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Comments:

Dear Forest Supervisor Terri Marceron:

Thank you for the opportunity to comment on the proposed Chugach National Forest plan. Thank you also for leaving intact the commitment to preserve the "wilderness character" of the Wilderness Study Area in Prince William Sound. However, I am concerned that protections for the WSA appear weakened.

Please amend the proposed WSA Management Intent to affirm the area will continue to be treated as wilderness until Congress reaches a final decision on its protection. As stated in the existing (2002) Forest Plan, management should be controlled by the Forest Service regional manual direction. This clearly supports the long-standing policy of modeling WSA protection after the Wilderness Act, with special ANILCA provisions. This has been the Chugach National Forest policy since 1984.

As stated in the 2012 Chugach National Forest Assessment and the 2015 Wilderness Area Inventory and Evaluation, Prince William Sound has experienced increased visitation and pressure on resources since the 2000 opening of the Anton Anderson Memorial Tunnel to Whittier. Now is a time for maintaining current protections.

The Forest Plan should also clarify the WSA policy for all land-based motorized uses such as chainsaws, helicopters, and drones. Such uses are increasing, affecting both ecological and social conditions and necessitating a response from the Forest Service. Section 74.1 of the 2012 National Forest Planning Rule clearly gives the Chugach National Forest the authority to address such issues through the Forest Plan.

Recreational use of snow-machines in the WSA has also increased considerably since the 2002 Forest Plan. The Forest Service should re-visit its liberal interpretation of ANILCA Section 1110a and include a clear statement of allowances in the revised Forest Plan. While ANILCA allows snow machine use for "traditional activities" in the WSA, the current Forest Service interpretation could allow unlimited recreational and sightseeing use of snow machines. This would clash with current values and uses.

The Forest Service should reverse the proposal to allow personal use timber harvests and manipulation of watersheds, soils, and habitats in the Wilderness Study Area. If certain such uses are allowed under limited circumstances, including fisheries habitat projects, the Forest Plan should include clear standards and guidelines to protect the values of the WSA.

The Forest Plan should also acknowledge and uphold the goals of the 1994 Exxon Valdez Oil Spill Recovery Plan, which promises to restore the conservation, recreation, and wilderness values of Prince William Sound and specifically the WSA.

Regarding the lands purchased following the Exxon Valdez Oil Spill, including those within the WSA, the Forest Plan should encourage acquisition of their subsurface title from willing sellers. This is to protect the lands from mining. Such lands should also be managed to protect their conservation and wilderness values, as directed by their original purchase agreements.

The entire WSA should be removed from mineral entry until Congress determines the area's protections. Mining is contrary to the current uses and values of the WSA, including subsistence, recreation, fishing, tourism, and enjoyment of wilderness. Mining activity could disqualify lands within the WSA from wilderness protection, which would contradict the purposes of the WSA designation.

Lastly, please recommend to Congress continued and permanent protection of the entire WSA. This should include Knight Island, Glacier Island, Perry Island, Columbia Glacier, Esther Island, Port Wells, Lake Nellie Juan, and the mainland along Knight Island Passage. The 2015 Wilderness Inventory and Evaluation describes the high degree of wilderness character in these areas and their current value as wilderness. Yet, in 2002, the Forest Service recommended withholding these areas to provide for mining, helicopter skiing/hiking, and development of tourism infrastructure. Those uses contrast the current value of those areas to subsistence, recreation, fishing, and tourism.

Thank you for the opportunity to comment.

Sincerely,