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Comments:

Terri Marceron

Forest Supervisor, Chugach National Forest

Attn: Draft Land Management Plan

November 1, 2018

Dear Supervisor Marceron:

We are a group of landowners with property in Jack Bay, some 15 miles by water south of Valdez. Our properties in the state homestead area are surrounded by, and in certain cases abut CNF lands. We have worked with CNF staff on a variety of conservation issues over the past three decades and appreciate your professional, thoughtful collaboration as we have attempted to help maintain the outstanding wilderness quality of Jack Bay, in particular, and the entirety of Prince William Sound. Indeed, we have a great deal to be grateful for with a "backyard" containing so many exceptional natural qualities!

Thank you for the opportunity to comment on the Chugach National Forest Management Plan revision. You and your staff have clearly invested a huge effort in this planning process and take seriously your important role as stewards of this unique public resource. We applaud and thank you for your vision and your efforts.

It is also apparent that you are negotiating challenging compromises, as you balance conservation on one hand versus increasingly consumptive recreational and commercial uses of the Forest on the other. In general, we approve of what seems to us to be the proper hierarchy: first, protect outstanding, existing natural conditions and ecological integrity over a long time frame and second, allow an appropriate diversity of private and commercial uses to occur at sustainable levels so as to achieve social and economic goals. Without this nested prioritization, the concept of "sustainability" is rather meaningless, and devolves into "sustained deterioration" when a plan attempts to be all things to all stakeholders. Again, we applaud your strong conservation priority, and believe this to be entirely appropriate, given the exceptional natural conditions that continue to exist across much of CNF.

We submitted comments on the early stages of this Forest Plan revision on June 1, 2015 (attached), in which we requested that you emphasize ecological sustainability first, followed by prioritizing less consumptive and traditional uses of the Forest over more consumptive and new, often damaging uses (such as helicopter and snow machine recreation). New commercial permits often displace larger numbers of individual, private recreation and subsistence users. Hence, our rationale is not only personal preference, but the observation that existing natural ecological conditions and recreational and subsistence opportunities are not sustainable in the face of ever-growing levels and intensities of use, often coupled with new technology (GIS technology, lighter and more powerful snow machines, helicopters, etc.) We are pleased to see that the Draft Plan incorporates these ideas, especially in Alternatives "C" and "D".

We favor Alternative "D" because we believe that it best conserves the remarkable, outstanding natural qualities that currently exist across most of CNF today, striking the most sustainable balance of enjoying Prince William Sound today and protecting it for posterity to enjoy as well, still in a largely undiminished state.

Specific Comments

1. We strongly approve of maintaining "Backcountry, semi-primitive, and winter non-motorized designations" for the entire Jack Bay watershed, extending logically through applicable portions of Port Fidalgo and Port Gravina, east toward Cordova.

The alpine terrain throughout the Jack Bay watershed offers exceptional backcountry skiing and climbing during the spring time, and is used by both Jack Bay landowners and (via Solomon Gulch) Valdez residents. For over twenty years we have requested that this area remain off limits to snow machine and heli-skiing because this motorized recreation profoundly alters the solitude and aesthetic qualities we seek when we venture into this steep, snowy terrain. Snow machine and helicopter traffic also impacts sensitive wildlife that use these alpine and subalpine areas. Mountain goats are common here, and travel between the Mt. Denson and North Jack Bay herds during March and April. Wolverine also use this high country regularly, and brown bears travel between the heads of Port Fidalgo and Jack Bay beginning in April. We encourage CNF to continue working with Valdez snow machine groups to publicize the non-motorized designation of lands above Solomon Gulch, and recommend conspicuous signage be placed at the trailhead. Valdez offers abundant state land that is open to snowmachine use, but there is increasingly little country accessible for multi-day ski mountaineering trips where snow machines and/or helicopters are not encountered.

2. We remain concerned about the long-term decline of brown bears and the more recent and precipitous decline of black bears in Jack Bay. The latter appears to be occurring across all of PWS.

Both brown and black bears were present and readily visible on all the major drainages in Jack Bay in the 1980's through 1990's. This has changed markedly: brown bears are now seldom seen anywhere along shorelines, and are even hard to find fishing for salmon on the Naomoff River 0.5 miles upstream from the intertidal, where they used to be common. For those of us who travel the shoreline and hike regularly around Jack Bay this change is striking and disturbing. ADF&G records show that over 135 black bears were (legally) harvested in Jack Bay over a period of approximately 14 years (Charlotte Westing, pers. comm.). Jack Bay is among the most heavily visited areas out of Valdez, with thousands of visitors in small boats cruising the shoreline, fishing, and sightseeing. The Jack Bay USFS public use cabin is occupied steadily from May through September, with bear hunters comprising the bulk of early and late season users. Unfortunately, decades of intensive, focused hunting in the salt marsh of the Naomoff (Jack) River has depleted and/or shifted bear behavior so that visitors who specifically want to see bears, as well as the general public who are thrilled by chance sightings, are no longer able to enjoy this iconic experience.

While this is in large part the responsibility of ADF&G to address, as the land manager, USFS can and should do their part to address this serious issue, both in collaboration with state biologists, and independently. We suggest that CNF public use cabins which are sited close to critical spring time bear habitat be closed to public use during the spring (and possibly fall-) bear hunt, so as to reduce the pressure on this important wildlife species, and balance non-consumptive uses with hunting. The current trend does not provide for sustainable wildlife viewing or conserve the natural/historical biodiversity of these apex predators.

One approach as the demand for both hunting and wildlife viewing increases with increasing visitation would be to work with ADF&G to disperse hunting into more remote parts of PWS and protect bears in popular, accessible viewing areas where the public can reasonably expect to see bears in near-natural numbers in their preferred habitat. Closing the Jack Bay Cabin would probably reduce the number of bear hunters and the number of bears taken in Jack Bay; hunters must be considerably more dedicated to camp in inclement conditions compared to staying in a warm cabin 0.25 miles from the largest salt marsh and highest quality spring brown bear habitat in the area. Conversely, throughout the remainder of the summer, other visitors would be more likely to have opportunities to view brown and black bears on the Naomoff and other salmon streams around Jack Bay. This approach would seem to be a highly specific, substantive suggestion supporting Plan goals:

Desired Conditions for Goal 1: Provide for Ecological Sustainability

FW-G1-DC-18: Terrestrial species composition, distribution, genetic diversity, abundance, and reproductive resilience are characteristic of the terrestrial setting and disturbance regimes of the geographic area where they developed. (p. 19)

3. In addition to supporting the largest extent of Wilderness Study Area for the western Sound, we are particularly concerned about the future of Glacier Island and the Columbia Glacier vicinity. Many of us use this area extensively for recreation and subsistence, and would strongly prefer to see it remain as natural and un-commercialized as possible. We support retaining Glacier Island in the WSA, and encourage CNF to negotiate

with Tatitlek and Chugach Alaska Native Corporations to reduce the threat of incompatible development that would detract from the wilderness qualities of this dramatic landscape. Growler Island, Heather Island, and mainland holdings would be excellent additions to CNF, and we encourage managers to pursue these lands before development projects are initiated.

Chugach Alaska Corporation holdings on Knight Island are another area of special concern, given the exceptional scenic, recreation, and wildlife values found among the mountains and bays of this dramatic island. Elrington Island is another area some of us are familiar with, another factor favoring Alternative "D" so as to retain this lovely island with excellent anchorages and fine scrambles in the WSA.

4. Management Area 6 - EVOS acquired lands. Desired Condition number 3 states that "Resources affected by EVOS are restored or enhanced, and intact fish and wildlife habitats are maintained on all lands acquired with EVOS Trustee Council funding, subject to valid existing rights". The draft Management Plan (EVOS Objectives, p. 51) recognizes that land exchanges or acquisition may be necessary in order to achieve the desired conditions of EVOS acquired lands in the event of subsurface development. However, in the event willing sellers or land exchange is not an option we would like to see compensatory mitigation included in the plan so as to offset temporal ecosystem functional loss due to the anticipated degradation of habitat conditions within the surface estate. Compensatory mitigation may include many forms and we encourage you to look at the Regional Mitigation Manual - MS 1794 - prepared by the Bureau of Land Management 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.

5. Finally, we support the Forest Service in its proposal to assign and manage a majority of Prince William Sound under the Very High Scenic Integrity Objective. The Sound's scenic values are world class and the assignment of the Very High Scenic Integrity Objective will help to ensure this outstanding resource is protected and maintained for many years to come.

Again, we thank you for considering our views, and appreciate the good work CNF staff has invested in this important planning document.

Sincerely,  
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Cc:

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