

Terri Marceron
Chugach National Forest
161 East 1st Ave
Anchorage AK 99501

10/28/2018

Dear Terri,

Please accept my comments on the proposed draft Land Management Plan and draft EIS for the Chugach National Forest. I have been recreating, studying, writing about, and working in all parts of the Forest, though primarily western Prince William Sound, since 1985. I believe this will be at least the 2nd plan that I have commented on. I will focus my comments on western PWS, though in general I encourage the Forest to maintain and improve wilderness values such as solitude, quiet, and minimally impacted ecosystems thru out the Forest.

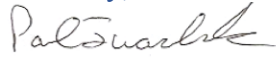
The proposed plan weakens the wilderness protection of the Nellie Juan-College Fiord WSA by setting a standard of “presently existing character,” versus wilderness character. This is a HUGE change, and very concerning. The proposed wording is vague, especially since the character of a particular place will change from year to year. This opens the door for really no standard at all. It endorses a pessimistic view of the WSA: one that accepts a decline in wilderness values. For instance if (or one might say when) another major oil spill occurs the proposed language could be interpreted by future managers (and lawyers) that no effort to clean up the damage on FS lands is required. I urge that a higher bar be set, one that maintains and improves wilderness values.

The inclusion of monitoring in the plan Forest wide is commendable. However the plan seems to de-emphasizes monitoring in the WSA, if not eliminating it entirely. This seems to assume, once again, a stagnant ecological condition. Forest staff must be informed by long term monitoring in order to develop and implement effective and efficient management actions. In my 30 years of monitoring recreational impacts more than once a user or CNF staff member has claimed that an particular spot has been “trashed,” and proposed expensive and time consuming plans for the spot. When in fact our long term monitoring has shown that the proposed actions were not needed, generally because the impacts were temporary. Other times we, along with data from FS staff, have been able to identify and implement more subtle management actions for spots that had significant change occurring.

I also urge that lands purchased with EVOS funding be kept in the WSA and be included in any recommendation of Wilderness. Jackpot Bay, Paddy Bay, and Knight Island have high values of solitude, quiet, habitat, and other important wilderness values. Removing them from the WSA and Wilderness recommendation seems counter to the reason they were purchased in the first place. I support the idea of a stewardship plan, and the wilderness recommendation in Alternative D of the draft EIS with the inclusion of lands around Jackpot Bay, Paddy Bay, and Elrington Island, Knight Island, and Nellie Juan Lake area.

I general I applaud the Forest Service's effort to devise a reasonable and well rounded plan. Thank you for considering my comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul Twardock", with a stylized, flowing script.

Paul Twardock

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