

Terri Marceron  
Chugach National Forest's Supervisor's Office  
Attn: Forest Plan Revision  
161 East 1<sup>st</sup> Street, Door 8  
Anchorage AK 99501

2/3/16

Dear Terri,

Please accept my comments on the proposed Chugach National Forest Land Management Plan revision. I appreciate you and your staff's efforts to keep the Forest's plan relevant and up to date. I also thank you for the opportunities to be involved in the planning process.

My comments are focused on Prince William Sound, having studied recreational use and related impacts there since the early 90's, and worked and recreated there since the mid 80's. I am encouraged by many of the goals and objectives in the proposed plan, and have some suggested changes below.

However I ask that the plan be as clear and concise as possible in protecting the wilderness values of the Nellie Juan Wilderness Study Area. The reasons are well known: habitat and watershed protection (which supports the EVOS restoration plan), social and economic values, the law (ANILCA), administrative precedent (FSM 2300), and more.

My concern is what is happening to the lands in the WSA. The apparent intent of ANILCA was to preserve the lands in the WSA until Congress acted on Wilderness designation. (ANILCA Sections 704 and 708) However, over the years I have witnessed the slippery slope of degradation of wilderness values in the WSA. What I see is more use = more impacts = perception of less wilderness values = a 'lower' (less primitive) ROS classification = management actions to mitigate impacts = more use, then repeat. The current proposed plan potentially allows this paradigm to continue.

The WSA should be managed under the highest standard, that being the Wilderness Act of 1964 with applicable ANILCA provisions. This is clearly outlined in Alaska Region policy (R10 FSM 2320) and has been Chugach NF policy since the 1984 Forest Plan. Besides aesthetic and commercial reasons to maintain wilderness values for current users and businesses there is a more important consideration. That is to give future staff, administrators, and Congress the opportunity to study and consider the WSA for Wilderness as defined under the '64 Wilderness Act.

The proposed plan seems to classify much of the WSA based on adjacent use and perceived impacts. The standard that an area is not wilderness because of adjacent activities would eliminate most Congressionally designated Wilderness because of proximities to airplanes, roads, and other development. I request that the management areas be classified on their own merits, not influenced by adjacent activities. (Table 7, CNF Wilderness Area Inventory and Evaluation).

Impacts from use in the WSA are comparatively quite small, and quite seasonal, thus justifying Primitive classification. For instance in our 2008 study of 181 impacted sites, most of which are in the WSA, there was a total of 8470 M2 of impacted area. That is approximately .000001% of the 800,000 hectare WSA. Actual impacts at the sites are complicated. We concluded that over 15 years campsites generally had less trash, fewer fire

rings and informal trails, more vegetation loss, and bigger and more campsites. Signs of human waste, damage to vegetation, and soil exposure have increased. Thus people's direct experience has been impacted, but the relative amount of impact compared to the entire WSA is microscopic. (Long-Term Changes in Resource Conditions on Backcountry Campsites in Prince William Sound, Alaska, USA Paul Twardock et al. *Northwest Science* 2010 84 (3), 223-232)

My concern is that as use increases, and if management becomes less restrictive, real and perceived impacts will increase thus diluting the wilderness values the WSA was established to study and preserve until Congress acts on Wilderness designation.

I urge that the all areas in the Nellie Juan Wilderness Study Area be classified as Primitive. Then if and when Congress acts areas not included in any Wilderness can be reclassified from Primitive to less stringent ROS classification.

Also, though I prefer the entire WSA be recommended to Congress for Wilderness designation, that at least Knight Island, Columbia Glacier, Perry Island, Esther Island, Port Wells, College Fiord, Lake Nellie Juan, and the mainland along Knight Island be added to those lands already included in the 2002 recommendation.

Here are my other comments:

Social Economic Characteristics: p 11: Emphasize that wilderness supports the primary characteristics of the sound, including specific comments on the value of commercial and noncommercial recreation related to the forest and wilderness values.

PWS Geographic Area p. 15: Add comment that there are (anecdotally) signs of increase in wilderness based winter recreational use such as backcountry skiing.

Goals and Objectives: I support the research, educational and recreational goals, especially encouraging youth in the forest. Add ecological impacts of human use to research goals.

ROS Table 4: Primitive and semi primitive non-motorized access should not include aircraft, or define aircraft as fixed wing

P. 37: Standard FW G2 ST 10: Temporary camps should be completely removed at the end of seasonal occupation. This is a reoccurring issue in the Sound where seasonal camps turn into long-term camps with serious local impacts.

P 41: Table 6

In the Wilderness Study Area soil/watershed projects, wildlife habitat projects, and personal use timber harvest that are allowed by law, the Forest Plan should include specific standards and guidelines that provide the strongest protection for the WSA's wilderness character. The standards and guidelines should match the USFS Alaska Region policy (R10 FSM 2320) for the WSA.

Also new mineral leasing should not be allowed, and efforts to buy back subsurface and surface rights should be encouraged with willing sellers.

P 44: Guideline MA 1-GL-03: Administrative actions should not have any impacts on wilderness character, not done in a way that "minimizes" impacts. The plan should follow the USFS Regional policy for managing the WSA.

Guideline MA 1-GL-06: No temporary camps should be allowed in the WSA.

Standard MA 1-ST-03: "Recreation or Competitive" events is vague. Recreation in particular could be interpreted as including any recreational activity.

p. 48: Consider Barry Arm and Columbia Bay as research areas, or at least analyzing them for the potential. The retreat of the glaciers and newly exposed lands are a tremendous scientific opportunity.

EVOS acquired lands: All EVOS Acquired Lands should be managed for conservation and wilderness purposes, as described in their original purchase agreements. Such lands should not be subject to enhancement projects that alter water courses or remove trees or other vegetation, unless in response to a specific ecological concern.

Non motorized use: Please add primitive, non motorized areas to the Kenai Peninsula, especially near the road system. This addition ensures access for those who cannot afford or want motorized access.

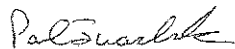
Scenic Integrity Objectives map:

Not sure the purpose of this map, but someone or some committee is delusional if they think Harriman Fiord/Barry Arm not "Highly Scenic?" Same with College Fiord and Columbia Bay, Knight Island, and Port Bainbridge. Change those areas to "Highly Scenic."

I encourage a second look at the wild and scenic river designations. The list of rivers eligible in the Forest is large, but not listing the Copper, Coghill, Bering and Martin rivers is a serious omission. Any action to support wild salmon populations is critical in the uncertain age of climate change.

I thank you for considering my comments and suggestions. I believe that ecological sustainability = economic sustainability, and that the ultimate ecologically sustainable designation is wilderness.

Sincerely,



Paul Twardock  
1322 N St  
Anchorage AK 99501