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Comments: Wilderness Watch submits the following comments on the Draft Land and Resource Management Plan for the Chugach National Forest. Our organization is particularly interested in how the Plan deals with the 1.9 million-acre Nellie Juan-College Fjord Wilderness Study Area (WSA).

While improvements have been made since the last comment period two and a half years ago, the plan still must be strengthened to protect the WSA as Congress intended when designating it with the 1980 Alaska National Interest Lands Conservation Act (ANILCA). To that end, we request the following:

- \* The Plan must protect the "wilderness character" of the WSA, not just the Draft Plan's weaker proposal to protect just its "existing character."
- \* The Plan must also protect the wilderness character of the lands in the WSA by classifying all of them with the Forest Service's "Primitive" standard in the Recreational Opportunity Spectrum. This is the most protective standard in the agency's recreational classification system.
- \* Restore strong protection to the lands within the WSA that the federal government purchased following the 1989 Exxon Valdez oil spill (EVOS). These lands were acquired for the restoration of wilderness values and must be managed "in perpetuity for conservation and wilderness purposes," as promised when they were purchased.
- \* The Chugach NF must address ongoing illegal recreational use of chainsaws in the WSA, which has resulted in damaging tree removal along dozens of wilderness beaches, including in sensitive areas.
- \* Alternative D recommends the maximum amount of land for Wilderness of any of the Alternatives (97 percent of the WSA, or 1.884 million acres). We support 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 oil spill.
- \* Please recommend the maximum amount of land for wilderness designation, and protect the WSA until Congress acts to designate the WSA as Wilderness.