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Comments: A couple of comments regarding the management of Wilderness Areas.

1) The new management direction for cabins on Forest Service lands is inconsistent with the direction provided in ANILCA. While it is important to recognize customary and traditional uses, there is NOTHING traditional or customary with National Forest lands being "given" to individuals who have illegally established a taking of lands by installing property on it. ANILCA provides for the temporary continuation of some isolated cabins with a requirement of only a one time transfer of ownership. After the one time transfer, these facilities were required to be removed.

Just a note, even Recreation Residents, tracts offered by the Forest Service for continued recreation cabin uses, are subject to evaluations with each update of a Forest Plan, which can set a time for the removal of these facilities. There are no examples I have ever seen where the Forest Service has willingly passed ownership to someone who has established a trespass facility. (Normally, these facilities are required to be removed or, if consistent with the land designation, authorized by a permit.

2) I didn't see where you identified specific threats to Wilderness. One that comes to mind are the elk on Etoilin Island.

Elk are a non-native species that were placed on Etoilin Island in the late 1980's. The Environmental Analysis (EA) considered several location to establish this herd, with the cooperation of the Alaska State Department of Fish and Wildlife. (This was the forth attempt to establish a herd of elk in southeast Alaska; another successful herd was established years before on Afognak, Island.) The EA decided on transplanting the elk on Etoilin Island as they determined that, by doing so, they would avoid the possibility of having to manage a non-native species in an established Wilderness Area if the elk herd was put on Prince of Wales Island.

Unfortunately, this decision ignored the current Forest Plan direction at that time. Etoilin Island had been identified as a Recommended Wilderness Area in the 1979 Tongass Forest Plan. While the plan was updated in 1986, they noted that the Recommended Wilderness Areas would be managed consistent with potential for it to be designated until the land use designation was changed in a Forest Plan Update. The update to the Tongass Forest Plan began in 1988 which resulted in a draft plan issued for review in 1990. As the draft forest plan was out for its draft review, Congress passed the Tongass Timber Reform Act where the South Etoilin Wilderness Area was designated....whoops....

Not following current forest plan direction resulted in the establishment of a non-native species in the South Etoilin Wilderness Area. Going forward, I'd hope the updated Forest Plan would recognize the issues with the management of this species and not extend any addition protections to protect or enhance the population beyond what is already provided by the State of Alaska in allowing elk to be hunted. (If they migrate to other locations beyond Etoilin or Zarembo Island, they can be killed in any hunting season.)