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Comments: Thank you for giving me the opportunity to comment on the current draft plan revision for the Chugach National Forest. This is NOT the first time I am commenting on Chugach planning, as I did so during earlier comment periods, during 2000 and again for the (current) 2002 Plan, I remember being in Cordova in summer of 2000 and personally hand delivering a comment letter to the Forest Service office.

Although I live in California I have visited Alaska approximately once a year since 1987. A number of those visits have been to the Prince William Sound area. In 1989, post-Exxon Valdez oil spill disaster, I was on a small boat spending several days inspecting beaches from Cordova to Whittier, including Knight Island, where we anchored over one night. In 1993, I spent four days in a Forest Service cabin on Montague Island. In 2000, I rafted the Copper River, from Chitina to Cordova. In 2001, I spent four or five days on a kayak trip out of Whittier, going through Culross Passage to Port Nellie Juan, and which included a full-day hike in the hills above Port Nellie Juan, then returning to Whittier via Perry Passage, etc. In 2006 I rafted the Bering River, putting in at Lake Kushtaka and taking out past Chilkat. In 2013 I participated in a seven-day kayak service trip to Knight Island, working with Forest Service wilderness rangers, and spending the majority of our time in the Herring Bay area.

Since I first commented in 2000 and 2002, and the current forest plan came out, there have been significant changes in the Prince William Sound (PWS) area-especially such as the 1989 Exxon-Valdez oil spill disaster that placed unimaginable stresses on the natural ecosystem and the opening of the new automobile tunnel to Whittier that gave immediate faster and easier access to Prince William Sound to more than half the population of Alaska; and of course climate change is proceeding, has proceeded relentlessly.

As far as I can see, ALL the changes since 2002 have put additional pressure on the natural resources of this magnificent natural area and thus impose a need for MORE protective management to guard the integrity of the Congressionally-mandated Wilderness Study Area, (WSA) in which the wilderness character must be kept rigidly inviolate (until such time as Congress makes up its mind about how this area should be managed - and Congress does not seem about to make up its mind any time soon.).

Therefore I am deeply troubled, and dismayed, to see that the new draft plan revision actually relaxes, eases, and diminishes management standards and no longer makes Wilderness-Act and ANILCA-based standards the requirements for managing the WSA. The draft plan degrades the proposed wilderness area in western Prince William Sound (PWS); leaves most of the Chugach open to mineral development; fails to protect many of the wilderness and sustainable values of the region; and surprisingly ignores the powerful goals of the Exxon Valdez Oil Spill (EVOS) Restoration program. The current draft plan revision emphasizes certain high-impact uses (motorized recreation, mining, habitat manipulation, small-scale timber harvests, etc.) that conflict with other low-impact, sustainable uses (wilderness recreation, tourism, scenery, fish and wildlife habitat, etc.). The proposed plan revision compromises the legal requirement for balance and sustainability. Nor does the plan revision consider the ongoing risk of another major oil disaster; the final plan must assure ecosystem resilience in the face of another such potential disaster.

The proposed plan opens the WSA to various activities currently not allowed (soil/watershed/wildlife projects and personal use timber harvest), and it relaxes restrictions on certain activities such as fish habitat projects. This enables the State, researchers, and others to manipulate natural processes in western Prince William Sound, altering vegetation, watercourses, and habitats. It allows individuals to perform small-scale timber harvests. Allowing such artificial manipulation contradicts the Plan's stated purpose of preserving wilderness character. Some examples of weakened management allowing unacceptable impacts-which problems MUST be addressed and fixed in the current process leading to a final plan revision:

++Over-hunting has drastically harmed the local black bear population.

++ A misguided attempt to expand bird populations by USDA Wildlife Services resulted in the loss of an alarmingly high percentage of mink on some islands.

++ Unregulated recreational snowmobiling on hundreds of square miles of once-quiet mountains and glaciers, some in the wildest parts of the area, as permitted by the Forest Service, has caused noise, pollution, and damage to the land. This worrisome trend, harmful to wildlife and to other human visitors, is increasing. Motorized over-snow vehicles compact the snow and disturb wildlife.

++ The State of Alaska has abandoned its legal case against Exxon-Mobil, leaving more than 20,000 gallons of Exxon Valdez spilled oil remaining to continue to pollute beaches.

++ None of the area is withdrawn from large-scale mining. The Forest Plan revision even encourages mineral exploration, despite the fact that mining would be disastrous for subsistence, commercial fishing, wilderness, recreation and tourism, which form the backbone of the area's economy.

++ Personal woodcutting and forestry has been allowed to denude beaches, and the agency has let chainsaws be used to cut trees, clear campsites, cut firewood, etc. in western PWS.

++ Steady encroachment by development and motorized uses, construction of a large communication site and two industrial fish hatcheries, with roads, heavy equipment, and buildings have been allowed. Wild salmon streams are threatened as thousands of fish escape from the hatcheries each year. The draft revision fosters confusion by its vague language that omits any specific direction on motorized uses and mechanical transport within the WS.

The final plan must turn around and restore the formerly finely tuned balance of protective management for the WSA, and must manage the entire WSA as Wilderness, as had been the rule subsequent to ANILCA, but which management had gradually, little-by-little seemed to subside, slump, and droop in more recent years. The good intentions, following the law, and strict management actions based on the Wilderness Act and ANILCA requirement, strangely appeared to act like a leaking balloon that gradually lost its air and deflated. Whereas, due to changes adding pressure on the natural resources of the Sound, management standards should actually be ramped UP - and be stronger (NOT WEAKER) to assure maintenance of wilderness character.

An appropriate and necessary way to strengthen the WSA's management standards would simply be to follow the practical and common-sense, realistic stipulations of the EVOS Restoration Plan. The EVOS plan states that "Habitat protection on existing public land and water may include recommendations for changing agency management practices. The purpose, in appropriate situations, is to increase the level of protection for recovering resources and services above that provided by existing management practices. (emphasis added.) The Trustee Council may conduct studies within the spill area to determine if changes to public land and water management would help restore injured resources and services. Recommendations for special protective designations, such as parks, critical habitat areas, or recreation areas, may be made to the Alaska legislature or the U.S. Congress." Establishing additional protective measures on public lands and waters in the oil spill region to preserve and/or replace resources and resource services lost or injured in the oil spill remains a vital action to be taken by the Forest Service and included in the current plan revision.

For instance, recommending and managing western PWS as Wilderness would support the EVOS Restoration Plan goals and should be called for in the current plan revision. Injured resources and services, still listed by government Trustees as not recovered, include wilderness, recreation and tourism, subsistence, and passive use. Managing the entire 2-million acre western PWS area as Wilderness would be a low cost/high value preservation and restoration measure to replace and offset injuries from the oil spill.

Wilderness and Wild & Scenic River Recommendation

In addition to managing the western PWS as wilderness, the Forest Service, in the current plan revision, should recommend the entire western Prince William Sound as Wilderness. Only Congress can designate wilderness, but the agency can make a powerful recommendation, and the current planning process is the ideal time to do so. It is the right time to do so. The previous wilderness recommendation from 2002 is inadequate, and now is the time to increase it to include, at the minimum, the following areas:

++ Port Nellie Juan, Nellie Juan Lake, Main Lake - Lake Nellie Juan is among the most remote places in the PWS watershed. This biologically rich valley acts like a corridor that links 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.. Along with the nearby Paradise and Snow River drainages-on the Kenai, the area is full of spectacular scenery, recreation cabins, and outstanding opportunities for subsistence, solitude, hiking, camping, and more. 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

++Knight Island has arguably the highest, most outstanding wilderness character - of PWS -the agency's rationale--make Knight available to mineral extraction-totally turns its back on the obvious current economic benefit of Knight to the tourism economy. Knight Island has been valued as wilderness for decades-- it has become a poster child for wildness. The Forest Service even acknowledges the area's outstanding wilderness character in the proposed plan's Wilderness Area Inventory and Evaluation.

++Port Wells/West Port Wells, and Esther Island, within a single day's boat trip of Whittier, as well as favorites like Harrison Lagoon and Hummer Bay, offer families with little vacation time a chance for a true wilderness experience close by. This need-for nearby wilderness-will keep on increasing, as vacations may continue to shrink, and an increasingly urbanized populations needs to be able to get to the Wild. Keeping these lands under current protections benefits commercial fishing, subsistence, and a lucrative recreation and tourism industry.

++ Glacier Island was not recommended on the rationale of providing for subsistence, even though wilderness protections are the best way to preserve subsistence activities and subsistence resources into the future.

++Glacier Island , Harriman Fjord, Perry Is. are highly deserving of a wilderness recommendation.

Main Bay and the mainland near Eshamy: Main Bay is slated to lose protections. While it might make sense to remove the area right adjacent to the Main Bay Hatchery, the area proposed to lose protections is much too broad. It comprises some of PWS' best wild sockeye runs and cutthroat trout lakes and rivers and is home to black bears, which have been eliminated from many other areas in PWS. Contrary to agency claims, these many miles of idyllic shoreline and beaches are not too near the fish hatchery to be protected; they've thrived under current protections for more than three decades.

++Montague Island. I know it is not in the WSA, but without any doubt it too is highly deserving of a wilderness recommendation in the Chugach plan revision process.

++Similarly calling for a recommendation are the Paradise Lakes Valley and the upper Snow River Watershed on the Kenai Peninsula.

Wild & Scenic Rivers:

The Forest Plan Revision must expand recommendations for designation of Wild and Scenic Rivers (WSR) in PWS and Copper River/Bering River areas. In the draft plan revision only ten (10) river segments are recommended for inclusion in the National Wild and Scenic River System (NWSRS). Except for three miles of Child's Glacier recommended as a Scenic classification, there are no recommended WSR designations in PWS and Copper river/Bering River areas. Nellie Juan River is recommended for Wild designation, but is considered to be part of the Kenai.

Rivers that were analyzed as eligible, but considered by the Forest Service as "not suitable" for WSR designation include the Copper River, Bering River, Martin River, Columbia Glacier, Alaganik Slough, Coghill River, Katalla River, Martin Glacier, Rude River, and Portage Lake. The spectacular and rich habitat of the "Heads of the Bays" in eastern PWS - Bear Trap, Gravina, Fidalgo, Sheep, Simpson -is totally ignored for protective recommendation as WSR. All of these deserve, and should be recommended for, Wild and Scenic River designation.

In summary: actions the final plan should call for

Beyond the wilderness recommendations addressed above, management actions needed include:

- 1) The eastern Chugach - including the Copper River/Bering River/Martin Lake & River/Katalla Rivers and watersheds - area should be managed protectively as critical salmon and wildlife habitat and continue to allow existing use for fishers and subsistence harvesters;
- 2) 1.9 million acres of the of the original 2.1 (approx.) Wilderness Study Area (WSA) of western Prince William Sound should be recommended to Congress for designation as Wilderness; the WSA should continue to be

managed as Wilderness and remain the same size until it is congressionally designated.

3) The Forest should be withdrawn from mineral entry and forestry actions; and additional protective conservation acquisition areas should be identified;

4) The management plan revision must look at the entire ecosystem as a whole -- especially to address and prepare on a landscape scale for the impacts of climate change. Sea level rise, among other climate change impacts needs to be addressed, as well as habitat changes and other impacts.

5) The plan needs to outline restrictions and limitations to motorized uses and mechanical transport that are consistent with ANILCA and Alaska Region policy for the WSA.

6) The Forest Plan Revision should prohibit projects that alter stream flow in any way, such as ostensibly for fisheries "enhancement." PWS already has enough (probably too much) fisheries enhancement with its several large salmon hatcheries and remote releases.

Finally - the idea of Wilderness remains as vital today as it ever did and can only become more so with an increasingly urbanized population in the future. While, it is obvious that Alaska has more designated Wilderness than any other state - indeed, nearly half the wilderness of our entire nation, the vast majority of that Alaska Wilderness is very remote, and, for the majority of Alaskans, virtually inaccessible. However, Prince William Sound provides nearby, accessible wilderness within a day's or a weekend's range of where the majority of Alaskans live. It is simply not fair, not just, not right, for the Forest Service, to pull the rug out from under this needed, nearby wilderness by now longer managing the vast WSA as wilderness. Why? The only rationale I can see given is the desire to make these places available for mineral extraction. There is little if any proof of available mineral deposits that are extractible without significant deleterious impact. Mineral extraction delivers its own harsh impacts and lasting toxic remnants on an ecosystem that is already stressed. Why pile up negative upon negative when it would be so simple, so logical to use this plan revision process to restore the balance for Prince William Sound?

Protecting wilderness will provide for ecological sustainability, which should be the overarching goal for management. Emphasizing ecological sustainability will also help ensure long-term economic sustainability of the Chugach region.

Thank you for considering these comments that are based on my experience in Alaska and my concern for the future of an irreplaceable wild Alaska natural treasure..

Vicky Hoover