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First name: Michelle

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Organization:

Title:

Comments: Dear Frank,

Michelle Putz here in Colorado. I hope all is well in Alaska.

I feel that it is important that I state my concerns with this analysis, decision, and the timeframe for the comment period and the release of the EA/Draft Decision Notice.

I'll start with the timeframe for the comment period and the release of the EA/Draft Decision Notice. As you know, the comment period (6/2022) occurred years before the recent EA (3/2024) was available. With no EA in hand, it has been impossible to know what the analysis found and what was determined to be the effects of this project. With no updates in between scoping and now and this sudden push to go from scoping to decision, I strongly feel the EA provides new information that myself and the public did not receive until now (see below), thus anyone commenting on the EA, including myself, should have standing to object. I'd suggest that on a project this important, a 2-year-old scoping/comment period should not have been followed up by a very short EA and draft decision notice. To provide transparency and full disclosure and to fully engage the public, I ask that at the very least, a 30-day comment period be provided on the EA.

As to my concerns with the analysis, first, it's important to note that I strongly support the proposed action. I agree that these actions need to be done to truly support the wilderness management mission. So long as effects are fully disclosed and the public has the ability to comment on them, I feel this project should occur. But I feel that some effects are missing, I strongly disagree with other effects, and I believe this project has significant negative and positive impacts on wilderness, which therefore requires that this project be analyzed in an EIS.

Let me expand on my statements:

Missing Effects: For Executive Order 13186, Migratory Birds, there is/are no statement/s explaining why or how this project is in compliance with this executive order. In fact, with no design elements related to timing of actions or surveys to avoid effects, it is highly likely that nesting birds will be present/nesting during the "1-3 months of the summer" and that if vegetation is removed or disturbed (as it will be for road access work, thinning, and other restoration work), eggs or fledglings will be killed in the nest...that "take" will occur. Because nothing is stated in the executive order section or the wildlife section about how this project is compliant, how can we know that it is compliant and how it reaches that conclusion? I ask that migratory birds be analyzed in more detail and included in the analysis.

Incorrect Effects: I truly believe your Wilderness Impact analysis of the Proposed Action is biased because of the beneficial effects of the overall proposal. While I fully recognize the overall significant and very long-term benefits that this project will have, I think the EA is inappropriately calling the effects short-term and is overlooking the significance of the effects -both in terms of negative effects and positive effects. Five years of large equipment use in Wilderness is not short-term. Yes, five years is short over the lifespan of Wilderness and the Wilderness Act, but five seasons of large equipment and helicopter use is a long time to be working in wilderness. Five years is literally the full lifespan of many small mammals and birds (<http://www.biokids.umich.edu/critters/Glaucomyssabrinus/>, <https://ornithology.com/how-long-do-birds-live/#:~:text=Albatrosses%2C%20terns%2C%20penguins%20and%20some,and%20warblers%20%2D6%20years>). These actions may completely disturb an entire life-cycle's worth of small endemic animals from using parts of the project area. This effect was not considered or disclosed. In no other project than the 50-year Tongass timber sales would we have considered 5 seasons of actions short-term, and certainly never have considered 5 seasons of large equipment use in Wilderness short-term. I believe myself and others would say it is incorrect to state that you will have a short-term affect on the undeveloped nature of this Wilderness. This is a

long-term, significant effect that would most appropriately be decided in an EIS. Additionally, the EA shows no level/degree of effect nor provides an explanation for non-significant effects to solitude or primitive and unconfined recreation from helicopter use or the remainder of large equipment use; because of this, you cannot have a finding of no significance on this quality of Wilderness.

Related to this, the allowance of helicopters in wilderness under an EA/Decision Notice and Finding of No Significant Impact goes against past decisions on helicopters in wilderness AND sets precedence for future use. In May 2008, Dennis Bschor, the Regional Forester for Region 10 of the Forest Service decided in a Record of Decision (the decision document for an EIS) not to authorize the use of helicopters to conduct FIA inventory in the wilderness areas of the Alaska Region despite the importance of FIA data (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev2_038294.pdf). Not only did they do an EIS on, literally, helicopter use in wilderness, they decided against using helicopters in wilderness. If they did an EIS for helicopter use in Wilderness, the Cube Cove project's use of helicopters should have been considered through an EIS. And further, not only analyzing Cube Cove's helicopter use but actually authorizing it in a DN/FONSI will encourage other Forest Service districts and agencies to decide, similarly, that there is no significant effect of helicopter use on Wilderness and to make that finding in an EA/DN/FONSI. Because helicopter use in Cube Cove goes against regional precedence, in itself sets a precedence and has no logical basis for no significant effect, this project cannot be decided through a decision notice/FONSI and must move to the EIS process.

Finally, within the EA, I believe the statement, "Additionally, Wilderness Watch launched a fundraising and letter writing campaign that generated 1,648 comments in opposition of the use of heavy machinery and intervention in Wilderness," is inappropriate. This statement sounds accusatory and dismissive. No one should feel like participating in the public involvement process, no matter how, is not a worthwhile endeavor.

Thank you for your time. I appreciate the opportunity to comment. Given the new information described above as well as the lack of information available between comment period and objection period, I hope you will provide me with standing for this objection. And I hope that an EIS process and Record of Decision will be written and be successful in allowing you to implement this project.

Sincerely,
Michelle Putz