discuss your selection of wildlife. You seemed focused on Deer, Wolves, Marten, Voles and Goshawks. You seem to have no care or idea about Moose. Let me tell you about Moose, they are very large deer like animals that inhabit the lower and upper areas on both sides of the basin. I have personally pulled four moose from this Basin valley, either solo by myself or helping others. Of those moose removed from this valley, 100% were pursued starting on the upper 6263 road and 75% were taken to the lower 50024 road for transport to town. Unlike a deer where you put in on your back or drag it out in one trip, moose require multiple trips back and forth to remove when hunting alone. If you look at the steepness and distance to reach the upper 6263 road, you should see how unrealistic it would be to pack a moose up there after chasing one to the valley bottom. It is the ability to hunt from either road and yet pack the moose (or even deer) to the lower 50024 road that makes this a viable location for subsistence hunting. I would also mention that if it was not for the State's very strict antler restrictions on Moose, we would have harvested a lot more moose from here over the years.

I would like to see your data to support your claims that this road is receiving little use. I would like to see answers and understanding to the several questions throughout my objection. I would like to see your assumed value put on subsistence/recreation use versus maintenance cost projections (please be specific on maintenance costs as I am skeptical that it would amount to much). Most importantly I would like your re-consideration on the value of this road and see that you leave it open and accessible for subsistence and recreation use.

Bruce Smith

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