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Terri Marceron, Forest Supervisor
Chugach National Forest
161 East 1st Avenue, Door 8
Anchorage, AK 99502

Sent via email: <https://cara.ecosystem-management.org/Public/CommentInput?project=40816>

Dear Supervisor Marceron,

The following comments on the Proposed Revised Land Management Plan for the Chugach National Forest come from Wilderness Watch. Wilderness Watch is a national wilderness conservation organization focused on the protection of all units of the National Wilderness Preservation System. Our organization is particularly alarmed at the degradation that appears to be happening to the Nellie Juan-College Fiord Wilderness Study Area (WSA) on the Chugach. Some of the proposals in the Proposed Revised Land Management Plan would accelerate that degradation of the WSA's wilderness character. The Forest Service should instead do all it can to protect and improve the wilderness character of the Nellie Juan-College Fiord WSA.

The Congressionally-designated Nellie Juan-College Fiord Wilderness Study Area (WSA) on the Chugach National Forest in Alaska's western Prince William Sound is an ecological and scenic treasure. The Nellie Juan-College Fiord WSA is also the largest Wilderness Study Area in the entire nation. It is two million acres of ancient rainforest, wild salmon, and stunning mountains and glaciers. Its meandering fiords are laced with hundreds of remote islands. And the area is critical to Alaskans, for subsistence, commercial fishing, recreation, and the local tourism industry.

Unfortunately, the Proposed Revised Land Management Plan for the Chugach would loosen protections throughout the area and permanently remove protections from some of its most important places. This plan changes protections that have been in place since passage of the Alaska National Interest Lands Conservation Act (ANILCA) in 1980, and will hurt the wilderness character of

this magnificent WSA. The proposed Chugach plan would also allow residential timber harvests, expanded motorized uses, manipulation of habitats, mining, and helicopter-assisted skiing and hiking, all of which would damage the WSA's wilderness character.

Our specific comments follow:

- The Forest Service must keep its longstanding promise to protect the wild character of the *entire* Wilderness Study Area until Congress finalizes its protection. This means maintaining and clarifying rules on all land-based motorized and mechanized uses – *including prohibiting chainsaw use* – and preserving the area's current undeveloped and non-motorized and non-mechanized character.

- The Forest Service should recommend all of the 1.9 million eligible acres of the WSA for designation as Wilderness.

- The Forest Service should also recommend eligible roadless areas outside of the WSA for Wilderness. The Kenai Mountains Inventoried Roadless Area (IRA), as an example, must also be carefully examined even though much of this IRA lies outside the boundaries of the WSA. The Forest Service should recommend eligible portions of all IRAs for wilderness designation.

- The Forest Service must not abandon protection for the nearly 600,000 acres that the agency proposes to eliminate from the WSA. Do not recommend elimination of these acres from the WSA.

- The Forest Service must reverse the terrible recommendation to split the Nellie Juan-College Fiord Wilderness Study Area into two smaller units. This would dramatically shrink the area by permanently stripping long-established protections for Knight Island, Columbia Glacier, Perry Island, Glacier Island, Culross Island, Esther Island, Port Wells, mainland Knight Island Passage, and Lake Nellie Juan. Do not eliminate wilderness protection for these critically important areas.

- The Forest Service must prohibit recreational snowmobile use in the WSA. Snowmobile use has exploded in the WSA in recent years. ANILCA, section 1110, allows snow machines under certain circumstances for "traditional activities" such as subsistence purposes, but that section of ANILCA does NOT permit recreational snowmobile use in the WSA. The agency has turned a blind eye to burgeoning recreational snowmobile use in the WSA and allowed this illegal use to grow significantly to the detriment of the WSA's wild character.

- Management of the Nellie Juan-College Fiord WSA should follow the Forest Service's Alaska Regional Office WSA direction and guidance, since ANILCA contains no substantive guidance on WSA protection and management.

- The Forest Service must abandon the proposal to allow small-scale timber harvests and manipulation of watersheds, soils, and habitats in the Wilderness Study Area.

- The Forest Service must honor its twenty-year promise to restore the conservation, recreation, and wilderness values of the Exxon Valdez Oil Spill Restoration Plan. The proposed Forest Plan weakens protections, especially in the Wilderness Study Area.

- The Forest Service should acquire subsurface rights to the lands purchased following the Exxon Valdez oil spill to protect them from mining similar to that recently begun near Cordova.

- The Forest Service must stop encouraging exploration for mining in the Nellie Juan-College Fiord WSA. Mining conflicts with the wild character of the WSA and with current human values of western Prince William Sound. Mining would harm the wilderness character, subsistence, commercial fishing, and recreation/tourism that now thrive in the area.

In the Chugach National Forest, the Forest Service is entrusted to manage some of Alaska's most treasured wild lands in the Congressionally-designated two million-acre Nellie Juan-College Fiord WSA. Changing that now—by allowing residential timber harvests, expanded motorized uses, manipulation of habitats, mining, and helicopter-assisted skiing and hiking—would harm this beautiful Wilderness Study Area. It defies common sense. Instead, the Forest Service should maintain current protections and recommend to Congress its perpetuation into the future. This world-class wild area deserves permanent protection now and far into the future!

Please keep Wilderness Watch informed of further developments on the Proposed Revised Land Management Plan for the Chugach National Forest, and particularly for the Nellie Juan-College Fiord Wilderness Study Area.

Sincerely,



Kevin Proescholdt
Conservation Director