

# *SAR - Forest Plan - Chapter 3 - 213*

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0021011-001

As the Cordova District Fishermen United (CDFU) members have pointed out, the protection of the valuable renewable resources of Western Prince William Sound and the Copper River Delta and Flats are of prime concern, as are the socioeconomic elements of the Plan. Thousands of men and women make their livelihoods from these renewable resources and they in turn feed and provide shelter to hundreds of thousands of others. With common sense both can be accomplished.

I wholeheartedly agree with the approach adopted by the CDFU members in supporting a 501 (b) 2 prescription from Category II for the Chugach Forest Plan and sincerely ask for your support in this also.

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0021013-001

The seafood processing industry has existed in Prince William Sound and on the Copper River for 100 years. It continues to be the primary economic base for the area's economy.

For all of those years, the seafood industry has been a jealous protector of fisheries habitat. The residents of the area, many of whom are direct participants in the industry and all of whom depend upon a continuation of the seafood industry to support the local communities, have a substantial stake in the unique areas of Copper River and Prince William Sound. This pristine area is essential to a continuation of the recreational and commercial activities that we enjoy, and our comments on the proposed designation of the Chugach forest as Wilderness area should be understood in the context of our desire to continue and enhance the wild resources and habitat of our area.

The industry, as a group) will continue its work to support the protection and perpetuation of the area fisheries and their habitat in Prince William Sound and the Copper River. With the exception of the proposed Wilderness designations, we believe that the current management system in the Chugach Forest has satisfactorily enhanced the ecosystem of the area. We are opposed to placing this area under the Wilderness designation for the following reasons.

1) A Wilderness designation complicates the consideration and implementation of many environmentally compatible projects due to the additional work burden and expenses associated with that designation.

2) The term Wilderness is a moving target in the eyes of the public and Congress, and if either of them changes their perception of the term, there could be long term dire impacts to our fisheries and their habitats.

3) The Glacier Bay lawsuit could impact management of the Chugach, and potentially any Wilderness designation. If the court finds that federal management applies not only to navigable waters in National Parks, but to Conservation System Units as well, management practices such as those precluding commercial fishing in Glacier Bay will also apply to Wilderness designations in the Chugach.

4) Under Wilderness, the ability of the USFS to monitor, maintain and if necessary, manipulate habitat are at risk due to potential litigation, We do not support a Wilderness designation or any Category 1 prescription in areas of important fisheries habitat as this classification is so restrictive that a manager's flexibility to deal with critical habitat issues could be severely limited.

We would support a 501(b) 2 prescription from Category 2, the next most restrictive category for Western Prince William Sound and the Copper River Delta and Flats. "The conservation of fish and wildlife and their habitat shall be the primary purpose' of the 501(b) prescription. This designation, while being somewhat restrictive, will give the balance that is consistent with the protection of fisheries habitat while allowing continued access to the commercial fisheries

0021775-001

I would like to see Martin River left as part of 501 B2. I have used this area and access being so limited due to environment and limited now to such few people that it should remain in this classification so at least some people may use it. Access to any areas in Cordova does not need to be restricted as the difficulty of the environment dictates minimal impact.

0021777-001

You have Copper Sands on the Copper River Delta as a [Illegible] Research Natural Area. I would like to see that Chugach back to ANILCA 501 (b)-2 prescription [Illegible] with motorized [Illegible]. There is really now need to have Copper Sands as a Research Natural Area, the only reason that [Illegible] present to me was they wanted it for research. Well research has [Illegible] on for years on the Delta and will continue unimpeded. I personally know of two different College students who did research on the Copper River Delta and they didn't need a Designated Research Natural Area to do and complete their work.

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0021791-001    I would support continued management of the lower Copper River Delta much the same as in the past - I favor 501 - b(2) management prescription for the area.

0022537-001

I am a commercial salmon gillnet fisher person in the C. R. D. and P. W. S. area. 10 yr. resident of Cordoba and 19 yr. resident of Alaska.

I strongly oppose any 'wilderness' designation for the C. R. D. and P. W. S. I believe the current U. S. F. S. management plan is working well and I feel a 'wilderness' designation would limit or include my traditional access and use of the C. R. D. and P. W. S. for my livelihood as a commercial fisher person along with my ability to subsistence hunt and fish.

If I had to make a revision plan choice I would support the 501 (6) 2 prescription from category II.

0022537-002

If I had to make a revision plan choice I would support the 501 (6) 2 prescription from category II.

0026869-002

I believe the position outlined by Cordova District Fishermen United protects my family's interests and urge the Forest Service to finalize a 501(b) 2-management prescription for this area.

0029113-003

This benefits both our fishing and tourism economy, I do not think that 501 (b) 2 provides adequate protection from the very real threat of clear cuts, oil and gas production, coal mines, and large scale tourism.

0026297-001

As a citizen of Cordova, who has made this home for the past 22 years, I am speaking in favor of the US Forest Service's current 501(b)2 proposal as the best Plan for the Copper River Delta.

0026654-001

I've not changed my stand since this procedure started. The 501B prescription 2 on the east side of the Copper River is what I've pushed for. That means no Recommended Wilderness prescription or the Scenic River designation. Both are a Congressional Designation, which lock it up forever.

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0026764-001

To summarize the resolution, the Cordova City Council supports management of the Copper River Delta under the 501 (b)2 management prescription, whose primary purpose 'is the conservation of fish and wildlife and their habitat.' The Council does not support 501 (b) wilderness or scenic river designation for any of this area.

CITY OF CORDOVA, ALASKA  
RESOLUTION 04-00-21

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CORDOVA,  
ALASKA TO SUPPORT THE PROTECTION OF THE FISHERIES RESOURCE  
AND HISTORIC COMMERCIAL FISHERIES' ACCESS TO IT IN THE USFS  
PLAN REVISION PROCESS

WHEREAS, the commercial fishing industry is the social and economic base for Cordova; and

WHEREAS, locally the industry contributes on average more than 70 million dollars yearly to the economy of the State of Alaska, and directly or indirectly employs 75% of Cordova residents; and

WHEREAS, the sustainable management, enhancement and harvest of commercial fish is dependent on our ability to continue to utilize the Chugach National Forest in ways that are consistent with traditional use of these areas; and

WHEREAS, the U.S. Forest service is preparing to adopt a new forest management plan that may change the management designation of areas in the Chugach National Forest, possibly affecting some of these traditional uses by designating these areas as 'Wilderness'; and

WHEREAS, wilderness designation complicates the consideration and implementation of many projects that directly affect fisheries, potentially impacting this important industry,

NOW THEREFORE BE IT RESOLVED, That the City of Cordova joins with the Cordova District Fishermen United and area processors in requesting that this area be designated under the 501(b)2 management prescription, whose primary purpose 'is the conservation of fish and wildlife and their habitat.'

PASSED AND APPROVED THIS 5th DAY OF APRIL, 2000

0027025-001

I am writing to you in opposition of Wilderness classification for the Copper River Delta and any lands that may be important to fisheries habitat. I support the Cordova District Fisherman United and the City of Cordova in there favor of 501(b) 2 management.

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- 0027575-005    Problems with the ANILCA 501 (b) category 2 prescription for the east & west Copper River Delta.
- I am against the preferred alternative, ANILCA 501 (b) category 2 management prescription for the east and west Copper River Delta. This prescription allows for increased human use infrastructure, including parking lots, boat docks and landings, new trails, campgrounds, viewing sites, electric utility corridors, new cabins, and oil drilling, mineral development, and transportation on public lands. All of these uses introduce incremental degradation and elimination of fish habitat through erosion, stream blockage, sedimentation, and introduction of hazardous wastes and toxic substances into the natural environment. At the same time, this alternative promotes large-scale tourist development and more roads, both activities that can be detrimental to wildlife.
- 0027601-006    I must therefore weigh in in favor of a 501(b)2 prescription for the southeast Copper River Delta.
- 0027613-001    Thankfully, this effort has been largely successful due primarily to the wonderful undeveloped nature of the delta and that wild Copper River system that sustains and perpetuates a healthy run of wild salmon. But, now I am afraid, that because of what seems to me like local paranoia, manifest in an attitude of suspicion of big government and a belief that government will drive out the fishing interests and exclude existing local resource users from their customary uses of the Copper River Delta, a few voices in the Cordova community have succeeded in creating the appearance of widespread opposition to a wilderness prescription for the Copper River Delta. I personally do not believe that this attitude truly represents what the typical resident feels. Fear of government intervention is the motivating factor in most folks' support of the 501b2 designation, though in their hearts I believe that they would support wilderness if the customary and traditional uses are written into such a prescription as has been suggested.
- 0027629-001    I strongly oppose any wilderness designation for the Copper River Delta.
- I believe the position outlined by Cordova District Fishermen United protects my family's interests and urge the Forest Service to finalize a 501(b) 2-management prescription for this area.

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0028130-001

I support the proposed '501 b-2' management prescription for the eastern Copper River Delta. This designation, first and foremost, meets the standards put forth by the civic and industry leaders of Cordova as well as the explicit desires of a significant majority of the people who live here.

. Further, the proposed 501-b wilderness prescription has so compromised the meaning of wilderness that the prefix 'wild' is arguably understated. The first time a determined wilderness advocate encounters a determined airboater, any remaining ambiguities will be resolved. Congress has given us clear direction on management of the Copper River Delta as well as definitions of wilderness and 'ANILCA wilderness'. Regardless of how we configure yet another definition of 'wilderness', it would clearly be in conflict with the congressional mandate.

Within our support for the '501 b-2' designation is the conviction that our forest managers must have adequate resources if they are to effectively meet the demands of the future and manage in the face of uncertainty. Cordova is a fishing community and as such, we have a profound gratitude for the long history of Forest Service habitat

restoration and enhancement activities in support of our fisheries.

Wilderness or other restrictive designations that limit habitat manipulation to that conducted with handtools and other primitive techniques will effectively preclude meaningful fisheries projects. In addition, and in spite of permissive language specific to other wilderness designations in the national forests of Alaska, fisheries projects have become lightning rods for appeal or litigation by those who question the compatibility of such activities with the values of wilderness. These realities effectively elevate the cost of doing business to the point where it is no longer possible for the Forest Service to justify fisheries projects in 'wilderness' areas. The current 501-b 'wilderness' prescription should be more forthright in this regard.

0028132-001

As a concerned commercial fisherman and after review of this situation, would like to support CDFU and the City of Cordova position on this matter. 501(b)2 seems to be the most viable for all concered.

0028312-003

-- CDFU supports a 501 (b) 2 prescription from for Western Prince William Sound and the Copper River Delta and Flats.

0028319-001

I am very concerned that the 501(b)2 proposal does not adequately protect the Copper River Delta and surrounding region from industrial pressures. Instead, I strongly support a wilderness designation that allows continued recreational and subsistence use of this region, as well as continued commercial fisheries without interference.

0028400-001

I support the proposed '501 b-2' management prescription for the eastern Copper River Delta.

Within our support for the '501 b-2' designation is the conviction that our forest managers must have adequate resources if they are to effectively meet the demands of the future and manage in the face of uncertainty. Wilderness or other restrictive designations that limit habitat manipulation to that conducted with handtools and other primitive techniques will effectively preclude meaningful fisheries projects.

0029151-001

I serve as a board member for Cordova District Fishermen United (CDFU), I just wanted to drop you a note to tell you that I still support 501 B 2 and not Wilderness, I have been the chair of the Gillnet division for the past 5 years. Thank you for all the work you've done and for making the visits to Cordova.

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0029164-001    I am writing to voice my support for the Cordova District Fishermen United's position opposing wilderness, and favoring 501(b)2 management of important fisheries habitat and historic use, especially on the Copper River delta.

I have been commercial fishing in Prince William Sound and the Copper River delta for 15 years, and believe that the 501(b)2 designation is consistent with the needs and goals of both the communities in Prince William Sound and the US Forest Service.

0029170-001

I support the Cordova District Fishermen United and the City of Cordova's positions of opposing the wilderness designation and supporting 501 (B) 2 management of important fisheries habitat and historic use, in regard to the Chugach Forest Plan Revision.

0029063-004

We are concerned that the proposed Alaska National Interest Lands Conservation Act (ANILCA) 501(b)-2 prescription in your preferred alternative allows for a multitude of activities that despite precautions, could degrade and ultimately harm nationally significant resources. Activities allowed under this prescription, such as mining; new roads, trails, recreational day use facilities, cabins, campgrounds, hardened campsites, viewing areas, boat docks and ramps, and summer and winter motorized recreation (including off-road vehicle use), helicopter landings, and fixed-winged flightseeing will disturb, and over time, damage essential fish and wildlife and their habitats. We believe these impacts will have lasting effects on migratory bird populations and other fish and wildlife resources valued by local communities and the nation as a whole. Under ANILCA 501 (b), the USFS is directed to manage Copper River and Bering River

for the conservation of fish and wildlife and their habitats as the primary purpose. Multiple use activities are to be permitted in a manner consistent with the conservation of fish and wildlife and their habitats. We suggest that multiple use activities allowed under the preferred ANILCA 501(b)-2 prescription are inconsistent with the conservation of fish and wildlife resources and will interfere with the primary purpose of managing this area.

0028328-036

The new 501(b)2 prescription has two very contradictory emphases: conservation of fish and wildlife habitat and 'to provide motorized recreation opportunities.' Negative ecological impacts and impacts to wildlife from motorized recreation uses are well documented. Under this 501(b)2 prescription management of the fragile, coastal wetlands of the Delta undesirable 'seasonal opportunities for motorized recreation activities such as snowmachines, helicopters, and off highway vehicles' would harm fish and wildlife resources and change the current uses to the Delta --for subsistence hunting and fishing. The recreational emphasis completely contradicts to the original intent of the 501(b) area in accordance with ANILCA. This type of motorized activity on the Delta (both east and west of the Copper River) would do irreparable damage to fish and wildlife resources. Recreational helicopter and snowmachine activities must be removed for this prescription. We would like to see this prescription modified to exclude the recreational emphasis and language. Motorized activities in the wetlands region must also be carefully monitored. We, like the National Audubon Society, recommend a scientific baseline study be conducted on the effects of motorized craft on wildlife. This includes airboats, snowmachines, ORVs, and helicopters. Increasing recreational motorized activities and the infrastructure such as about 'keeping it the way it is' --this is increasing development in one of the most pristine, biologically important areas of the Chugach National Forest. For biological reasons and to meet the 501(b) intent, activities for 501(b)2 that should be changes from 'yes' to 'no' include OHV/Motorized Recreation Use (summer and winter), hardened campsites, locatable minerals activities and SUP helicopter landings. 501(b)2 motorized exceptions should only be seasonal hunting seasons.

0029318-001

I support 501(b)2 CDFU & Cordova's views on this subject!!!!

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0029410-002

The proposed 501(b)2 designation for the Copper River Delta does not offer adequate protection because it does not offer the long term-protection wilderness does. The 501(b)2 designation can be loosened in the future to allow mining, logging, and industrial tourism. This is our last chance to obtain a Wilderness protection for the Delta.

0034423-002

The 501 (b)2 designation currently proposed for the Copper River Delta does not afford the permanent protection that this critical wetland/estuarine complex so richly deserves and requires for its long-term viability.

0035542-001

Referencing my previously sent comments. Great Pacific Seafoods continues to be opposed to Wilderness designations in areas of the Chugach containing areas of important fisheries habitat and historic use. We continue to support the 501 (b) 2 management prescription in the Forest as it provides the most risk-free protection for our fisheries.

0035543-001

MANAGEMENT PRESCRIPTIONS FOR THE COPPER RIVER DELTA

Objections to East & West Copper River Delta proposed ANILCA 501(b) 2 preferred alternative.

The Prince William Sound Audubon Society is against the preferred alternative known as 213- 501 (b) 2. This prescription allows for increased human use infrastructure, including parking lots, boat docks and landings, new trails, campgrounds, viewing sites, electric utility corridors, new cabins, and oil drilling, mineral development, and transportation on public lands. All of these uses introduce incremental degradation and elimination of fish habitat through erosion, stream blockage, sedimentation, and introduction of hazardous wastes and toxic substances into the natural environment. At the same time, this alternative promotes large-scale tourist development, a development that the Prince William Sound Audubon Society is against.

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0035647-001

I support the proposed '501 b-2' management prescription for the eastern Copper River Delta. This designation, first and foremost, meets the standards put forth by the civic and industry leaders of Cordova as well as the explicit desires of a significant majority of the people who live here. It cannot be overstated in this regard that the needs of this 'community on the Delta' are paramount in that they will bear the burden or reap the benefits of Forest Service management of the surrounding land and water.

The various iterations of 'wilderness' that have been proposed for the Copper River Delta all seek permanency and every possible accommodation to existing uses so as to make 'wilderness' acceptable in the present political and social environment. Given the fate of similar wilderness proposals in Alaska, many of us familiar with the issue believe the requisite congressional approval to be unlikely. Further, the proposed 501-b wilderness prescription has so compromised the meaning of wilderness that the prefix 'wild' is arguably understated. The first time a determined wilderness advocate encounters a determined airboater, any remaining ambiguities will be resolved. Congress has given us clear direction on management of the Copper River Delta as well as definitions of wilderness and 'ANILCA wilderness'. Regardless of how we configure yet another definition of 'wilderness', it would clearly be in conflict with (he congressional mandate.

Within our support for the '501 b-2' designation is the conviction that our forest managers must have adequate resources if they are to effectively meet the demands of the future and manage in the face of uncertainty. Cordova is a fishing community and as such, we have a profound gratitude for the long history of Forest Service habitat restoration and enhancement activities in support of our fisheries. Wilderness or other restrictive designations that limit habitat manipulation to that conducted with handtools and other primitive techniques will effectively preclude meaningful fisheries projects. In addition, and in spite of permissive language specific to other wilderness designations in the national forests of Alaska, fisheries projects have become lightning rods for appeal or litigation by those who question the compatibility of such activities with the values of wilderness. These realities effectively elevate the cost of doing business to the point where it is no longer possible for the Forest Service to justify fisheries projects in 'wilderness' areas. The current 501-b 'wilderness' prescription should be more forthright in this regard.

0036081-001

I am opposed to the Wilderness designation and in full support of the 501(b)2 management, as is the City of Cordova and CDFU. It is of utmost importance to me that fisheries habitat and historic use be maintained under the 501(b)2 prescription as it has been.

0036084-001

I serve as a board member for Cordova District Fishermen United (CDFU), I just wanted to drop you a note to tell you that I still support 501 B 2 and not Wilderness,

0036180-001

I support 501(b)2 CDFU & Cordova's views on the subject!!!!

0036190-001

As a concerned commercial fisherman and after review of this situation, would like to support CDFU and the City of Cordova position on this matter.501 (b)2 seems to be the most viable for all concerned.

***Comment #    Comment***

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0036203-002    I have been commercial fishing in Prince William Sound and the Copper River delta for 15 years, and believe that the 501(b)2 designation is consistent with the needs and goals of both the communities in Prince William Sound and the US Forest Service.

0036207-001

I would like to express my support for 501 [b] 2 management. I am opposed to wilderness designations in areas of important fisheries habitat and access. I support CDFU and the city of Cordova's positions on this subject.

0036208-001

I do not support the Wilderness classification for the Chugach National Forest. I support the Cordova District Fishermen United and the City of Cordova's position concerning 501 b that lets the fish and game habitat alone.

0036233-001

I am writing to voice my opposition to wilderness designations in areas of important fisheries habitat and access. Furthermore, I am in total agreement and support of CDFU's and the city of Cordova's positions. 501 (b)2 management consistent with our industry's goals and needs because its primary purpose is the protection of fish and game and their habitat.

0036244-001

Just a quick note to ask for your support and lend mine to the campaign for the Wilderness designation of the entire Copper River Delta and Prince William Sound.

The proposed 501(b)2 does NOT adequately protect these areas from outside interests who would like to advantage of them purely for cash profit. The community does not want the mining or timber industry in these areas. Do not make decisions based on the pressure from from big business

0036245-001

I am writing to you in opposition of Wilderness classification for the Copper River Delta and any lands that may be important to fisheries habitat. I support the Cordova District Fisherman United and the City of Cordova in there favor of 501(b) 2 management.