

Data Submitted (UTC 11): 10/31/2018 8:00:00 AM

First name: Debbie

Last name: Miller

Organization:

Title:

Comments: Dear Chugach National Forest Supervisor and planning team,

Thank you for all your good work in developing a new management plan for the Chugach Forest. I strongly support Alternative D which recommends that 97% of the Nellie Juan College Fjord Wilderness Study Area be formally designated as Wilderness. After spending five summers exploring this remarkable place, it clearly deserves lasting protection for future generations.

I've attached a letter with more thoughts on the objectives of the management plan and the importance of maintaining the wilderness character of the WSA.

Sincerely,

Debbie S. Miller, Artist-in-Residence for Chugach National Forest 2014-2015

Thank you for all your work in the creation and adoption of a new management plan for the Chugach National Forest. As a 43-year Alaskan who loves Alaska's wild places, I truly appreciate the time and energy it takes to be good stewards.

During the summers of 2014 and 2015, I was honored to be an artist-in-residence for the Chugach National Forest. This was an extraordinary experience which led to the creation of our book *A Wild Promise: Prince William Sound (Braided River, 2018)* with beautiful photographs by Hugh Rose. I've enclosed a copy of that book to be included as part of the official public comments record. The words and images of *A Wild Promise* reflect the incredible wilderness value of the Nellie Juan College Fjord Wilderness Study Area (WSA). Many thanks to the Forest Service personnel who supported my work.

During the course of my research, which spanned five years between 2013 and 2017, I camped, kayaked, boated, and hiked throughout the WSA, with more than 50 different anchor points in some of the most spectacular, primitive wilderness I've ever experienced. It's certainly understandable why Congress set aside the Nellie Juan College Fjord Wilderness Study Area in 1980. After nearly 40 years, this wilderness jewel of the National Forest System is still a "study area" when we clearly know that this magnificent area may best represent our most wild and roadless forest in the entire U.S. It also holds the largest concentration of tidewater glaciers in North America with a rich diversity of wildlife associated with numerous

glacial fiords. This stunning place is amazing for all who bear witness to it, including the millions of passengers on cruise ships who visit Alaska from all over the world.

It's important to note that nearly every national forest in America has specific designated wilderness areas. There are 445 wilderness units managed by the Forest Service, including 19 wilderness areas in our largest forest, the Tongass National Forest. The Chugach National Forest is the nation's third largest forest, yet ironically, not one, single acre of the 5.4 million-acre forest has been formally protected as Wilderness. The Chugach de facto wilderness has been largely overlooked. That being said, it's great to see that your draft management plan includes Alternative D which recommends that 97% of the WSA be designated and fully protected as official Wilderness. These lands clearly meet the Wilderness criteria --- they are primitive, wild, roadless, untrammelled, unspoiled, spectacular --- no one can deny that this is one of Alaska's, and our nation's, most treasured natural areas.

I support Alternative D and urge the Forest Service to maintain the existing wilderness character of the WSA. This means that it's crucial to continue monitoring activities and recreational use of the area. Without regular monitoring, the WSA will be degraded with increased public use. During my time with the Forest Service, I assisted with a number of different studies and clean-up projects. I was incredibly impressed with the work of the Forest Service, and saw how such work helps maintain the wilderness character of the area. In particular, I'd like to note some of my personal experiences with monitoring activities:

1. Cleaning up camp sites: while many campers practice [ldquo]leave-no-trace[rdquo] ethics, we did discover some messy camps. In particular I helped clean up an abandoned bear bait station where the sloppy hunters had built a treehouse, left trash, and a scarred ring of vegetation around the baiting area. I was surprised that this kind of activity could happen in a wilderness study area, not far from where kayakers might have a campsite unaware that bears might be in close proximity, lured by the smell of the station. I urge the Forest Service to advocate for a closure prohibiting bear baiting throughout the WSA through ADF&G. A few of the fiords, such as Harriman Fiord, are already closed to bear baiting. This kind of hunting practice utilizing bear attractants poses a safety risk to other recreational users. Such a method of take also damages the wilderness character of the area.
2. Group size for camping needs to be addressed: while in Blackstone Bay it was evident that there was a fair amount of day use and overnight camping. Since Blackstone Bay is in close proximity to Whittier it makes sense that this is a good day-use area. However, the Forest Service should consider limiting group size for overnight camping given the nature of Blackstone Bay and available campsites. A group of 15 is acceptable for a day hike, but 15 people camping in one location, repeatedly, will cause damage to the wilderness resources. The Forest Service is commended for providing the toilet bags and food storage containers for campers, and for sending a strong [ldquo]leave-no-trace[rdquo] message. But at a certain point the numbers of campers must be addressed and limited for everyone's enjoyment and to protect the land and wilderness experience.
3. Air quality and Cruise Ship Emissions: During the summer of 2014, I helped with a lichen sampling study to help monitor the emissions of cruise ships. I also was an enrichment lecturer on two cruise ships this summer. As the industry hopefully strives for cleaner emissions, it's important that the Forest Service monitors air quality and the smoke from these floating cities, and other sources. Such monitoring studies are important for the health of the forest and its inhabitants.
4. Elodea and other invasives: On another 2014 research project, the Forest Service sampled a number of different lakes in the WSA for the invasive Elodea, which clogs and destroys the healthy growth of native lake plants. Fortunately, there was no sign of Elodea in the sampled lakes. European slugs were another invasive

pest that the Forest Service worked to control with the help of other volunteers. These are important studies and I support this Forest Service work in maintaining the wilderness character.

5. Beach Clean-up work: We cleaned up a number of beaches in 2014 and 2015 and this certainly helps to maintain the wilderness character of the area. I support the Forest Service's annual clean-up endeavors as part of their management objectives.

EVOS acquired lands and wilderness purpose:

In addition to supporting Alternative D, I urge the Forest Service to strengthen this wilderness alternative by including the EVOS acquired lands under the Chenega purchase agreement. These acquired inholdings lie within the boundaries of the WSA and should be managed by the Forest Service in perpetuity for conservation and wilderness purposes, as required in the purchase agreement. It makes sense to add these contiguous wilderness lands as part of the WSA, not in a separate category. The Forest Service should also seek additional restoration funds to obtain the subsurface rights of these acquired lands, and any other inholdings that have significant habitat and wilderness resources in the Chugach National Forest.

During my exploration time in Prince William Sound, I visited Jackpot Bay, Paddy Bay and Hogan Bay --- these beautiful acquired inholdings have significant habitat and a strong wilderness character. Jackpot Bay is home to four species of salmon and offers great spawning habitat through the rivers, streams and associated lakes that feed into the bay. These three bays are great examples of the acquired lands within the Chenega purchase agreement that should be managed for their conservation and wilderness purposes within the management parameters of the WSA.

Snow Machine Use:

It has come to my attention that there is confusion about snow machine use in the Chugach National Forest. Many snow machine users mistakenly fear that under the new draft plan snow machine use will be restricted in areas that are presently open to snow machine access in the Chugach National Forest. This is simply not the case and I urge the Forest Service to immediately clarify this to those recreational users who are mistaken.

There is plenty of snow machine access along the road corridors surrounding the WSA. Places such as Turnagain Pass and Spencer Glacier have always been open to snow machine use and this will not change. About 65% of the Chugach National Forest is open to regular snow machine access near existing roads between Seward and Whittier, near Valdez and Cordova. The Nellie Juan College Fjord Wilderness Study area represents 35% of the Chugach National Forest and most of this land is remote and not accessible to snow machines due to the terrain and lack of roads.

There is plenty of room in the Chugach National Forest for all recreational interests. Some areas should be closed to motorized access, while others should remain open. The Forest Service should continue to manage the forest with a balanced approach so that the interests of hikers, skiers, campers, boaters, kayakers and snow machine users are respected in a fair manner.

Last, I urge the Forest Service to do all it can to protect the wilderness character of the Nellie Juan College Fjord Wilderness Study Area until such a time that Congress designates the area as a formal Wilderness.

Thank you for your continued management of this incredible national treasure.

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