



Sitka Conservation Society
Box 6533
Sitka, Alaska 99835
(907) 747-7509
info@sitkawild.org
www.sitkawild.org

*“Protecting the natural
environment of the Tongass while
supporting the development of
sustainable communities in
Southeast Alaska – since 1967.”*

August 10, 2012

Dear Members of the Blue Lake Licensing and Mitigation Group:

On behalf of the membership of the Sitka Conservation Society, we would like to comment on the mitigation measures and the draft mitigation meeting minutes from the July 20th, 2012 meeting.

1. **Concerning the funding of a campground host to mitigate the loss of lands used for recreation uses ranging from hiking, fishing, bird watching, exploring, wildlife viewing, fly-fishing, etc. and subsistence uses ranging from goat hunting, deer hunting, mushroom collecting, berry picking, etc.** The Sitka Conservation Society is opposed to the measure of providing a campsite host to mitigate the loss of lands and waters for recreation and subsistence activities. We strongly disagree that the campsite host is a valid mitigation measure and we do not see where the provision of funding for a campsite host does anything to cover the loss of the hunting, fishing, and recreation lands. Further, we do not see the public demand for a campsite host and we specifically do not see where the constituency that uses and depends on the lands and waters in the remote site at the back of the Blue Lake valley will benefit from a campsite host. This is not a provision that the Sitka Conservation Society agrees to. In fact, we would be embarrassed to report back to our members and the community that the campsite host could come close to mitigating the uses of the forest at the head of Blue Lake and all the important uses of that area. Specifically, as there is no permanence to the campsite host (limited to ten years), there is no symbolic value to the measure that in any way connects the mitigation measure to the values of the lands and the traditions and passions of the people who use the area that is going to be lost, and as the campsite host does nothing to provide any sort of opportunity to engage in similar activities to those being lost, we feel that the measure falls short. In sum, we are very supportive of the Blue Lake Hydro-project but we recognize that the project comes at a great cost to lands and waters that are used by many Sitkans and visitors and also provide critical habitat; because of the loss of use and habitat, we urge mitigation measures that recognize the importance of uses and aim to compensate for loss rather than just fulfill ancillary needs.
 - a. **Alternatives:** from the range of alternative options that the Forest Service provided, the option that we could accept is the hiking cabin on the Beaver Lake Trail system. We feel that this option would more directly benefit the people who use the Blue Lake valley and give options for similar recreation and subsistence activities. Further, this cabin would have more permanence than a temporary campsite host, would have symbolic value and be accepted by the public as a more fair exchange, would pass the red-faced test of a mitigation measure, and would garner much more use, enjoyment, and direct benefit to the public than a temp campground host. Further, it would be a much better investment of

\$100,000 than to pay for a temp campsite host in a campground that receives minimal use. **We don't accept the Forest Service's statement that** "they don't have enough money to maintain the cabins they currently have" and would cite the success of the Starrigavan Cabin which is on the road-system and has the highest use of any cabin on the Tongass National Forest. We urge the Forest Service to listen to the public's statements that the public visits and uses the cabins that are accessible and use those predominantly more (saltwater access cabins, road system cabins, trail access cabins from road system) than the remote cabins built to encourage float plane travel to very remote back-country lakes. Further, an investment in cabins that are heavily used by the public will increase revenue and funding for these public assets. The mitigation proposal by the Forest Service was for a hike-in cabin on the extremely popular Beaver Lake Trail System which is a measure that we would support as a mitigation measure.

- b. **Other alternatives:** there may be other mitigation alternatives that have not been discussed

2. **Concerning the use of timber in the flooded lands, trees that fall into the lake, and other wood products in the Blue Lake Valley:** The forest that is being flooded at the head of the Blue Lake valley is a type of Forest that is rare on the Tongass, that is important ecological habitat, has unique types of trees and wood products, and is used and treasured by the public. Again, we support the project and understand the choice we have made and that this valley will be flooded. However, we do feel that it is our utmost responsibility to the forest and lands of that valley to put those resources to the highest and most symbolic use. To compensate for the loss of that forest, we should be doing everything that we can to encourage the use of the wood products from that valley and provide opportunities for Sitkans and Sitka businesses to utilize these wood products. We cannot accept bureaucratic processes and rate structures within the Forest Service (an agency that has a long history of doggedly striving to provide wood products even under questionable and controversial rationale) that would prevent local entities from using this wood for traditional carving, home building, personal use, artisanal work, or home heating. We urge the Forest Service to work with the City of Sitka to find ways to provide local individuals and entities with opportunities to use the timber resource that would otherwise be squandered and slowly rot away, create an extensive eyesore, block traffic and access on the lake, create hazards to navigation and potential blockage to water-intakes and dam structures, and other-wise cost time and money to be gathered and burned.

3. **In terms of the other proposed mitigation measures:** We are pleased with the measure to donate the Boomer property and put it back into the West Chichagof Wilderness Area. We are pleased with the plan to provide funding for fertilization of Redoubt Lake provided that all the lands surrounding the falls of the lake are in public hands and the public has the opportunity to fish and subsist at this site. We are pleased with the escrow fund for mitigation of unforeseen impacts.

Sincerely,

Andrew Thoms
Executive Director
Sitka Conservation Society