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Comments: Thank you for the opportunity to comment on the proposed Forest Plan. I work for the Society for Wilderness Stewardship and this past summer I had the privilege of working in close partnership with the Glacier Ranger District of the Chugach National Forest to monitor recreation sites and their impacts in the Nellie Juan-College Fiord Wilderness Study Area (WSA), and to analyze conditions and trends of those monitored recreation sites using both legacy data from the past 20+ years and data collected from the 2018 field season. In addition to my professional experience in the WSA, I was a user and recreationist of the area on solo kayak expeditions in my free time. For me, 2018 was my first experience with the WSA but the past six months have been a complete and total immersion into the WSA from a variety of perspectives that include cultural, managerial, social, and ecological conditions.

I preface with this short background to give a sense for the basis of my comments, especially as a wilderness professional and non-Alaskan native. The comments that follow reflect my own personal views; they are drawn from both professional and personal perspectives and experiences of wilderness, but are my own and do not necessarily represent the opinion of my organization, the Society for Wilderness Stewardship.

First off, I'd like to applaud the Forest Plan Team for your work on the forest plan and your commitment to transparency and public involvement. This was a massive undertaking that required careful planning, thought and teamwork; the comprehensive Draft Land Management Plan (LMP) reflects these efforts. Some particularly strong elements of the Draft LMP, as it pertains to the WSA, are:

- * The desired conditions (p. 25) to the extent that they provide for natural conditions free from human manipulation (item 5), opportunities for solitude and primitive recreation (item 1), an undeveloped landscape (item 5), and minimizing the impacts of authorized use of mechanized or motorized equipment (item 3)
- * The management approach that will an interdisciplinary wilderness study area stewardship plan that will guide stewardship activities using best management practices and national protocols for designated wilderness (p. 50)
- * The commitment to prevent and apply treatments for invasive species when necessary (p. 25 and 50)
- * The objective to prohibit landing of helicopters and drones within the WSA.

For areas of improvement I have three specific comments for the LMP as it pertains to the WSA, or Management Area 1 as it is referred to in the LMP:

1. I recommend that the Chugach National Forest keep language from both the 1984 and 2002 plans where the WSA is managed to maintain [ldquo]presently existing wilderness character.[rdquo] The currently proposed plan omits the word [lsquo]wilderness[rsquo] and describes the WSA as being managed to maintain [ldquo]presently existing character.[rdquo] This change is apparently based on the current Alaska Region supplement to Forest Service national wilderness policy (p. 24 of the LMP) that says the WSA shall be managed to maintain

[ldquo]presently existing character,[rdquo] but ignores the very next sentence of that same supplemental policy and its intent to [ldquo]follow the same direction provided for wildernesses by ANILCA.[rdquo] Under ANILCA Sec 102 (13), wildernesses established by ANILCA [ldquo]have the same meaning as when used in the Wilderness Act[rdquo] and therefore necessitates that the WSA be managed to maintain and preserve its wilderness character (Sec 4(b) of the Wilderness Act).

In addition to the legal obligation, there are also at least two practical reasons to manage for wilderness character, as opposed to existing character:

1. [ldquo]Existing character[rdquo] is ambiguous and open to any number of interpretation leaving room for not only confusion but a widely differing assortment of opinions as to what the existing character was, and how to achieve some sort of static environment based on a fixed point in time. [ldquo]Wilderness character,[rdquo] on the other hand, implies a desired condition with a clear definition based on five qualities described in the Wilderness Act itself (Natural, Undeveloped, Untrammeled, Opportunities for Solitude and Primitive Recreation, and Other Features). Moreover, wilderness character can be monitored and its trends assessed to provide management with a sense of whether or not the desired conditions are being met or if management actions are having desirable effects. For more on wilderness character and its definition, see the overview on p. 7 of USFS General Technical Report RMRS-GTR-340 (https://www.fs.fed.us/rm/pubs/rmrs_gtr340.pdf).
2. From an ecological standpoint, we cannot and should not manage ecosystems and landscapes to maintain presently existing conditions. We understand ecosystems well enough by now to know that they are dynamic and constantly evolving systems that shift and change over time. The tidewater glaciers of the WSA that have been rapidly receding and the effects of climate change on this landscape in recent years are perfect examples of how conditions change over time. Managing to preserve existing conditions is not good ecological practice and by managing to preserve wilderness character, we can more readily apply adaptive management practices that adjust as new information is available[mdash]it allows us to manage for desired conditions even when [ldquo]naturalness[rdquo] or existing conditions are a moving target.

1.

The Forest Plan should include a commitment to monitor wilderness character and conditions related to wilderness character. On numerous occasions the LMP describes its intent to [ldquo]maintain presently existing character [which, again, should be changed to wilderness character] and potential for inclusion in the National Wilderness Preservation System.[rdquo] This begs the very simple question of, [ldquo]How do we know we are maintaining character if we are not monitoring?[rdquo]

Just two examples of major impacts to the WSA are the Exxon Valdez Oil Spill in 1989 and the opening of the Anton Anderson Memorial Tunnel to vehicle traffic in 2000[mdash]in both instances, there were far-reaching effects on the [ldquo]presently existing character[rdquo] of the WSA. These are things to keep an eye on and by doing so we can make corrective actions. Only by monitoring can we tell if we are meeting objectives and desired conditions.

National and interagency protocols for monitoring conditions and trends related to overall wilderness character have come a long way in recent years. In 2018 the Forest Service began implementation of its wilderness

character monitoring program to establish wilderness character baselines for all 445 Forest Service wildernesses by 2022, and a five-year rotation of trends assessments after that. One thing that has come to light in this initiative are the abundance of data gaps in conditions related to wilderness character and the shifting baselines that have occurred but not been documented since wilderness designations. The Chugach NF and imminent Forest Plan has made clear its desire to recommend most or all of the current WSA for inclusion into the National Wilderness Preservation System; as part of this objective, the Chugach NF has an opportunity to learn from mistakes and oversights in past wilderness management from within its own agency, and showcase a premier wilderness area with premier monitoring programs, data, and management.

3. The Forest Plan should address the unauthorized use of chainsaws in the WSA. In the last six months, I saw countless signs of past chainsaw use that leaves long lasting and irreparable impacts on the primitive and undeveloped qualities of wilderness character. This is especially true in cases where chainsaws have been used to cut down [ldquo]earthquake trees[rdquo] that have been preserved in place as a result of the 1964 earthquake. These [lsquo]earthquake trees[rsquo] capture a historical and cultural feature of value for the WSA, and it is unacceptable to lose these features to unauthorized use of motorized equipment. Please consider revising the final LMP to include an official position that prohibits unauthorized chainsaw use in the WSA, and a plan to enforce the prohibition.

Once again, thank you for the opportunity to provide input on the draft forest plan and your commitment to public involvement in the forest planning process.