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First name: Pete

Last name: Denmark

Organization: Prince William Sound Stewardship Foundation

Title:

Comments: Thank you Chugach National Forest managers for the opportunity to comment on the draft Forest Plan. Thank you also for incorporating public comment from 2016 into the draft plan.

The Prince William Sounds Stewardship Foundation is dedicated to maintaining the wilderness character of western Prince William Sound. We are a community of individuals, businesses and organizations supporting public education, restoration, and stewardship projects that serve Prince William Sound's ecosystem, fish, wildlife, residents and visitors. Several of our founding members have been active in Prince William Sound for decades, as business people, educators, researchers, writers, and recreationists. In 2018, we helped restore campsites in Blackstone Bay, treat invasive species in Whittier, and remove marine debris from miles of remote Prince William Sound beaches, among other work. We accomplish this through volunteerism, fundraising, and partnership with public and private entities, including the Chugach National Forest.

We applaud the changes to the plan since the 2016 draft and for addition of an Alternative D Wilderness Recommendation to represent broad public support for continued protection of western PWS. However, we propose the following improvements to the plan, which we believe are necessary for continued responsible care for Prince William Sound.

1. We recommend the Forest Service more clearly affirm its current, 40-year commitment to maintaining the "wilderness character" of the Nellie Juan-College Fiord Wilderness Study Area (WSA). This important term describes the natural, undeveloped, and remote conditions that are vital to recreation, tourism, commercial fishing, subsistence, and the use and enjoyment of one of Alaska's finest wilderness settings. We are concerned that proposed language to only maintain the area's "existing character" is too loose and ill-defined for the demands of managing the western sound. We believe continued use of the term "wilderness character," as appears in the 2002 Forest Plan, will more effectively guide Forest Service management.

2. We urge the Forest Service to restore its program of monitoring conditions in the Wilderness Study Area to the Forest Monitoring Plan. The draft plan's omission of this program, which includes monitoring air quality, recreation impacts, visitor numbers, and other basic measures specific to the WSA, would severely undercut informed management. After personally witnessing the changes in Prince William Sound following the 1989 Exxon Valdez oil spill and the 2000 opening of the Whittier tunnel to vehicle traffic, among other changes, we know monitoring is vital to responsible management. We also believe monitoring for change can be cost-effective and that it meets the proposed Plan's criteria for the monitoring program, specifically bullets 5 and 7 on page 81. Also consider that our organization can help engage public partners and resources in monitoring, but only if the Forest Service restores its commitment to a defined monitoring program.

3. We support the goal of creating Forest Orders addressing the use of helicopters and drones in the WSA, which will protect the area's existing wild characteristics and enable future generations to enjoy the area as we do today. But we also encourage a Forest Order to resolve confusion about the legality of using chainsaws for recreational purposes in the WSA. Through our business dealings and personal experiences we know chainsaws adversely affect the scenic quality of Prince William Sound beaches every year. We support legal use of chainsaws for ANILCA purposes such as subsistence, but we urge the Forest Service to address the ongoing and unnecessary chainsaw vandalism along beaches in the western sound, which every year affects live trees and the uniquely valued "ghost trees" from the 1964 earthquake.

4. We recommend the plan more clearly acknowledge that the Exxon Valdez Oil Spill Trustee Council still lists the WSA as an injured resource. Area management should include restoring and maintaining the wilderness qualities

damaged by the spill, as described in the Exxon Valdez Oil Spill Restoration Plan. In this light, we also:

a. Urge the Forest Service to include within the Wilderness Study Area Management Area (MA1) the lands around Jackpot Bay, Paddy Bay, and Knight Island that were acquired following the oil spill. Managing these lands under the "EVOS Acquired Lands" Management Area (MA6) would weaken their protection and ignore that their original purchase was in part due to their proximity to the WSA and possible designation as federal wilderness. Under MA6, lands and waters can more easily be developed or altered than if they remain in the WSA management section. This would go against the intent of the 1997 federal purchase of these lands, aimed at restoring and maintaining their wilderness qualities.

b. Urge the Forest Service to include the lands around Jackpot Bay, Paddy Bay, and Knight Island in the wilderness recommendation that will accompany the Forest Plan. These lands were purchased with Exxon Valdez oil spill settlement funds and are legally required to be managed "in perpetuity for conservation and wilderness purposes." Recommending their designation as the type of wilderness described in ANILCA is the best way to fulfill this obligation.

5. We strongly support the proposed adoption of a Wilderness Study Area stewardship plan. It should be integral to the area's upkeep and include goals for invasive species treatment, campsite restoration, protection of sensitive sites, and other on-the-ground measures. Our organization already works toward such goals, in partnership with the Chugach National Forest and others. Having a stewardship plan in place would increase our effectiveness and ability to leverage funding, new partnerships, and public support for its goals.

6. We support the Alternative D ROS and Alternative D Wilderness Recommendations, but with the addition to wilderness of the Nellie Juan Lake area, arguably the most pristine and remote part of the WSA, and the EVOS-acquired lands around Jackpot Bay, Paddy Bay, and on Knight Island. We believe this alternative best supports the fish, wildlife, ecology, and human interests in Prince William Sound.

We believe our proposed improvements to the Chugach Forest Plan are necessary to sustain current protections through the years ahead, benefiting both the ecosystem and the people of Prince William Sound.

Thank you again for the opportunity to comment.

Signed on behalf of the Prince William Sound Stewardship Foundation:

Kelly Bender, Lazy Otter Charters; Whittier, AK

Pete Denmark, Alaska Sea Kayakers; Whittier, AK

Marybeth Holleman; Anchorage, Alaska

Paul Twardock; Anchorage, Alaska