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Organization:

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Thank you for the opportunity to provide public comment.

In general, I feel the Management Area descriptions for the WSA and EVOS Acquired Lands need work. Both include inaccuracies that are critical to correct. In particular, I feel the proposed plan would be a disservice to WSA lands and the people and businesses they support.

The plan does not include adequate language to meet the central directive to protect the WSA's wilderness character. It does not offer a definition of wilderness character, which is important for both the public and agency personnel. It allows, by omission or otherwise, existing and new uses clearly detrimental to wilderness character. Overall, it does not appear to align with the importance of the WSA as a congressionally designated area that comprises over a third of the Chugach National Forest and is clearly treasured by the public and many businesses. Nor does it seem to address the challenges the area faces from the effects of increased visitation, resource damage, and motorized incursion, all sources of common public complaint. In many cases, it does not appear to meet the 2012 Planning Rule's direction for recommended wilderness.

I've outlined some ideas below to correct inaccuracies and improve the plan in ways that will meet WSA law and policy in the years ahead.

My comments are based on the following:

*The public has consistently and overwhelmingly expressed support of wilderness protection for western Prince William Sound for over forty years. Formal examples include the development of ANILCA beginning in the mid-1970s (with all examples until 1978 including a Nellie Juan Wilderness, which was then replaced by the WSA) and the Chugach National Forest planning efforts of 1984, 2002, and today.

*Since the early 1980s, the US Forest Service has responded to public input and the 1980 congressional establishment of the WSA with a clear and consistent strategy of preserving the area's wilderness character until Congress addresses the area further. The strategy is modeled after the 1964 Wilderness Act and the provisions of ANILCA (R10 FSM 2320; 1984 CNF Plan; 2002 CNF Plan).

*For over a generation, public uses and business plans have developed around the Forest Service's WSA management strategy, centered on preserving wilderness character. They include subsistence, commercial fishing, and a lucrative recreation and tourism industry.

*Any departure from the long established policy of managing western Prince William Sound for preservation of wilderness character, based on the intent of the 1964 Wilderness Act and the provisions of ANILCA, is a significant action with the potential to disrupt present uses and economic activity in western Prince William Sound.

*The 2012 Planning Rule, which is the direction for the update of the Chugach NF plan, identifies the need to manage areas of recommended wilderness to protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. This includes but is not limited to the need to prevent expansion of uses that could jeopardize the potential of the inclusion of these areas into the National Wilderness Preservation System by allowing activities inconsistent with the long-term management of the area as wilderness (I.E. motorized uses that are currently prohibited by the Wilderness Act with ANILCA provisions).

oNote: applies to recommended wilderness, which currently does not include the entire WSA. However, a conservative approach that is responsive to public comment and the area's longstanding protections is to apply this guidance to the entire WSA until Congress acts.

*Even thirty-six years after the signing of ANILCA on December 2, 1980, confusion and disagreement persist

within the Chugach National Forest and among some in the public about management goals for the WSA. It is an unnecessary and counter-productive situation that stymies management of approximately 37% of the forest. The confusion is acknowledged in the proposed plan and Assessment. Reducing confusion should be a high priority of the Revised Forest Plan and fits entirely within the guidance of the 2012 Planning Rule, especially Chapter 70, Section 74.1.

*The Chugach Forest Plan must be consistent with the goals of the Exxon Valdez Oil Spill Recovery Plan of 1994. It should acknowledge Wilderness, specifically within the WSA, as an EVOS injured resource that has not fully recovered under the terms of the plan, as expressed in the EVOS Trustee Council 2014 Status of Recovery Report.

*The Forest Plan must reflect strict adherence to the Chenega, Eyak, and Tatitlek Purchase Agreements for EVOS Acquired land and must acknowledge the close tie between those lands and the recovery of the injured wilderness resource.

Synopsis of Recommended Changes to the Proposed Plan

The reasoning behind the following recommended changes is described below in detail. It is lengthy because of the complexity and importance of the issue. To ensure the brevity of the recommended changes is not lost in the descriptions to follow, the changes are summarized here:

1. On Table 6, General Suitability Determination (p. 42), add a "Conditional" determination and apply it to watershed/soil and wildlife and fish projects in the WSA, or change the determination to Unsuitable (see below).

2. On Table 6, General Suitability Determination (p. 42), change personal use timber harvest from "Suitable" to "Unsuitable" (see below).

3. Add the following one sentence to MA 1 Management Intent:

Per Alaska Regional policy (R10 FSM 2320.3), management of the WSA will follow the same direction provided for wilderness areas established under ANILCA to the extent consistent with law until Congress determines otherwise.

4. Correct language in MA 1 1-DC-01 to replace "WSA" with "wilderness character" (see below)

5. Add four or more MA 1 Desired Conditions that reflect the qualities of wilderness character, including:

- a. Ecological systems function without direct human manipulation. The landscape is undeveloped and appears primarily affected by the forces of nature.
- b. Visitors primarily use non-motorized equipment and non-mechanized forms of transport, subject to ANILCA provisions, in an environment that offers high levels of challenge and risk.
- c. Evidence of modern recreational use is generally only visible at popular areas. Degraded sites are restored where feasible. Impacts are reduced through strategic commercial use allocation and public education.
- d. Opportunities for solitude and primitive recreation are preserved or enhanced through management actions, strategic commercial use allocation, and public education.

6. Fix inaccuracy in MA 1-GL-01 by adding the following clause:

"for prohibited uses identified in Section 4c of the Wilderness Act and not specifically authorized by ANILCA, along with actions that manipulate natural processes."

7. Add the following MA 1 Standards and Guidelines:

- a. Group size shall be limited to 15 people or less.
- b. While evaluating the need for aquaculture projects and fish habitat improvements, availability of suitable opportunities outside of the WSA should be considered.
- c. When improvement or enhancement of fish habitat is authorized, it shall be designed and maintained to limit impacts to wilderness character per ANILCA and Alaska Region manual direction.
- d. Heritage resources shall be maintained in an undisturbed state and as a feature of wilderness character with no

on-site interpretation.

e. Commercial services shall only be authorized to the extent necessary for realizing recreational or other purposes of the area.

f. Commercial filming in the WSA shall follow USFS national direction for commercial filming in wilderness and any applicable ANILCA provisions.

g. The land-based use of chainsaws, generators, and other hand-portable motorized equipment shall be prohibited except:

i. For uses directly and necessarily related to the taking of fish and game as described in ANILCA Sec. 1316.

ii. Under special use permit for necessary utilization of subsistence resources as described in R10 FSM 2328 (3)f).

iii. Under special use permit for other approved and appropriate purposes.

h. The use of drones in the WSA is prohibited except under special use permit.

i. Use of snowmachines, when there is adequate snow cover or frozen river conditions, is allowable under ANILCA Sec 1110 for traditional activities, subsistence, or for travel to and from villages and home sites.

j. Mechanized transport and motorized equipment for administrative use shall be approved by the Forest Service officer with delegated authority (see Alaska Region policy).

8. Fix the inaccuracy under MA 6 Management Intent by replacing "conservation and restoration purposes" with "conservation and wilderness purposes."

9. Fix the inaccuracies under MA 6 DC 2, MA 6 GL-04, MA 6 GL-05, MA 6 GL-06 by replacing "conservation and restoration values" with "conservation and wilderness purposes."

10. Include the following definition of wilderness character in the Glossary

Wilderness character shares the same definition developed nationally by the four federal lands agencies and drawn from the statutory language of the 1964 Wilderness Act. It comprises the following five qualities:

o Untrammeled: ecological systems are essentially free from direct human control or manipulation.

o Natural: the landscape appears to be affected primarily by the forces of nature.

o Undeveloped: is essentially without permanent improvement, modern human occupation, and most motorized uses, to the extent consistent with ANILCA and the 1964 Wilderness Act.

o Solitude: provides outstanding opportunities for solitude or primitive and unconfined recreation.

o Other Features: retains other features of ecological, geological, scientific, educational, scenic or historical value that contribute to wilderness character.

Note: Or, look at Keeping It Wild 2 (Landres et al) (page 7) for other interagency wording.

The proposed changes are concise and do not add undue weight to the plan. Rather, they correct inaccuracies and omissions and present a clear and compact description of the WSA management area, addressing its most relevant issues and dispelling the internal confusion that presently plagues WSA management.

The proposed changes do not make the plan encyclopedic by overly citing policy or law, yet they derive from longstanding legal or policy sources unlikely to change during the life of the plan. They are general enough to allow for an acceptable amount of change in the years ahead without triggering a Forest Plan amendment.

The proposed changes are supported by the 2012 Planning Rule Chapter 70 Section 74.1, the Prince William Sound Framework, the 1994 Exxon Valdez Oil Spill Recovery Plan, Alaska Region policy, ANILCA, the results of 2012-2015 CNF Wilderness Character Monitoring, the Final Scoring Report for the 2012-2014 WSA Stewardship Plan, the provisions of the Draft 2016-2020 WSA Stewardship Plan, public comment, and the two previous Chugach National Forest plans. To varying degrees, failure to address the issues raised here will bring the plan into conflict with the above sources.

DISCUSSION

Watershed/Soils and Wildlife and Fish Habitat Projects

Issue

A blanket suitability determination for this range of projects is inconsistent with law, Alaska Region policy, public

expectations for the WSA, and basic principles of preserving wilderness character.

Solution

Add a "Conditional" determination and apply it to watershed/soil and wildlife and fish projects or change the determination to Unsuitable.

Discussion

Specifically regarding fish habitat projects as defined on page 43, a blanket suitability determination for the WSA contradicts federal law in the form of ANILCA 1315b. The section states such uses "may" be permitted in the WSA, but that they "shall be" constructed, managed and operated in a way that minimizes impacts to the area's wilderness character. This stringent direction requires the Forest Service to balance inherently opposed concepts. As such, it requires attention and finesse for approval and design of every related project and does not meet the definition of generally suitable. Instead, the uses are allowable, conditional on measures to protect wilderness character.

If the Chugach NF refuses to add a "Conditional" category, the determination for fish habitat projects should be changed to Unsuitable. This would not prohibit approval of such projects on a case-by-case basis. Rather, it would accurately reflect the general incompatibility of such projects with the prevailing direction to preserve the WSA's wilderness character. MA 1 Standards and Guidelines (proposed below) would provide direction for case-by-case approvals.

Since 1315b is one of the only ANILCA clauses where Congress specifically addresses management of the NJCF WSA, the Chugach NF must exercise due diligence in getting this right. It requires a conservative approach (Conditional or Unsuitable determination) over a liberal and overly permissive approach (Suitable determination).

The blanket suitability determination for soils/watershed and wildlife habitat projects similarly conflicts with Alaska Region policy and proposed Revised Forest Plan direction to preserve WSA wilderness character. As one of many imaginable examples, the resultant enhancement projects would directly conflict with the untrammelled and undeveloped qualities of wilderness character (see wilderness character definition below).

Under certain circumstances related to restoration, invasive or endangered species, preservation of wilderness character, or other issues, limited watershed/soils and wildlife habitat projects may be considered on a case-by-case basis in the WSA. But they would not be considered generally suitable. Instead, they are conditional upon various aspects of the area's prevailing direction to preserve wilderness character. The case-by-case terms of approved projects would be analyzed through the Minimum Requirement Decision Guide (MRDG) (see MA 1 Standards and Guidelines below).

Using the same rationale described above for fish habitat projects, the determination of Conditional or Unsuitable should be applied to watershed/soils and wildlife habitat projects.

Personal Use Timber Harvest

Issue

The blanket suitability determination for personal use timber harvest is incompatible with Alaska Region policy, basic principles of preserving wilderness character, and public expectations for the WSA.

Solution

On Table 6, General Suitability Determination (p. 42), change personal use timber harvest from "Suitable" to "Unsuitable." Or, considering the complexities of law and regional policy referenced below, introduce a "Conditional" determination to Table 6, which would be applied to personal use timber harvest. The former is much preferred over the latter.

Discussion

The blanket suitability determination for personal use timber harvest in the WSA changes the area's longstanding management and goes against the purpose of the ANILCA Section 704 Wilderness Study. It is also entirely inconsistent with public/business expectations for the WSA and any notion of preserving wilderness character. It also contradicts FSM policy for wilderness and Alaska Region FSM policy for the WSA (which necessitate following FSM wilderness policy; see below).

Although certain limited allowances may be considered for subsistence and free use timber in the WSA, they are highly constrained or flat-out prohibited by Alaska Region policy. And while policy is complex, the Forest Plan has the ability resolve any confusion by establishing the WSA as off-limits to any such uses, as described in R10 FSM 2462.2 (4)c and CFR 261.50 Orders.

Again, the Revised Forest Plan should take advantage of all opportunities to reduce existing internal/public confusion about the WSA. The suitability determination for personal use timber (and for watershed/soils and fish and wildlife habitat projects) would only increase confusion.

To review FSM and R10 FSM policy applicable to personal use timber harvest in the WSA, see: FSM 2320.3 (1) and (2); FSM 2323.51, FSM 2323.53b; R10 FSM 2320.2 R10 2320.3, R10 FSM 2320.04c (16), R10 FSM 2320.04d (10), R10 FSM 2323.53 (04), R10 FSM 2326.04c (5) and (6), R10 FSM 2328.1, R10 FSM 2462.2 5a and b(3) and 4c.

Incidentally, the complexity of this example highlights the need for the Chugach Forest Plan to acknowledge and adhere closely to Alaska Region policy for the WSA.

MA 1 Management Intent

Issue

Current language adds to existing confusion by not adequately describing WSA management intent.

Solution

"Per Alaska Regional policy (R10 FSM 2320.3), management of the WSA will follow the same direction provided for wilderness areas established under ANILCA to the extent consistent with law until Congress determines otherwise."

Discussion

When describing WSA management intent, it does not make sense to refer to ANILCA without referring to Alaska Region policy, which provides the bulk of WSA management direction. Comparatively, ANILCA provides very little clear management intent for the WSA. Public comments overwhelmingly demonstrate that the omission of Alaska Region policy from the management intent description, which is a meaningful change from the 1984 and 2002 plans, creates confusion and disagreement. It is a critical flaw likely to complicate decision-making over the life of the revised plan.

MA 1 Desired Conditions

Issues

- oUsing just one Desired Condition for MA 1 is inadequate for describing the specific social, economic or ecological characteristics desired for the area and is likely to compound existing confusion and disagreement over WSA management.

- oCertain language within proposed MA 1-DC-01 does not make sense.

- oThe current DC is weighted almost entirely toward human use and economy, at the expense of other desired conditions.

Solution

In MA 1-DC-01 replace "WSA" with "wilderness character."

Add four or more Desired Conditions to better reflect desired biophysical attributes of the area not currently included in MA 1-DC-01.

Discussion

MA 1-DC-01

The first sentence conveys essential information but as written does not make sense. The problem lies within the sentence's independent clause: "The WSA is a defining feature of western Prince William Sound." The WSA is a land-use designation and as such cannot be a defining feature of a landscape. Instead, the defining feature of the landscape is its wilderness character, which supports the opportunities listed in the sentence's dependent clause: "where visitors find opportunities for solitude, remoteness, closeness to nature..."

Otherwise, the sentence is important to keep, as it conveys essential goals for the area. Correcting the sentence is simple:

"The wilderness character of the WSA is a defining feature of western Prince William Sound, where visitors find opportunities for solitude, remoteness, closeness to nature...."

Also, the proposed Desired Condition assigns almost entirely anthropocentric values to the WSA. This does not adequately align with the meaning of wilderness character, which is a legal term. While human values and uses are an important component of wilderness character, they are not the sole consideration. Instead, they are entwined with specific biophysical features. Foremost among these is a state of untrammeled ecological function. Other important qualities include natural conditions and an undeveloped landscape with largely non-motorized uses. This is not an opinion, but rather a summary of the definition of the legal term "wilderness character," as jointly developed by the US Forest Service, National Park Service, Bureau of Land Management, and US Fish and Wildlife Service (Keeping it Wild 2, Landres et al 2016).

By including only the current Desired Condition, the Forest Plan is likely to add to existing confusion by inaccurately weighting management toward human experience and economy. Furthermore, it may create friction with the WSA Forest Plan Monitoring Question, which is currently answered using a national protocol tied to the definition described above.

To attain a balance more reflective of the meaning of wilderness character, and thus better aligned with both the Management Intent and Monitoring Question for the area, four or more companion Desired Conditions should address the biophysical values of the area. They might read:

"Ecological systems function without direct human manipulation. The landscape is undeveloped and appears primarily affected by the forces of nature."

Note: To achieve the greatest consistency with Alaska Region policy and the proposed plan's Management Intent, the language is derived from Section 2(c) of the Wilderness Act and the interagency definition of wilderness character. If it appears slightly redundant with the existing Desired Condition, remove from MA 1-DC-01 the words "in a natural environment of coastal rainforests and tidewater glaciers."

"Visitors primarily use non-motorized equipment and non-mechanized forms of transport, subject to ANILCA provisions, in an environment that offers high levels of challenge and risk."

Note: A non-motorized environment is a core component of the US Forest Service's definition of wilderness character. As public comment demonstrates, it is also highly valued by independent and commercial interests in the WSA. All special provisions of ANILCA are clearly protected. The proposed DC meets the 2012 Planning Rule Chapter 70 Section 74.1 direction for recommended wilderness.

"Evidence of modern recreational use is generally only visible in popular areas. Degraded sites are restored where feasible. Impacts are reduced through strategic commercial use allocation and public education."

Note: The DC addresses impacts to the WSA resource that have been well documented over time, that are shown to be increasing (Twardock, 2010), that are a frequent source of public/commercial complaint, and that CNF has the capacity to address. It aligns with the findings and recommendations of the Prince William Sound Framework and the Scoring Report for the 2012-2014 WSA Stewardship Plan and the goals of the interdisciplinary Draft 2016-2020 WSA Stewardship Plan. It meets the 2012 Planning Rule Chapter 70 Section 74.1 direction to protect recommended wilderness.

"Opportunities for solitude and primitive recreation are preserved or enhanced through management actions, strategic commercial use allocation, and public education."

Note: the DC addresses a core quality of wilderness character as described by the federal lands agencies. It aligns with the findings and recommendations of the Prince William Sound Framework and the Scoring Report for the 2012-2014 WSA Stewardship Plan and the goals of the interdisciplinary Draft 2016-2020 WSA Stewardship Plan. It responds to steady public feedback in recent years and public comment received during Forest Plan Revision. It meets the 2012 Planning Rule Chapter 70 Section 74.1 direction to protect recommended wilderness.

These concise additions should not be considered too weighty. Instead, they round-out the currently inadequate description of desired conditions. Furthermore, they reflect the exact same treatment given to recommended Wild, Scenic and Recreational Rivers, as described in MA 2, where desired conditions reflect a blend of relevant policy and law.

MA 1 Standards and Guidelines

Issues

- oAt least one guideline is inaccurate.

- oThe proposed plan includes an inadequate number of guidelines to meet management intent, desired conditions, law and policy, or to address existing internal confusion about the WSA.

Solutions

Fix inaccuracy in MA 1-GL-01 by adding a clause to the existing sentence (see below).

Add Standards and Guidelines for group size, fisheries projects, heritage, special uses, and motorized uses.

Discussion

MA 1-GL-01 is inaccurate. The Minimum Requirement Decision Guide (MRDG) is not used "when considering special use or administrative activity proposals within the WSA." The description is far too broad and will compound existing confusion, misinterpretation and inconsistency on the part of CNF managers. If followed, it would create undue work. A more accurate description is:

The Minimum Requirement Decision Guide (MRDG) or similar minimum-tool analysis should be used when considering special use or administrative proposals for prohibited uses identified in Section 4c of the Wilderness Act and not specifically authorized by ANILCA, along with actions that manipulate natural processes.

This language aligns with Management Intent, Desired Conditions, ANILCA, and Alaska Region WSA policy. Not including it would be a fatal flaw comparable to the current inaccurate language. Within the US Forest Service, the MRDG is the primary management tool for lands managed for wilderness character. It provides simple and essential guidance for analysis of proposals to ensure they meet the rigors of wilderness character. It is also important for fulfilling the Forest Plan's monitoring question requirement.

Add the following standard:

"Group size shall be limited to 15 people."

Note: This is consistent with CNF practices since the early 1980s. It is an issue frequently raised by

independent/commercial entities for many years, including during recent comment periods. It is essential for protecting the social and physical conditions associated with wilderness character, especially considering the increased public use since the opening of the tunnel to Whittier (see Assessment) and the limited and fragile areas for camping along WSA shorelines. Not including this standard would likely allow continued degradation of wilderness character. It would also allow establishment of practices inconsistent with designated wilderness, thus threatening fulfillment of Alaska Region policy to preserve suitability of the WSA for inclusion in the NWPS.

Add the following standards and guidelines for fish habitat improvement or enhancement projects:

o"While evaluating the need for aquaculture projects and fish habitat improvements, availability of suitable opportunities outside of the WSA should be considered."

o"When improvement or enhancement of fish habitat is authorized, it shall be designed and maintained to limit impacts to wilderness character per ANILCA and Alaska Region manual direction."

Note: These are essential clauses. Both ANILCA and Alaska Region policy allow fisheries enhancement projects but require protection of wilderness character. The direction represents a tension inherent in managing national forests in Alaska for their wilderness character. Additionally, CNF has not always upheld its obligations for preserving wilderness character while authorizing, maintaining or overseeing fisheries projects. As a result of the complex directive and the local history, it is important that the Forest Plan include standards and guidelines associated with WSA fishery projects. It is also essential to provide guidance for other agencies operating within the WSA and fulfills the need to highlight the State of Alaska/USFS Statement of Expectations from 09-12-2003. Also meets 2012 Planning Rule Chapter 70 Section 74.1 to protect recommended wilderness.

Add the following standard for heritage resources:

"Heritage resources shall be maintained in an undisturbed state and as a feature of wilderness character with no on-site interpretation."

Note: The WSA hosts many unique and valuable heritage resources, and methods of preservation will remain a topic of discussion into the future. Because heritage resources fit squarely within the definition of wilderness character, the Forest Plan should offer managers and the public a clear and concise standard for how they are managed. Also meets 2012 Planning Rule Chapter 70 Section 74.1 to protect recommended wilderness.

Add the following standard for Special Uses (recreation)

"Commercial services shall only be authorized to the extent necessary for realizing recreational or other purposes of the area."

Note: The CNF struggles to keep up with permit renewals, applications, inspections, and non-compliance issues for permitted activities. At the same time, nearly all coastal areas of the WSA are currently authorized for commercial use. Crowding, conflict and competition among visitor groups is well documented in certain areas and detracts from wilderness character. The current EA and Carrying Capacity related to commercial allocations in the WSA are badly outdated and contain flaws making them inconsistent with preserving wilderness character. In light of the challenges, CNF does not have a strategy for commercial use allocations in the WSA, except for the recommendations of the Prince William Sound Framework. The challenges are expected to persist or increase.

It is critical that the Forest Plan Revision Team recognize the lack of strategy for commercial use allocation and include basic standards or guidelines consistent with the Management Intent, Desired Conditions, and Alaska Region policy for the area. The above sentence, and specifically its "extent necessary" standard, ties commercial use to a management standard derived from the Wilderness Act and aligned with the recommendations of the Prince William Sound Framework. It meets management needs, is within the scope of the planning effort, and creates CNF consistency with Alaska Region policy for preserving wilderness character. It is consistent with preserving social and ecological conditions in recommended wilderness, as described in the 2012 Planning Rule Chapter 70 Section 74.1.

Without the standard, proposed Forest Plan direction for the WSA is seriously inadequate.

Add the following standard for special uses:

Commercial filming in the WSA shall follow USFS national direction for commercial filming in wilderness and any applicable ANILCA provisions.

Note: Requests for commercial filming in the WSA have increased in recent years. Across the USFS Alaska Region and including within the WSA, such activities have impacted wilderness character. Permit requests are expected to continue. The Revised Forest Plan must provide decision-makers with guidance on the issue, as it is not always obvious to follow national direction. USFS commercial filming policies for wilderness (and the WSA) have changed a couple of times in the last decade. The language of the proposed standard is designed to embrace any changes that occur during the life of the plan.

MA 1 Motorized uses

Issue

The absence of any reference to motorized uses in the WSA is an egregious and problematic gap in the WSA management area description.

Solution

Add standards and guidelines for motorized uses

Discussion

Clear and compelling reasons support addressing WSA land-based motorized uses in the Revised Forest Plan:

1. First and foremost, Forest Service Manual policy for the WSA is unequivocal in its guidance on motorized uses and should be concisely referenced to reduce existing confusion, disagreement, and inconsistency in MA 1 management.

2. Second, many of the experiences and values described in the MA 1 Management Intent and MA 1-DC-01 are reliant on a generally non-motorized environment consistent with Alaska Region policy. Describing the Management Intent and Desired Conditions without supporting them with Standards and Guidelines related to motorized uses presents an utterly incomplete product.

3. Third, the proposed plan's description of Management Area Management Direction, under Suitability of Areas (page 41), leaves ample room for addressing motorized uses in the WSA. As an example, such uses are clearly addressed in MA 6 EVOS Acquired Lands. A confusing contradiction is created in the Forest Plan's different handling of MA 1 and MA 6 (and the solution is certainly not to eliminate the motorized references from MA 6).

4. Fourth, motorized uses are the most common source of both internal and public confusion and disagreement regarding the WSA. Partly, this is due to the unique requirements of ANILCA and the unique WSA designation. However, ANILCA and the WSA are not impossible to understand, and the Revised Forest Plan can offer concise direction. Otherwise, confusion and inconsistency will continue to hamper success in meeting the policy mandate and public expectation to preserve WSA wilderness character. A Forest Plan that does not address the issue fails to perform its primary function as a tool for decision-making.

5. Fifth, research and monitoring by the USFS, APU, and NOLS over the last two decades has demonstrated that motorized uses such as recreational chainsaw use (not authorized by ANILCA) and helicopter landings degrade the social and biophysical qualities of wilderness character at many of the most popular recreation sites within the WSA. Monitoring shows chainsaw use is persistent or increasing and has already affected potentially hundreds of beaches in the WSA. Also, drone use is well documented and the Forest Plan would be remiss not to anticipate its sharp increase in the near term.

6. Sixth, motorized uses are the most common topic raised in public comments about the WSA throughout the three-year planning effort, and especially in the most recent comment period. Both independent and commercial interests consistently raise concerns. Not addressing the issue ignores public concerns and undermines the recreation and tourism economy of western Prince William Sound.

7. Ignoring the expansion of motorized uses or introductions of new uses (drones) is counter to the requirements for the protection of recommended wilderness as noted in chapter 70 of the Planning Rule.

A solution is to add the following Standards and Guidelines for motorized uses:

"The land-based use of chainsaws, generators, and other hand-portable motorized equipment shall be prohibited

except:

For uses directly and necessarily related to the taking of fish and game as described in ANILCA Sec. 1316.
Under special use permit for necessary utilization of subsistence resources as described in R10 FSM 2328 (3)f).
Under special use permit for other approved and appropriate purposes"

"The use of drones in the WSA is prohibited except under special use permit."

Note: Drones are a new motorized use in the WSA and must be addressed to meet the 2012 Planning Rule Chapter 70 Section 74.1 direction to protect recommended wilderness and the clear public/business community desire to manage the entire WSA as generally non-motorized. Documenting the recent new and expanding use of drones is as easy as conducting the internet search, "drones Prince William Sound." For a recent example from Montana wilderness, see: <http://www.kulr8.com/story/31259652/montana-film-company-cited-for-illegal-filming-on-federal-lands>. For an example of drone regulations, consider that ADFG recently listed drones as illegal for the pursuit of game and fish.

"Use of snowmachines, when there is adequate snow cover or frozen river conditions, is allowable under ANILCA Sec 1110 for traditional activities, subsistence, or for travel to and from villages and home sites."

Note: A responsible Revised Forest Plan will anticipate continued or growing snow machine use in the WSA and respond with a concise expression of agency policy that will help the public and agency officials understand WSA management. Public comment during community meetings, scoping, and comment periods overwhelmingly shows a public desire for clear guidance. Public comment also addresses the USFS interpretation of ANILCA Sec. 1110a that allows recreation and sightseeing as traditional activities throughout the WSA. While that interpretation is subject to change, ANILCA will not change. The proposed language captures ANILCA intent but is general enough to embrace any change to USFS interpretation of the law. As recreational snow machine use is clearly a new and growing use in many areas of the WSA, the proposed language meets the 2012 Planning Rule Chapter 70 Section 74.1 direction to protect recommended wilderness and the clear public desire to manage the entire WSA to preserve its wilderness character.

"Mechanized transport and motorized equipment for administrative use must be approved by the Forest Service officer with delegated authority (see Alaska Region policy) and must include conditions to minimize impacts to the area's wilderness character."

"Helicopter landings in the WSA are prohibited except for emergencies, administrative activities approved by the appropriate line officer, mineral activities under an approved Plan of Operations, or under special use permit."

Note: Commercial and private landing of helicopters in the WSA is a well-documented source of conflict and degradation of wilderness character. The issue is raised repeatedly in public comment. The proposed language meets the direction of the 2012 Planning Rule Chapter 70 Section 74.1.

Some have argued motorized uses should not be discussed in the context of Forest Plan Revision, as they are being addressed later through travel management. But it is imperative that the Forest Plan Revision Team recognize that each of the above recommendations addresses special provisions of ANILCA or Alaska Region policy. As such, they are not issues of travel management as much as they are key components of WSA management. Addressing them in travel management would only add to confusion. Not addressing them here leads to an inadequate management area description and does not meet the 2012 Planning Rule Chapter 70 Section 74.1 direction to protect recommended wilderness or the clear public desire to preserve wilderness character throughout the entire WSA.

ANILCA 1110a

The US Forest Service Alaska Region interpretation of ANILCA 1110a as it pertains to snow machines is problematic for the WSA in the modern era. Specifically, its inclusion of recreation and sightseeing as ANILCA traditional activities allowable throughout the entire WSA does not meet the intended balance struck by ANILCA and clashes with preserving wilderness character. This has become clear during the last decade, as new snow machine technology and changes in south-central Alaska demographics have led to a sharp increase in snow

machine activity in the WSA. The use has expanded far outside what was traditionally occurring in the Lake Nellie Juan area at the time of ANILCA. No other national forest area in Alaska managed for wilderness character is affected by the interpretation as much as the WSA (the Stikine-LeConte Wilderness is affected, but not in the same way as the WSA due to the latter's easy access by highway).

In anticipation of continued or growing snow machine use in the WSA, along with projected population growth in south-central Alaska and likely continued technological improvements, the USFS Alaska Region should reconsider its interpretation of ANILCA Section 1110a. Consultation and consistency with the National Park Service Alaska Region is desirable. Traditional activities may include recreation, but must be constrained to the general areas of use established at the time of ANILCA.

Recreational Opportunity Spectrum

The entire WSA should be under the Primitive ROS class. Anomalies such as hatcheries, seasonal/traditional use of snow machines, communication sites, etc, can be referenced on the ROS map as allowable under the provisions of ANILCA.

The Primitive ROS class is necessary for meeting Alaska Region policy to manage the WSA in a way that preserves its eligibility for inclusion in the NWPS. Use of other ROS classes are likely to contribute to a continued degradation of wilderness character, specifically by limiting agency ability to manage for solitude opportunities and "extent necessary" commercial use allocations.

EVOS Acquired Lands

Issue

Current language risks legal violations by misrepresenting the Purchase Agreements for EVOS Acquired lands.

Solution

Under Management Intent, replace the "conservation and restoration purposes" with "conservation and wilderness purposes."

In MA 6 DC 2, MA 6 GL-04, MA 6 GL-05, MA 6 GL-06, replace the inaccurate "conservation and restoration values" with "conservation and wilderness purposes."

Discussion

Any language in this section must exactly mirror the legal language and intent expressed in the Purchase Agreements. Otherwise, the Forest Plan generates confusion and may encourage illegal activity.

Under Management Intent, the definition of Federal Conveyance Lands inaccurately says EVOS lands were purchased with "the primary goal of maintaining the land in perpetuity for conservation and restoration purposes." This wording is almost an exact quote from the Chenega, Eyak, and Tatitlek Purchase Agreements, except that the word "wilderness" in the Purchase Agreements has been replaced with the word "restoration" in the proposed Forest Plan.

While restoration is an allowable use of the EVOS Acquired Lands, and while restoration of injured resources was a purpose of the purchases, the Purchase Agreements irrefutably state that the primary goal into the future is to manage the lands in perpetuity for "conservation and wilderness purposes."

This is essential wording because it establishes a managerial hierarchy wherein the "conservation and wilderness purposes" of the lands hold supremacy over allowable uses such as unspecified restoration. It is also essential because "wilderness" remains an unrecovered injured resource according to the EVOS Trustee Council, of which the CNF is a member. In this context, the EVOS TC draws clear alignment with the principles of

the 1964 Wilderness Act and specifically includes the WSA as an example. Several EVOS Acquired parcels are within the boundaries of the WSA. And all EVOS Acquired lands were purchased to restore injured resources, including very specifically "wilderness."

It is essential that the Revised Forest Plan properly describe the "conservation and wilderness" purposes of MA 6 lands because certain restoration and enhancement activities performed by CNF do not appear consistent with the Purchase Agreements. The proposed Forest Plan language would likely and misleadingly allow such activities to continue.

Incidentally, the second sentence in the definition of Federal Conveyance Lands uses the correct "conservation and wilderness purposes" language. This creates a confusing contradiction within the definition that must be fixed.

MA-6 DC 2

This Desired Condition is inaccurate. The Purchase Agreements do not direct restoration of any resources specific to EVOS lands. The purpose of the purchase was itself an act of restoration, and restoration is allowable under certain circumstances. But this DC implies a management purpose is to restore resources. Even more importantly, absolutely no direction exists in the Purchase Agreements to enhance resources. Enhancement activities, which have recently occurred on EVOS lands, conflict with the Purchase Agreements. The desired condition of these lands is management in perpetuity for their "conservation and wilderness purposes."

MA 6 GL-04

The inaccurate terminology "conservation and restoration values" needs to be replaced with "conservation and wilderness purposes," otherwise it is in disagreement with the Purchase Agreements. It also creates confusion by contradicting the language of MA 6 GL-01, which correctly refers to "conservation and wilderness purposes."

MA 6 GL-05

Inaccurate "conservation and restoration values" must be replaced with "conservation and wilderness purposes."

MA 6 GL-06

Inaccurate "conservation and restoration values" is used twice. It should read "conservation and wilderness purposes."

Glossary

It is vital that the glossary include a definition of "wilderness character." It might look something like this:

Wilderness character shares the same definition developed nationally by the four federal lands agencies and drawn from the statutory language of the 1964 Wilderness Act. It comprises the following five qualities:

- oUntrammeled: ecological systems are essentially free from direct human control or manipulation.

- oNatural: the landscape appears to be affected primarily by the forces of nature.

- oUndeveloped: is essentially without permanent improvement, modern human occupation, and most motorized uses, to the extent consistent with ANILCA and the 1964 Wilderness Act.

- oSolitude: Provides outstanding opportunities for solitude or primitive and unconfined recreation.

- oOther Features: Retains other features of ecological, geological, scientific, educational, scenic or historical value that contribute to wilderness character.

Or, look at Keeping It Wild 2 (Landres et al) (page 7) for more USFS wording.

The Wilderness Study Area MA comprises approximately 37% of the Chugach National Forest, making it among the most important of the Forest's management areas. Without a doubt, the most important phrase in the MA description is "wilderness character." It is the linchpin of area management. Including it in the glossary is one of the easiest ways to dispel confusion and disagreement about the designation and meet basic Planning Rule

requirements.

Several reasons support the need:

olt is not a common term and cannot be found in any dictionary.

oThe term may appear subjective to readers in the agency and the public.

oThe term appears throughout the proposed plan, Assessment, and Wilderness Inventory and Evaluation. It is used as the central criteria for identifying, analyzing, recommending, and managing enormous parts of the Chugach National Forest.

olt is a legal term used in the 1964 Wilderness Act and ANILCA; it is also found throughout USFS Alaska Region and national policy. Considering the unique WSA designation, it is arguable that the term is more important to include in the Glossary than the current inclusion of the Wilderness Act.

olt has been a legal term for over half a century.

oThe USFS uses a nationally agreed-upon definition shared with BLM, USFWS, and NPS. It is unlikely to change significantly in the coming years.

oThe Forest Plan monitoring question uses the framework of the above definition to shape monitoring of the WSA.

oThe Glossary includes several terms specific to Wild, Scenic and Recreation Rivers, including "outstandingly remarkable values" from the Wild and Scenic Rivers Act. Including a critical component of the WSR Act but not including the same for the Wilderness Act, especially considering its importance to WSA management, is a glaring contradiction. WSR Act and TW Act share similar intent, legislative histories, and management implications.

The Glossary includes definitions for simple and commonly used terms such as background, channel, economy, erosion, forage, geologic, implement, terrestrial, and others. If space is an issue, any one of those could be removed to fit a definition of wilderness character. Any one of these terms is in common usage and does not carry a particularly unique definition related to forest planning, but just the opposite is true of wilderness character.

The exclusion of wilderness character from the glossary weakens the proposed plan, fosters confusion about the designation, muddles decision-making, and is negligent.

Conclusion

The Forest Plan Revision process highlights the complexity, importance and popularity of managing the WSA for wilderness character. It demonstrates that today's managers are temporary shareholders of a storied and highly valued landscape. Inherent in their role is an obligation to support a multi-generational desire to treat western Prince William Sound with the utmost care and restraint, managed in close affiliation with the language and intent of the 1964 Wilderness Act and the provisions of ANILCA.

Public comment over recent years also clearly describes deteriorating conditions in western Prince William Sound. It emphasizes the need for the Chugach National Forest to produce a plan that minimizes confusion and maximizes preservation of wilderness character in the years ahead. It should also move the US Forest Service to recommit that all employees and partners working in the WSA and EVOS Acquired Lands have the best training and knowledge of the history and management intent for these special places.

Thank you to the entire Forest Plan Revision Team for its hard work performed under challenging time constraints. And thank you for the opportunity to comment.

Sincerely,

Tim Lydon
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