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Title:

Comments: To: Forest Supervisor Terry Marceron

Re: Forest Plan Revision, 161 East 1st Street, Door 8

Anchorage, AK 99501

To Supervisor Marceron and the Forest Plan Revision team,

I am writing brief comments in regards to the Chugach National Forest plan revision process. As a long-time researcher on the Tongass National Forest, and a long-time resident of Alaska, I am familiar with both the forest planning process and the forests that will be impacted with this process. I am currently a research professor and director of an institute focused on wilderness education, outreach and research at the University of Montana, and I am always encouraging students and the public to participate in the planning process.

The first point I would like to address is the designation of new wilderness on the Chugach National Forest. I understand both the state and national climate is not particularly "friendly" towards wilderness, but the Forest planning process is one way to abate the contemporary debate over wilderness and make it an agency-driven mandate to propose wilderness designation for areas of the Chugach National Forest that both qualify for this protection (which is over 99% of the forest) and would benefit from this protection (those areas that see high use or may be vulnerable to losing wilderness characteristics in the future. Based on the available information in the revision documents, I would like to recommend wilderness designation for the following areas:

1) Twentymile on the Kenai Peninsula; 2) Nellie Juan in Prince William Sound; 3) Prince William Sound Islands; 4) College Fiord; 5) Montague Island. Below, I have listed independently the reasons for wilderness designation for each of these areas.

1) Twentymile: A beautiful river adjacent to a wilderness study area and next to state wilderness. IT is also a recommended wild and scenic river, and a wilderness designation would help the river maintain its wilderness character for future Wild and Scenic designation. Its primary uses by local residents of Anchorage and Girdwood are wilderness compatible activities such as backcountry hiking and packrafting.

2) Nellie Juan: Home to a tidewater glacier, which is by itself an important natural reservoir of freshwater, as well as a geologic and natural feature of significance for all of Prince William Sound and the Chugach National Forest. It is part of a wilderness study area, it is home to the rare Kittlitz' murrelet, and it is also recommended as a wild and scenic river. Alaska has the opportunity to protect some of the last tidewater glacier environments in the world, significant for a number of species, and rich coldwater estuary environments for myriads more.

3) Prince William Sound islands: The rocky coastline, remoteness and the fact these islands ALL reside within a wilderness study area suggests they should be designated wilderness. Again, these are areas that in order to be developed, would have to see SIGNIFICANT change, which would not come without legal action or cost to Alaskans and the United States as a whole. Alaska has the ability to actually set aside an island archipelago as designated wilderness, not only recognizing the vulnerability of this north temperate island system, but also, its importance as a place of wild and remote recreation, including hunting, fishing, kayaking, backpacking, skiing, etc. Also, Alaska wilderness designation can come with caveats-meaning, people could still use power boats and float planes to access wilderness, a model that is commonly used throughout much of the designated wilderness on the Tongass National Forest. The original 1.9 million acre Wilderness Study Area (WSA) of western Prince William Sound should be recommended to Congress for designation as Wilderness; the WSA should continue to be managed as Wilderness and remain the same size until it is congressionally designated.

4) College Fiord: Similar to Nellie Juan, College Fiord is the research site for ongoing studies of glacier/saltwater flux including species counts for Kittlitz' murrelets and other species that need freshwater and saltwater mixing for life history characteristics. It is also a glacial fjord, distinct in geology as well as topography, and it is also a

wilderness study area. It is an intact northern glacier ecosystem, where both primary succession and glaciology are studied and it represents a globally significant ecosystem because of the presence of glaciers within the fjord.

5) Montague Island: It is a huge, wild island, the east side is completely inaccessible to most watercraft, and its topography surpasses that of almost any other island in Prince William Sound. Little is known about the fauna, but what is known suggests a distinct history for the island, possibly Pleistocene nunataks, as there is an endemic subspecies of marmot only found on the island, and the Montague Island vole also resides on the island. As part of the research team that described these organisms, I am personally invested in maintaining the wild and remote nature of this island, hoping to cross it someday on backcountry skis, or at least, protect its wilderness value so my children or their children could choose to do such a wild adventure. Again, Alaska has the opportunity to protect an island of incredible global significance, in that not many islands in the Pacific can boast almost complete intact ecosystems such as those found on Montague Island.

6) The eastern Chugach - including the Copper River/Bering River/Martin Lake & River/Katalla Rivers and watersheds - area should be protected as critical salmon and wildlife habitat and continue to allow existing use for fishers and subsistence harvesters.

My second point is about maintaining intact ecosystems for the species within the Chugach National Forest. As outlined in the Forest plan revision documents, there are a number of species, both native, and now, introduced but of significant cultural value (i.e. Sitka black-tailed deer) that should be considered when any forest plan revision occurs. The USDA Forest Service has recently chosen a management path that has decreased research funding dollars at both the national and regional level for all scientific investigations, inventories, and management of national forest lands across the country. As a researcher with an established record working with the Forest Service in Alaska, I wish I could personally persuade politicians to assist with increasing funding for research, and decreasing funding for fire programs, however, we as a society choose to set our values, and currently, our values do not include scientific inquiry and science-based management. I would encourage the Chugach National Forest to establish research priorities within the Forest Plan revision-highlight the research needs, questions, and areas of particular concern on the forest, where collaborators and partners may be able to provide support with the overarching goal of maintaining or restoring the globally significant ecosystems of this northernmost national forest. For example, I would like to see agency support for marine debris clean-up programs continue into the future. I am personally familiar with the work of Gulf of Alaska Keeper, and I would ask the agency to keep in mind these valuable partnerships as part of the forest plan revision, highlighting the important work that is being done to clean up thousands of miles of coastline from marine debris. Having been a small part of this project in the past, walking miles of coastline with trash bags picking up tiny pieces of plastic, I can stress the importance and need for these programs. We need to keep the Chugach National Forest wild through policy-as in Wilderness Designation for important areas of the forest, as well as keep it wild with restoration efforts. This restoration effort includes the request that the Exxon Valdez Oil Spill (EVOS) Restoration mandate for the region must be upheld.

The Forest should be withdrawn from mineral and forestry activity; and additional protective conservation acquisition areas should be identified.

Finally, I would like to stress the importance of biological diversity held within the Chugach National Forest. As the northernmost national forest in the United States, the Chugach represents a wealth of plant and animal communities that may not be as diverse as southern systems in sheer numbers of species, but outperform many other areas in the numbers of distinctly northern species reside within the region, not to mention that Prince William Sound is home to salmon fisheries that represent some of the last, remaining wild salmon fisheries in the world! The only real way to secure a wild, intact ecosystem that supports native species, both aquatic and terrestrial, is to provide permanent protection for these lands and waters, and wilderness designation under the 1964 Wilderness Act is the best way to accomplish this goal in the Chugach National Forest. Without additional protections and the mandates recommended above, as a concerned and active citizen, I feel the proposed Forest Plan Revision, as written, is unacceptable and must be re-written to preserve the region more completely and managed primarily for the protection and conservation of fish and wildlife habitat as ANILCA intended.

Thank you for the opportunity to comment on a very important and critical piece of our national heritage, as well as a place that is very important to my own life, both personally and professionally.

Sincerely,

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