

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SEAN PARNELL, Governor

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February 8, 2012

Mr. Tim Charnon, Glacier District Ranger
U.S. Department of Agriculture, Forest Service
P.O. Box 129
Girdwood, AK 99587

Dear Mr. Charnon:

The State of Alaska reviewed the U.S. Forest Service, Glacier Ranger District (District) proposed action for campsite management and development on Forest Service lands in western Prince William Sound (PWS). This letter contains the consolidated scoping comments of the State's resource agencies.

The District's proposal to harden, improve, remove, and/or restore campsites in Prince William Sound is a positive development. We understand the Service will be developing an Environmental Assessment (EA), which will be released for public review and comment. Given the level of use in western Prince William Sound and the limited accessible camping sites, we support campsite hardening and improvement to maintain resources and facilitate public use over closures.

Management of campsite closures

While some campsite closures may be necessary, we encourage the District to use education and adaptive management to minimize the need for closures. These approaches can address various resource issues, such as litter, human waste, fire rings, vegetation impacts and soil compaction and erosion. We request that the District describe the specific reasons for removing and restoring 15 campsites in the Campsite Management EA. These campsites were likely created by anglers, hunters, boaters, and kayakers because their locations were suitable for camping and provided access to resources. For removals to be successful the District will need to provide new sites in the area, or people will likely just return to the old sites. Providing the public with information about campsite availability and locations will help ensure that recreational use primarily remains at established campsites. Periodic monitoring would be useful in determining the project's effectiveness.

Campsite closures in Port Wells and Knight Island area

The proposed action removes at least four campsites along the east side of Port Wells and four campsites along the west side of Knight Island without providing alternative campsites. We are

particularly concerned with the removal of these campsites as there will no longer be any campsites along this entire stretch of shoreline.

Potential firearms restrictions

We are concerned that the District could impose a prohibition on the discharge of firearms within a certain distance of improved campsites, which would conflict with hunting in the area. We request that no firearms restrictions be imposed at any campsites.

Fish resources

Freshwater streams and marine waters within the vicinity of many of the proposed campsites support pink, chum, and coho salmon populations. The establishment of permanent campsites near these freshwater streams has the potential to increase sport fishing pressure on these stocks. There are currently no conservation concerns for the pink and chum salmon stocks in these areas and the Alaska Department of Fish and Game actively monitors these stocks in-season to ensure their sustainability. The few wild coho salmon stocks in the vicinity of the proposed campsites have late season runs (late August through October) after peak recreational use, so increased sport fishing pressure on these stocks is not expected to be a conservation concern. The scoping letter states that beach gravels will be used to harden campsites. Due to fish spawning concerns, we request the Forest Service not use gravel from any streams or inner tidal areas near streams.

Wilderness

Many of these sites are within the Nellie Juan-College Fjord area recommended in 2002 for wilderness designation, and all are within the Nellie Juan-College Fjord Wilderness Study Area (WSA) mandated by the Alaska National Interest Lands Conservation Act. Hardening and improving these dispersed campsites meets the management intent for both the recommended wilderness and the WSA as described in the 2002 Chugach National Forest Revised Land and Resource Management Plan.

Thank you for this opportunity to comment. Please contact me at (907) 334-2563 if you have any questions or need assistance contacting a state agency representative.

Sincerely,



Nina Brudie
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator
Christopher Stinson, Glacier Ranger District