

Data Submitted (UTC 11): 2/17/2016 11:00:00 AM

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February 16, 2016

To: Terri Marceron, Forest Supervisor

Chugach National Forest

101 East 1st. Ave., Door 8

Anchorage, AK 99501

Re: Chugach National Forest Management Plan

To whom this may concern,

As a 40-year Alaska resident, my family and I truly cherish the magnificent wilderness of our great state. Experiences in the Chugach National Forest and Prince William Sound flood my mind with countless memories: sea kayaking up College Fiord, witnessing the calving of tidewater glaciers, watching sea otter pups and harbor seals navigate through floating ice, camping on spectacular Knight Island, hiking across alpine and peat bog meadows, gazing at the lofty peaks of the Chugach Mountains, listening to the yodel of loons or the roar of Stellar sea lions, and savoring freshly caught wild salmon.

This is Alaska at its dazzling best. It's a jaw-dropping wilderness that takes my breath away every time I fly over the region at 15,000 feet in route to Anchorage. How many times have I watched wide-eyed passengers look out the window and shout "amazing!" "so beautiful!" "What an incredible place!"

People from all over the world will continue to come to Alaska if we protect the beauty of our wilderness and the incredible diversity of wildlife that it supports. This is the sustainable draw that Alaska holds if we are wise stewards.

I'm grateful that Congress had the vision to set aside 1.9 million acres of the Chugach National Forest as the Nellie Juan-College Fiord Wilderness Study Area (WSA) under the 1980 Alaska Lands Act. Having visited many of the fiords and islands within the WSA, it's evident that the vast majority of land is primitive, roadless and wild. The scenic value of the WSA is extraordinary ---it is the kind of magnificent topography that many would associate with our national parks.

As you paddle or hike through the WSA the views are spectacular at every turn. Each fiord has a unique character defined by the massive glaciers that scoured the landscape. This dynamic wilderness is one of few places in the world where you can witness and walk upon new land recently exposed and polished by retreating

glaciers. You can bear witness to a warming climate while standing on an island that was buried in thousands of feet of ice only a few decades ago.

Another unique feature to this wilderness is the close proximity of the Chugach Mountains to the Sound. In a very short distance a person can hike from the tide line to the summit of peaks that rise as high as 13,000 feet. You can walk through a thick canopy of moss-draped spruce, hemlock, devil's club and ferns, and know that you are on the northern edge of the world's largest temperate rain forest. Beyond the forest you can explore pond life in peat bog meadows and smell fragrant orchids and yellow cedar. As you ascend these steep meadows there are always new dramatic vistas of the Sound, its islands and forested coves, and the surrounding ice-cleaved mountains. At higher elevations you can walk across alpine meadows, scale a rocky ridge, or catch a glimpse of a mountain goat on a crag above you.

The Nellie Juan College Fiord Wilderness Study Area embraces a powerful and majestic kind of wilderness that is unique to America because it holds the highest concentration of active tidewater glaciers, spectacular coastal mountains and the northern edge of a beautiful temperate rain forest. This incredible wilderness has a bonus value: it is graced by the waters of Prince William Sound which allows people to access this stunning region of Alaska.

In 2002 the Forest Service recommended that certain areas within the WSA be removed from wilderness protection. These special areas include upper Columbia Bay, Glacier Island, Knight Island, Nellie Juan Lake and Esther Island. The Forest Service should not withdraw these areas from the WSA. These places have outstanding wilderness values. Having kayaked, camped and hiked in these withdrawn areas, I'm surprised that the Forest Service chose to exclude these special places and shrink the original wilderness study area.

I urge the Forest Service to protect and manage the original WSA as wilderness, and recommend that Congress designate the entire WSA as official wilderness, along with the ten rivers that have been identified for inclusion in the National Wild and Scenic River System.

In terms of management objectives, the wilderness of the original WSA should not be compromised or diminished by increased recreational snow machine use, helicopter landings, chainsaw use, mining activity, and overcrowding at campsites which can damage the wilderness setting and cause human sanitation problems. If a beach area is overrun with campers the Forest Service should act accordingly and establish limits on the number of parties and individuals.

The Forest Service should consider enacting measures such as a requirement that commercial guides with large parties pack out their human waste and garbage. There is a finite amount of good beach camping sites along some of the fiords in the WSA, particularly near Whittier. Accessible places such as Blackstone Bay need greater oversight, possibly through a permit system for the benefit of all users, and for the benefit of the wilderness resource that the Forest Service must protect.

In the draft management plan (Pg. 44), Guideline MA 1-GL-06 is inconsistent. It's noted that camp conditions should reflect "Leave No Trace" and low impact practices, while further stating that wooden tent platforms and boardwalk construction should be used instead of gravel pads and gravel trails. In the case of the WSA, wooden structures and gravel pads do not reflect the "Leave No Trace" philosophy associated with wilderness. Neither is appropriate.

Some thought should be given to the maximum party size in primitive areas. The proposed plan notes 15 as the maximum number. If a party of 15 plans to camp in the WSA in one location, it's hard to imagine how that group could "Leave No Trace" when it comes to sanitation and impacts on the vegetation. The Forest Service should consider lowering that maximum party size for camping use in the WSA.

During one of my visits to the WSA I helped the Forest Service clean up an old bear bait station along College Fiord, not far from the shoreline where recreational sea kayakers might camp. It was disturbing to see the mess left by these hunters: a circular area of no vegetation at the baiting site, a shooting platform and ladder constructed in the forest, and garbage at fire ring. Bear baiting carries the risk of creating unexpected human conflicts with other recreational users who have no idea that an active or abandoned bait station is located near their campsite.

The Forest Service should recommend to the Department of Fish and Game that bear baiting be banned in the entire WSA and other multi-use areas in Prince William Sound where recreational users might be at risk of camping near a stinky baiting site that purposely attracts bears. Imagine if a party of recreational sea kayakers left a smelly pot of food out to attract bears at a campsite, versus properly storing food in required bearproof containers. This is a safety issue.

In closing, I urge the Forest Service to protect the wilderness values of the Chugach National Forest. With growing public support and interest in protecting the Chugach, the Forest Service should do all it can to maintain the wilderness character of one of Alaska's greatest natural treasures.

It's surprising that the Chugach National Forest is one of few forests in the United States with no designated wilderness, when in fact it holds some of the most stunning de facto wilderness in America. Now is the time to submit a formal recommendation to Congress and take care of this important unfinished business of the Alaska Lands Act.

Thank you for your consideration and good luck with the final plan.

Debbie S. Miller