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From:

Kendra Zamzow

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Attn: Chugach National Forest Service

Re: Chugach Forest Plan Revision #40816

chugachplanrevision@fs.fed.us

To whom it may concern: Thank you for the opportunity to comment on the proposed Chugach Forest Plan Revision, #40816.

I formerly lived in Cordova and commercially fished in Prince William Sound (PWS) and the Copper River flats. I currently live between the Chugach and Talkeetna mountains. I have been coming to Alaska since 1974, and have been a resident since 1986.

I firmly agree with your Forest Management Goals:

Goal 1: The Chugach National Forest contributes to ecological, social, and economic sustainability by maintaining the integrity and productivity of plan area ecosystems. This integrity is achieved when native species and habitat features of ecosystems are present and functioning...

Goal 2: The Chugach National Forest contributes to the ecological, social, and economic sustainability of the plan area by maintaining intact, resilient ecosystems and their associated services, benefits, and uses.

However, I strongly disagree with opening up more areas to logging, mining, or providing greater motorized access. I strongly believe the wilderness study area designations need to remain in place.

Motorized access

Here along the southern flanks of the Talkeetnas, virtually all have been degraded by off-road vehicles. The ORV traffic continues to increase, degrading tundra and bog areas and degrading the experience of hikers, berry pickers, and hunters who travel without motorized transport. It is virtually impossible to stop these vehicles once they push into an area.

The proposed Revised Land Management Plan, under Sustainable Recreation Opportunities, states "Recreation opportunities contribute to the health and vitality of individuals and communities by promoting physical exercise, adventure, community connections, and personal well-being." I completely agree. Trails are a great way to exercise, provide activities for kids, picnic, and increase a sense of well-being from viewing everything from dwarf willow to gliding hawks. However, when the recreation involves four wheelers, side-by-side ATVs, and mud-boggers on trails, there is very little physical exercise, the "community connections" frequently involve alcohol, and the "adventure" of getting stuck in a mud pit could be as well re-created in a designated municipal area. Indeed, the "adventure" often seem to be in how much natural landscape can be torn up and turned into mud.

It would be a terrible decision to allow greater motorized access in the Chugach National Forest. Not only are there fewer and fewer places where it is possible to enjoy non-motorized recreation - particularly sites far enough away to not be impacted by motorized noise - but to allow such in the northernmost rainforest would cause much greater erosion and impact than we see here in the Talkeetnas (which is certainly bad enough).

Under Goal 2, "Roads and trails access" the proposed Revised Land Management Plan states: "Roads and trails are safe and responsive to public needs and desires, are efficiently managed, have minimal effect on aquatic and terrestrial systems, meet Forest Service national quality standards, and are in balance with available funding."

In fact, available funding is always (and increasingly) tenuous and unlikely to be sustainably available to monitor trail traffic from Kenai to the Copper River Delta -- and when trails are available, it is always the ORVs that take over - there is no "responsiveness" to the public need to be able to hike a trail without being blasted off it by a mud-bogger.

If access is allowed, there WILL BE vehicles that cross streams illegally and erode areas in a manner that causes increased sediment in streams and degradation of water-filtering wetland habitat. There is no funding to adequately monitor areas that open up. Even here on the road system, there is no monitoring of trails. Indeed, in addition to the ATV's, there are areas that have been entirely taken over by people who use areas to shoot up old appliances - further degrading even the idea of wanting to go hiking.

* I support new trail opportunities for non-motorized access, but I do not support any new trails that could potentially be used by motorized vehicles, particularly in PWS but also including in the Front Country.

* I support Guideline MA3GL05 and 06 that trails should not be constructed, or should be decommissioned, if they are not consistent with the nature of an RNA.

* I support the ban on new permanent facilities in RNAs.

* I support closing roads seasonally or year long to meet wildlife habitat objectives. I do not support new roads for resource management activities.

Logging

Similarly, logging would necessarily be conducted on steep coastal slopes, increasing sediment into streams and coastal areas. It is likely that many areas would experience regular erosion on steep slopes that would make it difficult, if not impossible, for trees to regrow.

Mining

Mining was formerly done on a small scale in some parts of PWS. Even at these very small scale levels, some areas generated, and continue to generate, acid drainage. The comment that "Past and present mine facilities are sufficiently reclaimed to prevent or control on-site and off-site impacts to the environment and national forest surface resources" is unfounded. In fact there are several abandoned copper mines along PWS, some of which contribute copper, lead, nickel, zinc and other trace metals into streams (Stillings et al. 2008. Temporal variation and effect of rainfall on metals flux from the historic Beatson mine, PWS, AK. Applied Geochemistry 23: 255-278). There are certainly many instances of mines that have not been remediated on and off Forest Service lands nationwide.

Mining is no longer done on a small scale. Most of the new mines proposed are touted as "the largest in (Alaska, Canada, North America, the world....)". This is not because miners appreciate moving greater and greater amounts of waste to obtain economic ore, it's because the high grade material is mostly gone. A mine is first and foremost a waste-generating facility...with a little bit of gold (or zinc, or iron, etc) at the end.

There are two aspects that make mines particularly likely to discharge contaminants: 1) those located in sulfide

ore bodies (PWS is likely to contain these, although the Copper River area may contain a mix of sulfide and non-sulfide ores) and 2) high water tables or precipitation. Prince William Sound should be hands-off for any new mining projects. Even placer has the potential to be destructive, by causing increased sediment in streams if the operators are careless or un-monitored.

* I support MA4GL03 that small material sites could be developed for trail maintenance. I would support MA5GL07 sites for trail maintenance but not for road construction.

* Per MA5GL04, I do not support any mineral activity or oil and gas development. Any proposed development will, by legal necessity, say that there will be no (or minimal) impact to habitat and the natural character of an area. However, these activities detract from the current wilderness nature of the areas, they provide a negative perception in relation to the wild salmon economy, and they would cause a decline in current commercial recreational activities such as kayaking and whale-watching. Therefore they are likely to have a negative socio-economic impact in addition to negative habitat and aesthetic impacts.

* I support MA6ST06 re no authorization of new roads etc, but I do not support the clause "unless needed...to develop subsurface estate". Similar comment for MA6ST07 and MA6L02.

* I do not support MA6ST11.

* The guideline MA7GL01 should be better defined.

Additional comments

Prince William Sound and associated areas in the Copper River are nearly unique in the world - examples of locations where the human economy is integrated into the natural ecosystem and the services the ecosystem provides. Maintaining this unique relationship -- which allows for commercial fishing, recreational boating, kayaking to overnight on islands, charters for birding, and many other activities - is only sustained by an intact ecosystem. This relies on the uplands, forests, wetlands to support stream and coastal ecosystems. Too frequently, gems such as this are "loved to death" when federal agencies determine that more human access, more human pressure, can be accommodated. Do not make this mistake. The current level of human pressure can be supported. A very slow increase could possibly be supported. An increase in pressure that will come with new trails, docks, lodges and campgrounds very likely will create an unsustainable impact.

* I support a limited increase in recreational cabins and campgrounds. I do not support new lodges and boat docks. The former is in keeping with the "Wilderness" aspect of the Chugach. The latter potentially allows for the nature of the area to become more of a tourist destination than a wilderness destination. The latter is more likely to increase noise levels, the need for electricity and waste management, and other aspects more suited to road system tourism than remote wilderness.

* I support withdrawing RNA's from mineral entry.

* The Columbia Glacier should remain a wilderness study area.

Thank you for this opportunity to comment on the proposed plan.

Sincerely,

Kendra Zamzow