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Chugach National Forest's Supervisor's Office

Attn: Forest Plan Revision

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Comments Regarding the Chugach Revision Plan #40816

We are very appreciative to have this opportunity to comment for the Eyak Preservation Council. EPC is a non-profit organization based in Cordova, Alaska. Our work and organization was inspired by the devastating Exxon Valdez oil spill in 1989, and the founders vowed to protect wild salmon habitat in the eastern geographic region of the Chugach National Forest, which was the ancestral home of the Eyak people. Since then, EPC's mission has expanded to help in any way we can to preserve wild salmon habitat throughout the Chugach National Forest, and with the networking and partnership with other organizations and people, everywhere. Included in this mission is a commitment to help maintain and build resilient communities, which will plan towards the future by promoting sustainable solutions that will preserve productive and bountiful ecosystems.

Our overall statement about the 2016 Revision plan is that it is lacking in strong and clear direction on how to implement the conservation strategies put forth, and that it lessens the available areas that should be protected by Wilderness protections, and it needs to come out and mandate protections for land acquisitions that would protect the amazing wild salmon, and hatchery salmon, habitat that is able to proliferate here because of the current nature of the Chugach National Forest.

We must never forget - this region, our Chugach National Forest - is one of a mere handful of relatively pristine forest and glacial areas that support the last commercially viable wild salmon returning regions in not only North America but on the PLANET.

We must preserve it to the very best of our ability for current and future generations. And the U.S. Forest Service has this awesome responsibility, and the opportunity, to do so.

Overview:

The original 1.9 million acre Wilderness Study Area (WSA) of western Prince William Sound (PWS) should be recommended for congressional designation as wilderness; the WSA should be managed as wilderness until it is congressionally designated; the Copper River/Bering River area should be protected; additional protective acquisitions should be identified; the entire Forest should be withdrawn from mineral (including oil & gas) and forestry activity; additional Wild and Scenic River designations should be recommended on some of the rivers; and the Exxon Valdez Oil Spill (EVOS) Restoration mandate for the region must be upheld.

We are requesting rewrites to clearly explain vague prescriptions for protection throughout the document. As but one example (pg. 33) Standards and Guidelines for Goal 2; Minerals:

Guideline FW-G2-GL-02: Surface disturbance for mineral exploration and mineral extraction should be minimized. With the initiation of allowed mineral activities, there should be reasonable regulation of surface occupancy and use in order for the mineral activities to be compatible with forest wide and management area desired conditions as much as practicable.

Although, as we state in this letter we are against any mining in the CNF, this paragraph is an example of vague

verbiage that is also throughout the document.

One: should be minimized is entirely up to who's interpretation? Also: as much as practicable. What and where are the clear guidelines for minimized and practicable?

In other areas regarding mineral "development", there is mention of "legal mandates." Although laws may be present, and hopefully enforced, they cannot completely mitigate the damage mineral extraction does to natural habitat.

As many with experience, science knowledge and courage are willing to state, there is no way to practicably minimize habitat damage regarding mineral, gas and oil exploration in sensitive, pristine and salmon habitat regions. Let's stand with the truth - there are accidents, illegal expansions, spills, toxins, roads, illegal bypasses; there is no way to protect our region when mining, gas and oil exploration is allowed, at all.

#### Specific Comments

1. Western PWS Wilderness Recommendation -- The Forest Plan Revision should recommend western PWS in its entirety for congressional designation as Wilderness, including all of the original 1.9 million acres in the Nellie Juan-College Fjord Wilderness Study Area (WSA) established in 1980 by ANILCA. The Proposed Plan Revision recommends only 1.4 million acres as available for Wilderness designation, removing Knight Island, Port Wells, Harriman Fjord, Columbia Glacier, Glacier Is., Perry Is., Eshamy, etc. from its Wilderness recommendation. All of these areas should be returned to the official Wilderness recommendation.

Since the 1980 ANILCA, the Forest Service mandate has been to manage the 2?million acres of the Wilderness Study Area (WSA) in western PWS as Wilderness. The public has come to expect it. But now the Forest Service wants to remove Wilderness protections entirely from nearly a third of the area. The Plan proposes?to split the area into two separate units and remove some of its most scenic, recreational and biologically rich areas. This is unacceptable, and must be remedied.

In addition (as discussed below in section 2.a. Existing Wilderness Management), the Forest Plan proposes to loosen protections across the entire WSA.

The Forest Plan Revision proposes to permanently remove the five following areas from Wilderness protection (see Plan's Wilderness Area Inventory and Evaluation, and 2002 ROD). This proposal must be reversed:

A. Knight Island: Knight Island has some of the best wilderness character on the entire Chugach National Forest, and has been valued as Wilderness for decades. The Forest Service acknowledges the area's outstanding wilderness character in the proposed Plan's Wilderness Area Inventory and Evaluation. USFS rationale for removing current protection is to make Knight Island available to mineral extraction. This ignores the current economic benefit of Knight Island to recreation, commercial fishing and the tourism economy.

The proposal to remove Knight Island removes a crown jewel from the WSA. Knight Island hosts unique biota, geology, scenery, and outstanding opportunities for subsistence, hiking, kayaking, camping, hunting, birding, safe anchorages, and more. And as PWS has become busy with motorboats following the opening of the Whittier tunnel road, Knight Island has remained a refuge from busier areas closer to Whittier. Its sheltered bays, islands and rugged peaks, with stands of ancient rain forest, would be a national park anywhere else in the world, and are enjoyed by thousands of Alaskans and their visitors every year. And Knight Island was the biggest island in PWS that is still enduring impacts from the Exxon oil spill. But while acknowledging all of this, the Forest Service proposes stripping protections so the area can be mined. This must be corrected.

B. Columbia Glacier: Also some of the best Wilderness character in the region, the Plan removes Columbia Glacier from Wilderness. USFS rationale for removing protections is mineral development and heli-skiing/hiking. Glacier Island nearby is also proposed to lose protections.

The proposal to remove protections from Columbia Glacier and nearby Glacier Island is a true travesty. The Columbia is world renowned -- the largest glacier in PWS, and rapidly receding. As it retreats, it is revealing an spectacular fjord complex with shore birds, migratory birds, marine mammals such as humpback whales, minke whales, seals, and orcas, terrestrial wildlife that includes wolverines, bears, and mountain goats, and a unique array of plants. Along with Glacier Island, it is also a favorite place for subsistence, camping, kayaking, hiking, sightseeing, camping, anchoring the family boat, and more. But the Forest Service wants to remove the upper

basin, which is becoming a fjord, from protections to assure mining and helicopter skiing and hiking can replace current non-intrusive uses. Nonsensically, it wants to remove Glacier Island to provide for subsistence, even while the current protections are the best way to preserve subsistence activities and resources permanently into the future.

C. West Port Wells: The Forest Service wants to remove much of the land surrounding Port Wells and Esther Island and Perry from current protections. These lands are within a day trip of Whittier and host stunning scenery, recreation cabins, marine mammals and seabirds, terrestrial wildlife, and some of Prince William Sound's most spectacular opportunities for hiking and camping. They include Harrison Lagoon, Hummer Bay, and other favorites. The area's calm bays and lagoons are part of a unique migratory flyway linked to nearby Harriman Fiord and they contain dozens of wild salmon runs. Keeping these lands under current protections benefits commercial fishing, subsistence, and a lucrative recreation and tourism industry. And the Forest Service reason for eliminating protections is largely to provide for mining, and because the lands are within a single day's boat trip of Whittier. By that obtuse reasoning, only lands more than a day trip away from Whittier should be protected for the thousands of Alaskans who have recreated and worked in these areas for decades. That is irrational.

D. Main Bay: The mainland near Eshamy and Main Bay is currently slated to lose protections. While it might be understandable to remove the area immediately around the Main Bay Hatchery, the area actually proposed to lose protections is far too extensive. It contains some of PWS' best wild sockeye runs and cutthroat trout lakes and rivers. It is a refuge for black bears, which have been eliminated from many other areas in PWS due to loose hunting regulations. It hosts idyllic beaches and islands for camping and mainland valleys for subsistence and sport fishing and Wilderness recreation, all benefiting under current protections. Its healthy sockeye, chum and pink salmon runs provide food and jobs through PWS's commercial fishing. The Forest Service claims these many miles of shoreline are too close to the fish hatchery to be protected, even though they've thrived under current protections for over 35 years.

E. Nellie Juan Lake: Lake Nellie Juan is among the most remote places in the PWS watershed. It is a biologically rich valley corridor linking PWS with the Kenai Peninsula. It is the only such valley, as glaciers and high mountains separate the two ecosystems. Wolves, brown bears, moose and unique plant life use the corridor to enrich biodiversity on both the Kenai Peninsula and PWS. The Nellie Juan River is proposed for Wild and Scenic status, citing its long free-flowing condition and the presence of all five species of Pacific salmon. Along with the nearby Paradise and Snow River drainages, the area is full of spectacular scenery, recreation cabins, and outstanding opportunities for subsistence, solitude, hiking, camping, and more. It is wild Alaska only a few hours from Anchorage and even closer to Seward.

Again, all of the above five areas should be returned to the Wilderness recommendation.

2. Management of WSA as Wilderness Until Designated by Congress -- Until Congress designates the WSA as Wilderness, the entire area must be managed as Wilderness, as it had been after ANILCA, but not in recent years. In fact, Forest Service negligence has resulted in the degradation of the Wilderness characteristics of many areas in the WSA. The Proposed Plan Revision takes this negligence even further and terminates the former Wilderness management mandate across the entire WSA, and allows additional damaging activities to be permitted in the area.

In 1980, the Forest Service promised to protect western Prince William Sound until Congress designates the areas as Wilderness. But after EVOS and the Whittier tunnel road opening, the Forest Service strayed from the Wilderness mission and now proposes to further reduce Wilderness protections. Even as it acknowledges the challenges facing the area, the Forest Plan Revision proposes to allow continued expansion of motorized uses (disguised as traditional access), small-scale timber harvests by residents, and other damaging activities.

Although the Alaska Region Forest Service standard has been to manage all WSAs in their entirety as Wilderness, the new plan envisions dropping this mandate, reverting to an ANILCA standard, thus no longer managing the WSA as Wilderness. This would be disastrous for western PWS Wilderness values.

The proposed Plan appears to downgrade overall management protection for the entire WSA. The 2002 Plan says:

Manage WSA and recommended wilderness consistent with the provision of the Wilderness Act and ANILCA, pending congressional action (Goal for WSA, p. 3-11), and;

Forest Service regional manual direction controls the management direction of the Wilderness Study Area until

Congress considers the Wilderness Study (WSA Management Area, Theme p.4-12)

Regional manual direction describes managing the area consistent with the Wilderness Act and ANILCA Wilderness areas, guided by the principal of non- degradation of Wilderness character.

But this direction is replaced in the Proposed Forest Plan Revision with:

Management of the WSA will follow the direction provided by ANILCA to the extent consistent with law until Congress determines otherwise. (p. 44 of proposed Plan)

The problem is that ANILCA provides no management direction for the WSA, except ordering the Wilderness Study (ANILCA Sec. 704) and certain references in ANILCA 1315b (aquaculture) and ANILCA 1110 (access).

In other words, the policy is weakened and made even more vague. This exacerbates the problem cited on page 11 of the Proposed Forest Plan Revision, which describes "confusion" as a management challenge for the WSA. It fails to respond to the challenges of increased visitation and motorized uses described earlier in the Proposed Plan (p. 11, 14) and the Assessment (Chapter 3, pages 160, 161, 175).

The proposed Plan also opens the WSA to various activities currently not allowed (soil/watershed/wildlife projects and personal use timber harvest-compare proposed Plan p. 42 to 2002 Plan, 4-13, 4-17), and it relaxes restrictions on other activities (fish habitat projects, compare proposed Plan p. 42 to 2002 Plan, 4-13, 4- 17). This enables the State, researchers, and other private and public entities to manipulate and experiment with natural processes in western Prince William Sound, and to alter vegetation, watercourses, and habitats. As stated, it also allows individuals to perform small-scale timber operations.

Allowing such manipulation contravenes the Plan's stated purpose of preserving Wilderness character.

Additionally, the allowed activities will likely bring motorized equipment and permanent structures to western PWS. Already, USFS has altered western PWS with weirs, fish ladders, impoundments, five of the largest fish hatcheries in the world, and a large communication site. The opening of the Whittier tunnel road has brought a huge increase in motorized traffic on the marine waters adjacent to the WSA.

The proposed Plan weakens WSA protections and fosters confusion by omitting any direction on motorized uses and mechanical transport in the WSA. Even as the proposed Plan recognizes that motorized uses compromise the WSA's Wilderness character (proposed Plan, p. 11, 14; Assessment, p. 160-1), it appears to eliminate any restrictions or guidelines on motorized uses. If maintaining the area's Wilderness character is a goal, which it clearly should be, then the Plan should outline restrictions and limitations to motorized uses and mechanical transport that are consistent with ANILCA and Alaska Region Wilderness management policy for the WSA. In contrast to the Proposed Forest Plan Revision, the 2002 Plan and Alaska Region policy contain specific prohibitions or guidelines for motorized uses including helicopters, snow machines, airplanes, generators, chainsaws, and more.

The Forest Service Should Manage the WSA to Only Allow Snowmachine Use for Activities that are truly "Traditional" under § 1110(a) of ANILCA.

The WSA should be protected from an overly broad interpretation of what qualifies as a traditional use under ANILCA. The Forest Service's definition of "traditional" allows the exception to swallow the rule and will cause the degradation of the wilderness resource by activities that are not those sought to be protected by ANILCA § 1110(a).

ANILCA provides guidance on Wilderness management that reflects the unique conditions in Alaska and the unique relationships that Alaskans have with the land based on gathering resources from the land. The traditional activities that Alaskans engage in are not locked in the past, but represent a fluid and meaningful relationship with the land. The Agency has an obligation to allow traditional activities but must be careful to avoid an inappropriate expansion of the definition of traditional activities, particularly when new technologies - in some instances - may impact the wilderness character of the WSA. Western Prince William Sound offers unique opportunities for a wilderness experience in close proximity to Anchorage and there are extensive opportunities for mechanized, non-wilderness-dependent activities on other lands in and around the Chugach.

The Forest Service interpretation of ANILCA Sec 1110 'traditional activities' is too broad when it includes recreational snow machine use. While sightseeing and primitive recreation are appropriate uses of Wilderness, 36 CFR 13.950 rejects recreation and sightseeing as traditional activities. In

addition, Sec 1110(a) of ANILCA states that the use of snow machines for traditional activities "shall be subject to reasonable regulations...to protect the natural and other values..." This language clearly gives discretion to the Forest Service to ensure that the wilderness character remains intact. Nothing in ANILCA implies "traditional activities" include recreational use. The Park Service defines "traditional" as an activity that occurred when ANILCA was enacted and that involves the consumptive use of one or more natural resources of Old Denali Park, such as hunting, trapping, fishing, or berry picking. We encourage the Forest Service to utilize this same definition. There are few places left for those who are seeking to enjoy pursuing traditional activities and recreation without non-mechanized transport. The Chugach is a land of many uses, and we hope the Forest Service will support the abilities of Alaskans and visitors to enjoy the wilderness experience.

While we recognize the importance of ANILCA's direction on permitting certain motorized uses for traditional activities, motorized use in Western Prince William Sound can be detrimental to the WSA's wilderness character if allowed improperly (proposed Plan, p. 11, 14; Assessment, p. 160-1). The Plan appears to do away with guidelines or reasonable checks on motorized uses. The Plan should outline restrictions and limitations to motorized uses and mechanical transport that are consistent with ANILCA and Alaska Region policy for the WSA to maintain the wilderness characteristics of the WSA.

While there are many areas on the Chugach where recreational snow machine use is appropriate, this use is not an activity that is compatible with management that aims to protect wilderness character. In contrast, snow machine use for traditional activities such as hunting can be managed in a way that does not detract from wilderness values. We are confident that the Forest Service can craft reasonable regulations that allow snow machine use for traditional and subsistence activities while also protecting wilderness character.

Conclusion:

We compliment the Supervisor's office and team for the extraordinary amount of work and detail that this complex and outstanding region presents in presenting a plan that will conserve the integrity of the region and allow for the enjoyment and sustainability of the communities and people in balance with the nature of the region.

Given this cumulative context, the Forest Plan Revision must emphasize ecological sustainability, or multiple, non-consumptive, sustainable use, as the overarching management goal for the region. This emphasis will also ensure the long-term economic sustainability of the region, as economics in the Chugach National Forest are derived largely from its scenery, fish and wildlife, recreation, and wilderness values.

With definitive, clear direction and language, the Plan Revision must emphasize these non-consumptive, sustainable uses of the region as its main goal. We urge you to clarify, strengthen and expand this Revision Plan so it can stand as an outstanding document of protection of one of the most important ecological regions in America.

Thank you for your consideration of our comments.

Carol Hoover  
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