

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER

RICK R
TONY KNOWLES, GOVERNOR

550 West 7th Ave., Suite 1400
Anchorage, AK 99501

PHONE: (907) 269-8431
FAX: (907) 269-8918

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Dave Gibbons, Supervisor
Chugach National Forest, USFS
3301 C Street, Suite 300
Anchorage, AK 99503-3998

Subject: DNR Comments on Initial Alternatives, CNF Revision

Dear Mr. Gibbons:

The various divisions within the Department of Natural Resources have reviewed the six preliminary plan alternatives in response to a request from your staff to identify issues of importance to the department.

One of our concerns is to ensure that at least one of the six alternatives addresses issues of importance to DNR. We found that our concerns were covered in at least one alternative. We preferred the "moderate" alternative, prepared by the three ranger districts, listed as Alternative 3. DNR follows a balanced multi-use resource orientation. While DNR is not recommending this alternative at this time, the concept of a balanced multiple use of land and resources is recommended by DNR for application in the eventual Forest Land Use Plan.

General Comments:

- Please refer to our letter of December 17, 1997 that describes our concerns over certain issues. Many of these remain valid. In particular, refer to the discussion on our preference for prescriptions that allow flexibility in management and use. Our statements on the designation of rivers under the Wild and Scenic Rivers Act remain valid, as do those pertaining to the ability to provide for extractive activities (mining and forest products) at appropriate locations in the National Forest. DNR also remains concerned about effective coordination between state tideland and upland designations in the two DNR area plans and the upland prescriptions to be used in the Chugach National Forest Plan.
- "Focused" Plan Alternatives. DNR recommends that the next iteration of plan alternatives include alternatives that are more "focused", feasible to implement, and reflect the most probable development/protection areas. These patterns should emerge from the review of the public and agency comments received on the six draft alternatives that DNR and the public reviewed.
- *Mining Exploration and Development.* Generally, DNR encourages the use of those prescriptions that provide for mineral exploration and development, assuming that the mining activity can be developed to be compatible with the recommended prescriptions for a particular area of the National Forest. We also recommend prescriptions on existing, valid claims within the WSA. The mining industry is concerned such operations be allowed to continue, subject to appropriate restrictions.

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Specific Comments:

- *Seward Highway.* The planning for this feature ought to be guided, at least in part, by the Scenic Highway Corridor Partnership Plan (CPP) and the DNR Kenai Area Plan. The Kenai Area Plan used a framework established by the CPP to determine management intent for areas of state land along the Seward Highway. The CPP recognizes three types of roadway development: Nodal Development Areas, Corridor Development Areas, and Corridor Preservation Areas. The CPP does not designate categories of development for specific locations, but leaves the application of the categories to the planning efforts of the partners in the CPP, which includes both the United States Forest Service and DNR. The Kenai Area Plan (KAP) applied these categories of development to state lands along the Seward Highway Scenic Byway. An attached document explains the relationship of the CPP to the KAP, and details the categories assigned to each of the state-owned units along the Seward Highway Scenic Byway.

In addition to the guidance given on design in this plan, DNR supports the use of a flexible CNF prescription such as Recreation, Fish and Wildlife (RFW), in order to respond to unexpected development needs in other areas of the road corridor. We recommend that the RFW prescription extend one mile either side of the highway.

- *Manitoba Mountain.* For a number of years, conflicts have occurred between non-motorized users and motorized users in the Manitoba Mountain area. The management intent in the Kenai Area Plan is for dispersed recreations use, as it is in the USFS plan. Because the unit would be managed the same, whether DNR or USFS manages it, and because of the conflicts associated with the unit, DNR has assigned the selection the lowest possible priority for conveyance. Because the state has overselected its entitlement, it is very unlikely that the state will receive patent for these lands.
- *Forestry.* The Division of Forestry (DOF) is concerned that the CNF Plan provides a mixture of Forest Restoration and commercial timber for small operators. With respect to the former, from our perspective it is necessary/appropriate to use the Forest Restoration prescription where bark beetles have affected an area(s). It is also appropriate to use this type of prescription if they are likely to affect other areas, or for other forest health reasons. The forest should be managed to improve tree vigor, so that the risk of future landscape level infestations is reduced. Further, forest management is important in areas identified as viewshed, especially along the highway corridors. Additionally, the plan should address reducing fuel loading, resulting from the spruce beetle caused tree mortality, by removal of dead, infested or high risk trees near community developments and areas designated "Critical" under the Fire Plan. We also believe the plan should accommodate a small, but reasonable level of commercial timber harvest. The plan should establish a stable timber sale offering program so that local industries dependent on public timber can rely on a specified volume on a scheduled basis. This should be minimally 2 MMBF.

In general, DOF wants there to be flexibility in the CNF to accommodate forest management and commercial timber harvest.

- *Campground and Related Recreational Facilities.* DNR recommends the use of a prescription, either RFW or a similar prescription, that will provide the opportunity for additional recreational facilities along the Seward Highway corridor if necessary. We have experienced increasing levels of RV use, and the one state site that is available for this use is substantially over capacity.
- *Backcountry Areas.* The higher elevation areas are currently used for recreation, which is mostly non-motorized in nature, with a winter exception allowing snowmobiling in certain areas. DNR prefers that recreation prescriptions be applied to these areas as opposed to the Recommended Wilderness prescription shown in several alternatives. The former provide capability to develop supporting recreation facilities, while the latter is limited in the number and type of allowable uses. Nor does the Recommended Wilderness prescription provide for increasing levels of backcountry use. If the

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Recommended Wilderness prescription is used in the Kenai area, DNR recommends that it be applied to very remote areas having little existing recreational use and little potential for increasing recreational use in the future.

- *Access to Native In-Holdings.* Access is required from the Seward Highway to the Native corporation holdings east of Seward. Access is now shown as "trail", but this level of access may be insufficient to meet the needs of the corporation. We recommend that you consult with the Native corporation to determine the proper category of access to apply in the Preferred Alternative.
- *Coordinated Management with State Land.* DNR recommends that the Preferred Alternative use prescriptions adjacent to state land that are coordinated with the management designations of the DNR Kenai Area Plan. This document has gone through the "Public Review Draft" (PRD) phase and is intended that we will develop the Intent to Adopt Draft shortly. The management intent statements and designations are identified by specific tracts in Chapter 3. Please talk to Bruce Talbot (269-8536), RADS, if there are any questions on specific parcels. A copy of this plan is attached.
- *Bear Core Area Management Prescription.* DNR recommends that the preferred alternative reflect the recommendations of the Brown Bear Task Force, which are due this fall. Please contact Dick Mylius (269-8532) if you have any questions on this issue.
- *Recommended Prescriptions.* Generally, DNR prefers the use of prescriptions that provide as much flexibility as possible within the overall management intent for an area, while accommodating specific habitat protection or resource extraction needs. Use of the RFW, or the "backcountry" prescriptions are appropriate within the mountainous areas of the Peninsula. These are recommended since they convey the management intent of recreation with habitat protection, while allowing the flexibility for other types of non-recreation uses to occur. The Resource Development (RD) prescription is generally not recommended for use in this area, unless necessary to meet the limited timber sales volume mentioned above or to provide for specific economic uses. In some of the backcountry areas the Forest Restoration (FR) prescription is recommended in order to meet the objectives for forestry management described above. The Division of Forestry is developing maps depicting the areas where the FR prescription should be applied. When completed, we will send them to you.

Portage Area

- DNR does not support the use of the Wilderness River prescription in the Twenty Mile or Placer River drainages. These areas have been used for hunting, fishing, and other purposes over, at least, the last 25 years. We want these activities to continue. Because of the high level of existing use, particularly in the Twenty Mile, it is inappropriate to impose the high level of protection afforded by the Wild River designation. Preferred alternative prescriptions for these areas would be RFW or Recreational River. Both provide flexibility in meeting increasing recreational demand while maintaining the natural character of both areas.

Prince William Sound - Wilderness Study Area (WSA)

- *Recreational Emphasis within Prince William Sound.* DNR supports a very strong recreation emphasis throughout the Wilderness Study Area (WSA). We also agree that a high level of protection should be afforded to this area, except to accommodate increasing recreational demand. However, we are concerned that the Wilderness prescription may make it difficult to accommodate increasing recreation demand. If the Wilderness prescription is identified in the Preferred Alternative, the CNF Plan text should recognize the need for limited recreational facilities at certain locations, as described below. If the

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Preferred Alternative provides for a mixture of prescriptions within the WSA. DNR recommends the use of the Backcountry and Backcountry Group prescriptions to accommodate the specific locations of tidelands/uplands development.

- *Upland Support Facilities near Whittier.* DNR is concerned about the ability to provide necessary upland support facilities at specific locations within 30 nautical miles of Whittier. Our state park facilities within this area are incapable of meeting this demand and are inappropriate for the siting of more intensive uses. Because of this expected demand, it is important that some upland sites within the National Forest include prescriptions that allow recreation support facilities. (Note: there are several state parcels located on the north shore of Passage Canal classified in a development category that may be able to accommodate some type of support facilities.) The most needed "support facilities" are areas for docking with access to the uplands; the development of boardwalks associated with the docking areas; additional areas of hardened campsites for kayakers or zodiac users; and, occasionally, areas for upland lodges or similar facilities.
- *Use of Backcountry Prescriptions for "Spot Development".* Given the probable continuation of the Wilderness Study Area (WSA), only those uses of small scale and nominal impact are appropriate. These types of facilities should be allowed, even if the Wilderness prescription remains. Based upon our discussions of this issue, we would recommend the use of the Backcountry Group or "backcountry" prescriptions at specific, appropriate sites. If the Backcountry Group prescription is preferred, DNR recommends that the "maximum party size" within the Recreational Opportunity Spectrum (ROS) be identified at 100. The ROS does not now identify a specific size threshold for the Backcountry Group prescription. In the event that other types of prescriptions are recommended within the WSA area, DNR suggests that specific sites adjacent to tidelands be identified for "spot" development. These sites should be designated RFW, Backcountry, or Backcountry Group.
- *Limited State Land to Support Development.* DNR agrees that development should first concentrate on the non-public lands, except if an EVOS acquisition precludes this. Further, it is unlikely that state land can be used to support development within the WSA, except at the two sites already mentioned. State uplands in the WSA are very limited, with development (other than Passage Canal) authorized only at Esther Island. DNR is in the process of issuing an ILMA to State Parks for the only other possible site, at Perry Island. Because of our sparse holdings, limited upland development needs to occur on Forest Service land inside the 30 mile radius from Whittier, to accommodate the expected recreational demand caused by the road opening. If adequate land is not set aside for upland uses, recreational providers will increasingly pressure DNR to accommodate their needs with floating facilities on state tidelands.
- *Knight Island.* DNR recommends that Knight Island be designated as a "Backcountry" prescription area, rather than "Wilderness". The former provides more flexibility in responding to unexpected recreational use. We concur with the use of a RFW or similar prescription in the area adjacent to the two major bays on the north tip of this island.
- *Recreational Opportunity Spectrum.* DNR is also concerned about the group size caps in the ROS. They seem unduly low for day use vessels since they carry around 100 people. The Wilderness prescription sets the cap at a maximum party size of 15, which precludes the use of shorelands by day use vessels. See previous comments on the use of Backcountry Group or Backcountry prescriptions.

Prince William Sound - Central and Eastern

- *Re-evaluation of Selections.* We are re-evaluating our selections, especially on Hitchinbrook Island adjacent to Boswell Bay. DNR would like to work with the Forest Service on these selections, to determine which should remain and which should be relinquished.

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- **Balanced Approach to Motorized and Non-Motorized Uses.** A balanced approach to non-motorized and motorized uses is preferred. We understand that discussions on this issue are continuing with the affected parties, and it is uncertain just how the final details will fall out. However, DNR recommends that some parts of Hitchinbrook, Montague and Hawkins Island be used for motorized vehicles as well as areas east of Cordova along the Copper Highway. Areas that have been used historically, that permit motorized uses and are used currently, are appropriate for motorized uses.
- **Commercial Floating Facilities.** DNR is preparing an evaluation of bays in the central, southern, and eastern parts of Prince William Sound (PWS). It focuses on their suitability for the various uses that we permit, especially commercial floating facilities. There needs to be close coordination between the two agencies on developing the prescriptions for the adjacent uplands, to ensure that upland conflicts do not occur. DNR will send you a draft on this document as soon as we complete the remaining habitat evaluations. Based on staff discussions, we recommend that upland sites adjacent to bays identified as moderate or high potential in the suitability analysis have a compatible upland prescription. A similar approach to that used in the western sound would be applied. That is, a "spot" prescription of Backcountry or Backcountry Groups should be identified in the Preferred Alternative.
- **SUP Lodges.** We are not certain how the "SUP designation lodges" in the Prescription Matrix will be applied in the plan. According to the matrix, such uses are not allowed in the restrictive categories of wilderness and some forms of backcountry use. If development of upland lodges is determined appropriate, to reduce pressure on state tidelands, this matrix needs to be revised or prescriptions used that accommodate compatible upland development. As written, it would preclude development in areas of the southern and eastern sound, depending on the prescriptions chosen by the Forest Service.
- **Backcountry Motorized.** DNR concurs with the use of the Backcountry Motorized (BCM) or the RFW prescriptions on Montague, Hitchinbrook and Hawkins Islands and in portions of the mainland east of Cordova along the Copper River Highway. Motorized use has occurred or now occurs in each of these areas. Both motorized and non-motorized uses need to be accommodated in the eastern sound, and these seem to be the most reasonable locations for motorized uses — particularly since summer ATV use has already occurred in these areas. Additional areas of BCM use may be appropriate near existing use areas, including Tasnuna, Barrier Islands, Alaganik Slough and Pete Dahl.
- **Backcountry Prescription Recommended in Areas North and East of Cordova.** DNR recommends the use of the Backcountry prescription in the mainland north of Nelson Bay and west of the ANILCA affected area. The principal management orientation of this large area should be recreation, with an associated management intent to protect natural resources, wildlife, and associated significant habitats. We object to management orientations that solely emphasize habitat and wildlife protection at the expense of recreational activities.

Sincerely,

Marty Rutherford
Deputy Commissioner

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