

## *SAR - Forest Plan - Chapter 3 - 244*

### *Comment #    Comment*

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0022050-003	The Copper River Delta is unique within the Forest Service system as it was created by Congress as a wildlife refuge to be managed by the Forest Service. I understand that it is one of the only units in the system that has not been logged and where fish and wildlife conservation has been a top priority.
0022300-002	The Copper River Delta is unique within the Forest Service system as it was created by Congress as a wildlife refuge to be managed by the Forest Service. I understand that it is one of the only units in the system that has not been logged and where fish and wildlife conservation has been a top priority.
0026776-002	MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.
0026810-017	Northwest Resurrection Trail: We suggest adding a buffer area designation of Backcountry or Fish and Wildlife Conservation for K053 northwest of the Resurrection Trail.
0027570-007	Provide no allowance for ADOT&PF's proposed Copper Landing Bypass. The Fish and Wildlife Conservation prescription for this area should be strictly enforced.
0027582-004	Provide no allowance for ADOT&PF's proposed Copper Landing Bypass. The Fish and Wildlife Conservation prescription for this area should be strictly enforced.
0027613-002	I believe that all of the board members of the fishing organizations want to have the Copper River and Prince William Sound managed under prescriptions that will perpetuate the fish and wildlife resources that sustain us all.
0027613-004	The Copper River Delta is unique within the Forest Service system as it was created by Congress as a wildlife refuge to be managed by the Forest Service. I understand that it is one of the only units in the system that has not been logged and where fish and wildlife conservation has been a top priority.

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0028289-016    Prescriptions

There is noticeable improvement in the consistency between the allowed activities in each allocation and this prescription titles from earlier draft documents. The effect of the activities should be clearly articulated in the title and future desired condition of the prescriptions. This clear articulation will enable the Forest Service and the public to make better informed and fair recommendations. Following are recommendations for further clarification:

Fish and Wildlife Conservation

-- The theme of the prescription is inconsistent with the allowed activities. Achieving the goal of conserving specific fish and wildlife habitats will be difficult with trails, boat ramps, lodges, cabins, campgrounds, day use facilities and electronic sites.

0028367-007    Provide no allowance for ADOT&PI's proposed Copper Landing Bypass. The Fish and Wildlife Conservation prescription for this area should be strictly enforced.

0028504-005

5) Fish and Wildlife Conservation:

TWS feels strongly that the Fish and Wildlife Conservation prescription is not restrictive enough to ensure proper fish and wildlife habitat conservation, and thus fails to accomplish what the designers of the prescription set out to achieve. For example, as in the Brown Bear Core prescription, TWS believes the Forest Service has turned a blind eye to the impacts of motorized activities on fish and wildlife populations, and the agency is much too liberal in its approach to motorized activities within this prescription (please refer to comments under Brown Bear Core prescription above and Attachment 5).

Further, other aspects of this prescription are not restrictive enough to ensure the conservation and long-term viability of fish and wildlife populations. For example, destination lodges are conditionally allowed in this prescription. It is the combination of all the activities allowed or conditionally allowed within this prescription, such as destination lodges, heavy motorized activity, utility corridors, hut to hut recreation cabins, commercial timber harvest non-chargeable, etc., and their cumulative impacts which render this prescription insufficient to adequately protect fish and wildlife habitat and populations.

We request that the Forest Service review this prescription and change it so that motorized access and other types of development are significantly restricted, such as we have suggested for the Brown Bear Core prescription, so as to ensure the long-term protection of fish and wildlife species and habitat on the forest.

0029001-003    I told him the Fish and Wildlife Prescription had a focus on fish and wildlife while the Backcountry Prescription emphasized more or less recreation, fish and wildlife.

0029221-004    MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.

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0036561-005    . The Copper River delta area is renowned for its world class king and sockeye salmon fisheries, wildlife habitat, and one of the most important migratory bird habitats in North America. The Alaska National Interest Lands Conservation Act (ANILCA) specified that the conservation of fish and wildlife and their habitat should be the primary purpose for management of the area, thereby assuring adequate protection of the Copper River region of the Chugach.

0028328-019    . The Fish, Wildlife Conservation Area (244): Again, the management intent seems to be in ~ conflict with some of the allowable activities. Activities should reflect conservation, rather than human disturbance activities. This prescription should be ROS-SPNM rather than SPM, which would better reflect the conditional recreational motorized allowances. Utility corridors, again, are a problem for wildlife. These corridors are de facto roads, allowing increased human access. Generally, this leads to increased legal harvest as well as poaching. They also fragment habitat, a severe consequence especially with wide-ranging mammals in particular. Other activities that need to be changed from "conditional" to "no" in the allowed activities for 244 to meet the management intent include: commercial timber harvesting, new roads, SUP helicopter landings (both winter and summer), destination lodges, all minerals activities, "hut to hut" permits, campgrounds, and day-use facilities. We can assume that in the process of designing the 244 prescription from the 312 prescription, planning team members and others failed to catch the discrepancies in the two management prescriptions. 312 is for the primary purpose of recreation, 244 is for the primary purpose of conserving fish and wildlife—not diminishing or causing harm to the resource and its habitat by such incompatible 'conditional' activities such as mining, commercial logging, and helicopter tourism.

0029462-004

The Copper River delta area is renowned for its world class king and sockeye salmon fisheries, wildlife habitat, and one of the most important migratory bird habitats in North America. The Alaska National Interest Lands Conservation Act (ANILCA) specified that the conservation of fish and wildlife and their habitat should be the primary purpose for management of the area, thereby assuring adequate protection of the Copper River region of the Chugach.

0029468-011    ARC has several concerns regarding the prescriptions described in the DEIS. The following prescriptions should be changed so that they fulfill their intent:

2) Fish and Wildlife Conservation:

ARC feels strongly that the Fish and Wildlife Conservation prescription is not restrictive enough to ensure proper fish and wildlife habitat conservation, and thus fails to accomplish what the designers of the prescription set out to achieve. For example, as in the Brown Bear Core prescription, the Forest Service has turned a blind eye to the impacts of motorized activities on fish and wildlife populations, and the agency is much too liberal in its approach to motorized activities within this prescription.

Further, other aspects of this prescription are not restrictive enough to ensure the conservation and long-term viability of fish and wildlife populations. For example, destination lodges are conditionally allowed in this prescription. It is the combination of all the activities allowed or conditionally allowed within this prescription, such as destination lodges, heavy motorized activity, utility corridors, hut to hut recreation cabins, commercial timber harvest non-chargeable, etc., and their cumulative impacts which render this prescription insufficient to adequately protect fish and wildlife habitat and populations.

The Forest Service should review this prescription and change it so that motorized access and other types of development are significantly restricted to ensure the long-term protection of fish and wildlife species and habitat on the forest.

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0034436-003

Montague Island. The proposed prescription for Montague Island (244 - Fish & Wildlife Conservation Area) is unacceptable because it does not meet the management directive needed for the fish and wildlife habitat conservation.

0034458-003

MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.

0034929-005

Furthermore, the Cooper Landing Bypass would violate the Fish and Wildlife Conservation prescription for this area.

0035392-003

MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.

0035415-003

MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat.

0035515-003

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0035527-003

MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.

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- 0035604-003      MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.
- 0035812-001      MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.
- 0035852-003      MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.
- 0035974-003      MONTAGUE ISLAND. The management prescription proposed for Montague (244) clearly does not meet the management directive needed for the fish & wildlife habitat since it 'conditionally' allows for commercial timber harvesting, all minerals activities, motorized recreation, new roads, destination, utility systems, and year-round helicopter landings.
- TWENTYMILE RIVER VALLEY. The Twentymile wetlands produces 'outstanding habitat' for numerous fish & wildlife species.
- COPPER RIVER DELTA WETLANDS: Road construction, oil & gas development, & coal mining are extractive industries that would permanently scar the wild character of these magnificent wetland fisheries. Protect the Martin, Copper, Bering, Katalla Rivers as Wild for their outstanding and remarkable ecological values for fish & wildlife habitat.