

Data Submitted (UTC 11): 10/31/2018 8:21:26 PM

First name: Vicky

Last name: Hoover

Organization:

Title:

Comments: Thank you, Chugach NF, for providing an opportunity to comment on your draft management plan during the current revision. Since the Prince William Sound (PWS) area of the Chugach NF is the area I know the best, and have personally visited the most-my comments refer mainly to that main area-in particular the western PWS, that is mostly within the Nellie Juan-College Fjord Wilderness Study Area (WSA).

Thank you for strengthening some aspects of Nellie Juan-College Fjord WSA management in response to 2016 comments. Specifically-thanks for:

- Calling for an "interdisciplinary wilderness stewardship plan" for MA-1 under Objectives and management Approaches-although the description (PLAN, p. 50) incorrectly refers to "existing character" rather than "wilderness character"-see discussion below-under "Management Concerns: Wilderness Character."
- Including good language on managing snowmachines in the WSA, consistent with ANILCA;
- Under desired conditions, mandating prevention and early detection of invasive species-which negatively affect wilderness character.
- Improving direction for Minimum Requirements Analysis (MRA) which distinctly refers to wilderness management; however, some further improvement is needed to assure ALL proposed actions that could potentially adversely impact the area's wilderness character undergo MRA-including in the EVOS acquired lands,

Please continue the good work by making the following improvements to the proposed Forest Plan: (My comments are divided into two sections-first, management concerns; second-wilderness recommendations:

#### MANAGEMENT CONCERNS:

**WILDERNESS CHARACTER:** Previous documents, including the current 2002 management plan, and longstanding clear policy for at least a quarter century (or more) have emphasized the need to maintain "Wilderness character". Suddenly and without precedent or rationale, your proposed plan refers only to the less specific and weaker "existing character". That is an unacceptable weakening of longstanding policy and direction. Please restore the concept of protecting the wilderness character of the WSA "Existing character" alone is not meaningful. It is undefined - and possibly undefinable; any conditions that exist, including inappropriate damaging impacts, become its "presently existing character". It is the area's "Wilderness character" that must be preserved. Wilderness character has a very clear and specific meaning for agency management-as long agreed upon by all four federal land management agencies, with reference to an area's natural, undeveloped and untrammeled qualities, plus opportunities for solitude OR primitive recreation. Protecting the area's wilderness character is vital to maintaining healthy ecosystems and remote, undeveloped conditions in western Prince William Sound.

**MONITORING:** Restore the WSA to the Forest Monitoring Program described in Appendix A. Monitoring wilderness character in the WSA is necessary to inform the Forest Service about effective management and continued recovery of wilderness resources damaged during the 1989 Exxon Valdez oil spill (EVOS). Without dependable monitoring, it is not possible to know if the wilderness character is being maintained.

**EVOS-ACQUIRED LANDS** Restore the direction for strong protective management to the lands within the WSA that were purchased by the federal government following the 1989 Exxon Valdez oil spill. The purpose of these acquisitions was for restoration of wilderness resources. The Exxon Valdez Oil Spill Trustee Council specifically named the wilderness attributes of the WSA as an injured resource. In 2014, EVOSTC, of which the Chugach NF is a member, confirmed that the area's wilderness attributes remain a recovering injured resource. KEEP these EVOS-acquired lands in the WSA Management prescription (MA1). Do NOT move these lands to the weaker "EVOS-acquired Lands" (MA6) prescription The Forest Plan needs to give specific and clear direction that these

lands must be managed "in perpetuity for conservation and wilderness purposes," as promised in the legally-binding purchase agreement when they were acquired after the Exxon oil spill.

**CHAINSAWS IN WSA?** Use of chainsaws for personal use timber harvest or other private recreational purposes is not permissible by law in the WSA. Chainsaw use, other than for certain administrative purposes, every year results in senseless damage to picturesque beaches through the removal of live trees and historic "ghost trees". The Chugach Final Plan must address ongoing recreational use of chainsaws.

**ALTERNATIVE D ROS MAP** The Chugach plan should adopt this map-- which appropriately describes all WSA lands as covered by the Primitive standard.

**STANDARDS AND GUIDELINES:** Continue to fine-tune WSA standards and guidelines so the language there clearly and carefully protects the specific qualities of wilderness character-as mentioned above.

#### **WILDERNESS RECOMMENDATIONS:**

I write in support of a modified Alternative D wilderness recommendation that also includes Lake Nellie Juan and the lands within the WSA boundary that were purchased for restoration of wilderness resources following the 1989 Exxon Valdez oil spill (EVOS). Not including the EVOS lands in the wilderness recommendation contradicts the commitment to manage them "in perpetuity for conservation and wilderness purposes."

I support all the wilderness recommendations in Alternative D, which total 1,884,200 acres-nearly 97 percent of the WSA's area. This is a definite and gratifying improvement over the inadequate 2002 wilderness recommendation and over current direction. It reflects public comments in recent opportunities for both written comment and spoken comment in public meetings earlier in the Chugach Plan revision process. I agree with excluding from wilderness recommendation the lands around Blackstone Bay; they are appropriate for higher-amenity-based developed camping experiences-which could even reduce visitor-use pressure on some of the more distant lands, like on Knight Island. But Alt. D should be modified to INCLUDE in the WSA wilderness recommendation lands acquired by the Forest during the Exxon-Valdez Oil Spill Restoration Plan (EVOS).

--- If some of these lands were excluded from the proposed draft plan because the Forest does not own subsurface lands here, this is no excuse to exclude these valuable lands from protection - on the other hand -- it is a reason the agency should make every effort to acquire this sub-surface estate. (This mainly applies to parts of Knight Island and for Jackpot and Paddy Bays--about 60,000 acres of mostly productive wildlife habitat on the mainland near Port Nellie Juan.

--- If some of the WSA lands are excluded because of use challenges, such as increased boat traffic since the opening of the Whittier Tunnel to private automobiles, and anticipated new uses such as drones, helicopter flights, commercial filming efforts, or other, these challenges should actually lead to stricter protection to guard against unsustainable uses and future degradation of wilderness suitability.

--- If some areas are not recommended by the proposed plan in order to keep them open to future mining, this seems a very short-sighted strategy for many reasons, both ecologically and socio-economically. Even if you look only at monetary values (which are far from the only ones that need to be considered) the current, or amplified protections for the area's wilderness values best assure sustainability of current economic benefits from dispersed/wilderness recreation, other tourism for magnificent scenery and wildlife, commercial fishing industry, and (far from least) subsistence resources..

--- For the Chugach Plan NOT to recommend the amount of wilderness in Alternative D would be a change backwards in ongoing and long-term management strategy that residents and business in the area have depended on and become accustomed to for more than a quarter century and built into their expectations and business plans. Such a step backwards could negatively impact considerable tourism and wild-country based land and marine recreation, plus subsistence use and fundamental appeal of the area to visitors.

#### **WILDERNESS RECOMMENDATION FOR NON-WSA PWS LANDS:**

I urge a wilderness recommendation for most to all of the Montague Island Inventoried Area. (DEIS, pp 543-546) The area is extremely wild. It is de facto wilderness in all but name. I have visited Montague Island and stayed in a Forest Service cabin there, and appreciate and the wilderness qualities of this vast landscape. The likely or potential presence on Montague Island of two endemic species-the Montague Island marmot and Montague Island vole is a further inducement to recommend wilderness protection for this area. If certain parts of Montague Island were omitted from a wilderness recommendation it could be the area right around Patton Bay. If presence of private lands is seen as an issue, the whole area is of sufficient size that omitting the private lands from the recommendation would be feasible. Alternatively, efforts can be made to acquire these lands.

#### WILDERNESS RECOMMENDATION FOR NON PWS LANDS;

There is considerable potential for additional wilderness recommendation from some of the areas which the Forest has excluded from further analysis. I will focus on only one of these - the huge Bering Lake Inventoried Area. (DEIS-pp557-on) It is totally incomprehensible that none of this vast, phenomenally wild landscape is being recommended for wilderness. I have rafted the Bering River from Kushtaka L. If there are conflicts with certain portions of the Inventoried Area, that portion can be omitted from a recommendation; however, the whole area is of sufficient size plus the way this area butts up against the wilderness of Wrangell-St. Elias National Park (WSE) assures that even a relatively modest percentage of the entire Bering Lake Inventoried Area being recommended will assure a significant addition to connected, protected habitat and wilderness area. Size matters - and connectivity matters. It is up to the Chugach National Forest to make it happen.

Thank you for considering these comments.

Vicky Hoover  
735 Geary St #501  
San Francisco, CA 94109