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Organization: Arctic Audubon

Title: Conservation Committee

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Dear Forest Service,

Arctic Audubon provides these comments on the draft Chugach National Forest Management Plan and its proposed Nellie Juan-College Fiord Wilderness Study Area (hereafter, Nellie Juan WSA). We recommend a modified Alternative D which also includes Lake Nellie Juan and the lands that are within the external Wilderness Study Area boundary.

Arctic Audubon is the most northern Chapter of the National Audubon Society. Our area covers Alaska north of the Alaska Mountain Range to the Beaufort Sea. Our chapter has about 200 members, and although many of us live in Fairbanks, we are represented throughout our area. We are all volunteers, so our chapter speaks with our own voices, as do all Audubon chapters. Many of our members use and know well Prince William Sound and the Nellie Juan WSA area, for birdwatching, scientific studies, hunting and fishing, recreation, and wilderness experiences.

Even though Nellie Juan WSA is hundreds of miles away, it is still part of big backyard. Migratory birds also connect us here in Fairbanks and Interior Alaska to this unique area. Many of us personally witnessed the devastation of the Exxon Valdez oil spill. The spill hit just as the coast and Prince William Sound stirred with spring life and bird migration; over 30,000 carcasses of 90 species of birds were found and scientists estimated as many as half a million migratory birds died. The spill killed an estimated 250,000 seabirds, 250 bald eagles, 2,800 sea otters, 300 harbor seals, up to 22 killer whales and billions of salmon and herring eggs, according to the Exxon Valdez Trustee Council. (<http://www.evostc.state.ak.us/index.cfm?FA=facts.QA>)

Decades later, some migratory bird species which still have not yet recovered include Marbled Murrelets and Pigeon Guillemots; designated Wilderness Areas are among the many natural resources which are still recovering (<http://www.evostc.state.ak.us/index.cfm?FA=status.injured>).

The Nellie Juan WSA includes Important Bird Areas designated by the National Audubon Society. The marine waters of Prince William Sound IBA-including lands within the Nellie Juan WSA- is important for Kittlitz's murrelet, Pelagic Cormorant, Black Scoter, Harlequin Duck, Marbled Murrelet, and Barrow's Goldeneye. (<https://www.audubon.org/important-bird-areas/prince-william-sound>). All these species were harmed by the Exxon Valdez spill and the two murrelet species and Black Scoter are on Audubon Alaska's 2017 Red List of Declining Bird Populations. ([http://ak.audubon.org/sites/g/files/amh551/f/static\\_pages/attachments/2017\\_watchlist\\_final\\_panels\\_highres.pdf](http://ak.audubon.org/sites/g/files/amh551/f/static_pages/attachments/2017_watchlist_final_panels_highres.pdf)).

The Northern Montague Island IBA, in the Northern Pacific Rainforests bird conservation region, has coasts where a spring herring spawning event hosts one of the most spectacular bird migration events in Alaska, and is a stopover site for most of the world's Surf-bird and Black Turnstone populations among other migratory bird species. (<https://netapp.audubon.org/iba/Reports/2715>).

For all these reasons, we urge the Forest Service to select a modified Alternative D for the Nellie Juan WSA that adds Lake Nellie Juan and also designates all the important lands that were purchased for the restoration of wilderness resources that were damaged and injured by the Exxon Valdez oil spill in 1989. Those lands purchased by the federal government on behalf of all Americans from Exxon Valdez settlement funds should be managed in a way that respects and upholds the commitment to manage them "in perpetuity for conservation

and wilderness purposes."

Many of our members witnessed first-hand the oiled beaches and the chaos, massive vessel, aircraft, ineffective oil spill cleanup and other operations in 1989 and subsequent years in Prince William Sound and throughout the spilled region. This harmed wilderness resources and values, and constituted industrial transformation of formerly peaceful places including beaches within the boundaries of the proposed Nellie Juan Wilderness Area.

In light of this past devastation to birds and their habitats and the integrity of the interwoven ecosystem of Prince William Sound waters and surrounding forest, wetlands, and other habitats from Exxon Valdez spill, we strongly endorse the permanent commitment that Wilderness designation embraces for the Nellie Juan WSA including the lands within its border that were purchased by the federal government for restoration of wilderness resources.

Most of the WSA has been managed to protect its wilderness character and values since Congress designated the Nellie Juan-College Fiord WSA in 1980. At this juncture, having endured the tragedy of the Exxon Valdez spill, with its loss of millions of birds, sea otters, and life up and down the food chain, it is important not to backtrack on the 30 years of policy to protect the ecological wholeness and wilderness character of the Nellie Juan WSA. It is not good enough to protect only its "existing character." It is vital to protect the wilderness character for maintaining healthy ecosystems and the quiet undeveloped conditions in western Prince William Sound. This is increasingly important as tourism and other development pressures increase.

It is important to restore the WSA to the Forest Monitoring Program in Appendix A, which is necessary for effective management based on science and factual information, and recovery of wilderness resources damaged during the Exxon Valdez oil spill.

The lands within the WSA purchased by the federal government following the Exxon Valdez oil spill should not be moved from the WSA Management prescription (MA1) to "EVOS-acquired lands" (MA6) which is a weaker prescription.

In conclusion, Arctic Audubon highly recommends that the Forest Service choose a modified Alt D that includes Lake Nellie Juan and the lands purchased for restoration of wilderness resources by the federal government after the Exxon Valdez spill in the Nellie Juan WSA.

Sincerely,

Pam Miller on behalf of the Conservation Committee  
Arctic Audubon