

February 18, 2016

Terri Marceron  
Forest Supervisor  
Chugach National Forest  
161 East 1st Avenue, Door 8  
Anchorage, AK 99502  
[chugachplanrevision@fs.fed.us](mailto:chugachplanrevision@fs.fed.us)

Submitted online at <https://cara.ecosystem-management.org/Public/CommentInput?project=40816>

Dear Ms. Marceron:

Please accept these comments on the Proposed Revised Land Management Plan for the Chugach National Forest (proposed Plan) on behalf of Winter Wildlands Alliance, the Alaska Quiet Rights Coalition, the Sierra Club, and the Wilderness Society.<sup>1</sup> We represent over 4,000 members and supporters in Alaska, and over 800,000 members throughout the country who value opportunities for quiet, human-powered, recreation on the Chugach National Forest.

We are pleased to see the Forest Service recognize that the Chugach is an international destination for nature-based outdoor recreation.<sup>2</sup> The Chugach National Forest contains some of the most iconic, high-quality terrain for winter recreation in the United States. It is a world renowned destination, and it is also a backyard for a passionate community of local backcountry skiers, Nordic skiers, snowshoers and other winter adventurers. Although the Chugach is vast, it is also defined by its relatively easy access in places, like Turnagain Pass, where plowed roads and winter trailheads offer conduits into the Forest.

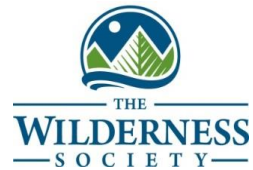
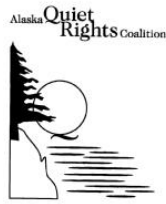
Human-powered winter recreationists seek abundant snow, terrain of varied aspects, elevations, and steepness, and a sense of remoteness and solitude, yet generally travel within a three to five mile buffer of a road during day trips. Longer overnight trips and motorized backcountry access allows a much greater range, and as such these users have nearly unlimited access to truly remote backcountry terrain across the forest. The Chugach NF has the greatest opportunity, and challenge, in managing winter recreation near its most heavily frequented winter access points. We appreciate the proactive approach to winter travel management the forest has taken in the past and while current management is working well in some areas, there are other places where change is needed. Success in the future will depend on continued prioritization of non-motorized recreation near winter access points and corridors – in essence, retaining a balance of close-to-home recreational settings with a sense of remoteness, and truly remote backcountry, where fewer restrictions are necessary. This mix is what makes the lands of the Chugach NF special.

In the revised forest plan the Chugach has an opportunity to further management actions that will support sustainable recreation opportunities, protect the wilderness-quality lands that define the forest,

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<sup>1</sup> All page references are to the pdf of the proposed plan found at [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd486944.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd486944.pdf).

<sup>2</sup> Proposed plan page 22



and set the stage for future travel planning so that recreationists of all varieties can continue to enjoy the Chugach for generations to come.

In addition to the comments provided here, which focus on recreational use and opportunities, our organizations fully support the comments, which we have signed on to, submitted by the Alaska Wilderness League.

### **1. Section 1110(a) of ANILCA Should Not Be Interpreted To Include Recreational Snow Machine Use As “Traditional”**

Our organizations sent a letter to the Chugach National Forest in November 2015 detailing our concerns with how the Forest Service interprets “traditional use” under § 1110(a) of ANILCA. We want to re-emphasize those concerns here.

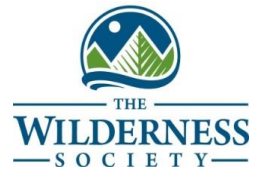
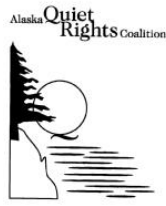
Under current forest direction motorized use is only allowed within WSAs for “traditional activities”. But this direction, and the Region 10 Forest Service manual, include recreational use in the definition of traditional activities. Since 2002, and before, the Forest Service has turned a blind eye to snowmachine use within the Nellie-Juan-College Fiord WSA and other wilderness-quality lands, conveniently hiding behind the claim that recreational snowmachine use is a traditional activity. This is despite the fact that there was essentially no historic snowmachine use in these areas. And while the Forest Service recognizes that traditional use must be confined to areas actually traditionally used, it does not require any demonstration or documentation of such use. These combined loopholes are, quite literally, large enough to drive a snowmachine through. This policy, combined with the significant advances in snowmachine technology, the growth of affluence and population in the communities connected to the Chugach NF, and a rise in boat-accessed snowmachining on islands within the Prince William Sound, has resulted in the opening up of thousands of acres to snowmachine use.

The Forest Service interpretation of ANILCA §1110 ‘traditional activities’ is too broad when it includes recreational snowmachine use. While sightseeing and primitive recreation are appropriate uses of Wilderness, the Park Service at 36 CFR 13.950 rejects recreation and sightseeing as traditional activities. In addition, Sec 1110(a) of ANILCA states that use of snowmachines for traditional activities “shall be subject to reasonable regulations...to protect the natural and other values...” This language clearly gives discretion to the Forest Service to prohibit snow- machine use within WSAs. Nothing in ANILCA implies “traditional activities” include recreational use. The Park Service defines “traditional” as an activity that occurred when ANILCA was enacted and that involves the consumptive use of one or more natural resources of Old Denali Park, such as hunting, trapping, fishing, or berry picking. We encourage the Forest Service to utilize this same definition. There are few places left for those who are seeking to enjoy pursuing traditional activities and recreation without non-motorized transport. The Chugach is a land of many uses, and we hope the Forest Service will support the abilities of Alaskans and visitors to enjoy the wilderness experience.

While we recognize the importance of ANILCA’s direction on permitting certain motorized uses for traditional activities, motorized use in Western Prince William Sound can be detrimental to the WSA’s wilderness character if allowed improperly.<sup>3</sup> The Plan appears to do away with guidelines or reasonable

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<sup>3</sup> Proposed Plan, p. 11, 14; Assessment, p. 160-1



checks on motorized uses. The Plan should outline restrictions and limitations to motorized uses and mechanical transport that are consistent with ANILCA and Alaska Region policy for the WSA to maintain the wilderness characteristics of the WSA.

There are many areas on the Chugach where recreational snow- machine use is appropriate but this use is not an activity that is compatible with management that aims to protect wilderness character. In contrast, snowmachine use for traditional activities such as hunting can be managed in a way that does not detract from wilderness values. We are confident that the Forest Service can craft reasonable regulations that allow snowmachine use for traditional and subsistence activities while also protecting wilderness character. For example, if the Forest Service were to more narrowly define traditional activities to exclude recreational use then snowmachine use within the WSA and future recommended wilderness areas would be limited to subsistence activities, travel to and from homesites, and other uses that have a long and important place in Alaskan land use.

## **2. The Proposed Plan Should Set the Stage for Future Travel Planning and Protect Opportunities for Non-Motorized Recreation**

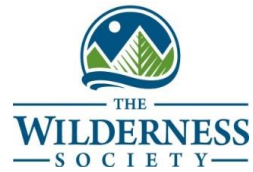
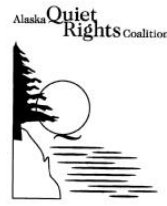
It is our understanding that the Forest Service will be updating its Winter Travel Management Plan ("Winter Travel Plan") following the completion of the forest plan revision. We support this decision and believe it makes sense to craft the overall forest management plan before diving into travel planning. However, the Forest Service should take steps to help set the stage for travel planning. The most important of these is determining the Recreation Opportunity Spectrum (ROS) classification for each area of the Chugach.

### **a. The Plan Should Include a Winter ROS Classification System**

ROS classifications are not an adequate substitute for over-snow vehicle (OSV) area designations made during travel planning, but do serve as a guide for future OSV area designations. The current ROS system is best suited for managing summertime motorized uses, as many areas traditionally classified as semi-primitive motorized or roaded natural can provide high-quality and popular opportunities for non-motorized recreation in the wintertime. For example, many visitors enjoy the opportunity to ski in front-country areas of the Chugach without having to contend with OSV use. Other visitors may not mind sharing a trail or area with OSV users. ROS classifications provide a good tool for visitors to determine where to go to achieve their desired experience. However, the expectations, experiences, and desires of visitors to the Chugach differ dramatically between winter and summertime, and ROS classifications should account for this difference.

We recommend that the Chugach National Forest develop a winter-specific set of ROS settings and include these in the Plan. One example of how another forest has approached this is to look towards the Deschutes National Forest, which developed a winter-specific set of ROS settings for its 2009 *Deschutes National Forest Winter Recreation Suitability Analysis*. Those settings are as follows:

Alpine solitude (ROS: primitive and semi-primitive non-motorized): Visitors prefer opportunities for challenge and self-reliance in a wilderness setting. Untracked snow and no facilities or services are highly desirable.



Backcountry (ROS: semi-primitive non-motorized and semi-primitive motorized): Visitors prefer opportunities for challenge and self-reliance in a backcountry setting. Untracked snow and marked but not groomed trails are highly desirable.

Alpine Challenge (ROS: semi-primitive non-motorized and semi-primitive motorized): Visitors prefer opportunities for challenge and low to moderate social interaction in an alpine setting. Good access via marked trails and a variety of terrain features are highly desirable for motorized and non-motorized users.

Motorized Social (ROS: roaded natural and roaded modified): Visitors prefer safe and family-friendly opportunities on motorized trails. Well-marked and maintained trails and adequate parking and staging facilities are highly desirable. Non-motorized visitors expect to see and hear over-snow vehicles.

Non-motorized Social (ROS: roaded natural and roaded modified): Visitors prefer safe and family-friendly opportunities on non-motorized trails. Well-marked and maintained trails and adequate parking and staging facilities are highly desirable.

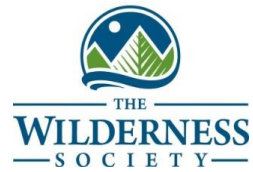
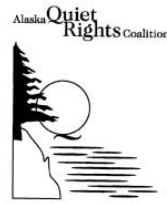
Given that the Chugach presents different management opportunities and challenges than are encountered on forests in the lower 48, a winter ROS system for the Chugach would likely be different than what the Deschutes came up with. Our suggested winter ROS categories for the Chugach are as follows:

Alpine solitude (ROS: primitive and semi-primitive non-motorized): Visitors prefer opportunities for challenge and self-reliance in a wilderness setting. Untracked snow and no facilities or services are highly desirable. In appropriate areas where motorized use has not historically occurred for traditional activities, over-snow vehicle use is prohibited.

Backcountry (ROS: semi-primitive non-motorized and semi-primitive motorized): Visitors prefer opportunities for challenge and self-reliance in a backcountry setting. Untracked snow and marked but not groomed trails are highly desirable. Motorized and non-motorized areas are separated by topographical features to limit noise impacts to non-motorized users.

Alpine Challenge (ROS: semi-primitive non-motorized and semi-primitive motorized): Visitors prefer opportunities for challenge and low to moderate social interaction in an alpine setting. A variety of terrain features are highly desirable for motorized and non-motorized users. Non-motorized alpine challenge areas are located adjacent to road access points and extend 5-10 miles into the backcountry. Motorized and non-motorized areas are separated by topographical features to limit noise impacts to non-motorized users.

Motorized Social (ROS: roaded natural and rural): Visitors prefer safe and family-friendly opportunities on motorized trails. Well-marked and maintained trails and adequate parking and staging facilities are highly desirable. Non-motorized visitors expect to see and hear over-snow vehicles.



**Non-motorized Social** (ROS: roaded natural and rural): Visitors prefer safe and family-friendly opportunities on non-motorized trails. Well-marked and maintained trails and adequate parking and staging facilities are highly desirable.

Even with a winter-specific ROS classification system the Chugach will need to re-evaluate its winter travel plan following the completion of the revised Forest Plan as OSV area designations and ROS categories are distinct, albeit related, management tools. While semi-primitive motorized and roaded natural ROS classifications provide a good starting point for where to designate OSV areas and trails, the Forest Service should not assume that OSV use is appropriate across the entirety areas with these classifications.

It is our hope that winter travel planning will occur shortly after the forest plan revision is complete. During travel planning, the agency will need to designate discrete, specifically delineated areas *within* the motorized ROS classifications and areas suitable for winter motorized uses that are located to minimize environmental damage and conflicts with other recreational uses. A winter ROS classification system will help to set the stage for future travel planning.

**b. The Plan Should Include Additional Plan Components to Protect Non-Motorized Winter Recreational Opportunities.**

The Chugach should develop forest plan components to meet the requirements of the 2012 planning rule and to provide a good foundation for any future winter travel planning. We support the recreation-related plan components that are included in the Plan but they are not enough. The Forest Service should revise the Plan to include the following:

*Desired Conditions*

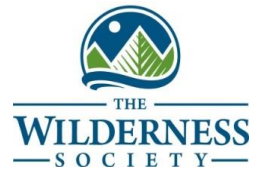
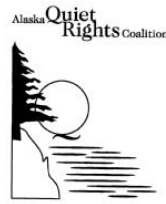
- The Chugach provides a range of sustainable and quality recreation opportunities, settings, and experiences throughout all seasons for motorized and non-motorized uses.
- "Winter non-motorized areas provide a variety of non-motorized recreation opportunities in a quiet, natural setting (including groomed and un-groomed snow)."<sup>4</sup>
- "Solitude and non-motorized experiences are available in remote settings. Non-motorized areas are of sufficient size and configuration to minimize disturbance from other uses. Non-motorized use is also available in more developed areas, but provides less opportunity for solitude and challenge than in the more remote settings."<sup>5</sup>
- "A variety of motorized and non-motorized winter and summer recreation opportunities are available. Well-designed and maintained trailheads exist and offer adequate parking and turnaround areas. Trails are designed and maintained for the given users."<sup>6</sup>
- "Winter recreation access is provided via plowed roads managed as roaded natural ROS settings. Trailhead parking areas are developed at key concentration points in order to accommodate the loading and unloading of equipment and people. Safety, regulatory, and orientation information is provided at these locations."<sup>7</sup>

<sup>4</sup> San Juan Revised Forest Plan, p. 118, 2.14.34 (2013), available at [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5435200.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5435200.pdf).

<sup>5</sup> Idaho-Panhandle Revised Forest Plan, ch. 2, FW-DC-AR-05 (2015), available at [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprd3826554.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3826554.pdf).

<sup>6</sup> Idaho-Panhandle Revised Forest Plan, ch. 2, FW-DC-AR-05.

<sup>7</sup> San Juan Revised Forest Plan, p. 118, 2.14.32.



- Natural soundscapes are preserved and enhanced.
- Motorized over-snow travel is managed to minimize adverse impacts to resources and conflicts with other recreational uses.<sup>8</sup>
- Motorized over-snow travel only occurs when snow levels are adequate to protect the ground surface from disturbance.
- Seasonal timing and other restrictions for motorized over-snow travel are employed in wildlife habitat and other sensitive areas.
- Protected and sensitive areas are closed to motorized over-snow travel.

### Goals and Objectives

- Enhance particular non-motorized winter recreation experiences or opportunities.<sup>9</sup>
- “Provide a guide to clearly inform winter recreationists of their opportunities and responsibilities to recreate in a manner that minimizes resource damage and user conflicts.” This language is in the 2002 Chugach Forest Plan and we recommend carrying it forward into the revised plan.<sup>10</sup>

### Standards and Guidelines

- “Over-snow vehicle use shall only occur on depths of snow 18 inches or greater and avoid ground disturbance.”<sup>11</sup>
- Over-snow vehicle use shall only occur during an established winter motorized season, based on average and anticipated snowpack data and other seasonal resource issues.
- This language is in the 2002 Chugach Forest Plan and we recommend carrying it forward into the revised plan.<sup>12</sup>
- Over-snow vehicle use shall not be allowed in recommended wilderness.<sup>13</sup>
- “Management activities should ensure that levels of use and development are consistent with the Recreation Opportunity Spectrum Class characteristics and recreation activity intensity levels by prescription.” This language is in the 2002 Chugach Forest Plan and we recommend carrying it forward into the revised plan.<sup>14</sup>

<sup>8</sup> E.g., San Juan Revised Forest Plan, p. 118, 2.14.36-38.

<sup>9</sup> E.g., Beaverhead-Deerlodge Forest Plan, ch. 3, p. 31 (2009), *available at* [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5432914.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5432914.pdf) (“Increase opportunities for non-motorized winter activities, such as ski touring and snowshoeing, where highway access points and parking are available.”); White Mountain National Forest Revised Forest Plan, p. 1-14 (2005), *available at* [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5199903.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5199903.pdf) (“The Forest Service will provide a range of dispersed recreation experiences that most visitors will perceive as rustic, wild, and undeveloped. Inconsistencies with ROS objectives will be minimized. Management actions will emphasize protecting unmodified, undeveloped areas and maintaining a low development level at backcountry facilities in order to ensure the continued opportunity for this experience. Personal responsibility, risk, and challenge will be recognized as an integral part of the backcountry experience.”); Chequamegon-Nicolet National Forest Plan, pp. 1-4 – 1-5 (2004), *available at* [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5117268.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5117268.pdf) (Goal: “Maintain or enhance the diversity and quality of recreation experiences within acceptable limits of change to ecosystem stability and condition.” Objective: “Improve the quality of Semi-Primitive Non-motorized Areas by increasing the opportunity for quiet and remote experiences and by promoting activities that provide natural-appearing vegetation.”).

<sup>10</sup> Chugach National Forest, Revised Land and Resource Management Plan, p. 3-8.

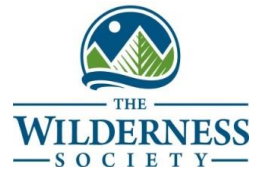
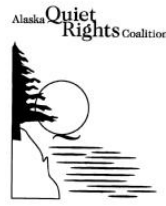
<sup>11</sup> Sierra, Sequoia, and Inyo National Forests, *Detailed Proposed Action*, p. 56.

<sup>12</sup> E.g., Chugach National Forest, Revised Land and Resource Management Plan, p. 3-35 (“The winter motorized use season is from December 1 through April 30. Because snow conditions are usually adequate in Turnagain Pass earlier, the season is from the Wednesday before Thanksgiving through April 30 in that area. The season may be extended or shortened by a Forest Order as snow conditions allow.”).

<sup>13</sup> For example, the proposed action for the Flathead National Forest plan revision does not allow OSVs within recommended wilderness.

<sup>14</sup> Chugach National Forest, Revised Land and Resource Management Plan, p. 3-35.





Thank you for considering these changes to the Plan. If you have any questions about the specifics of our concerns, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen".

Hilary Eisen  
Recreation Planning Coordinator  
Winter Wildlands Alliance  
208.629.1986  
[heisen@winterwildlands.org](mailto:heisen@winterwildlands.org)

signing for,

Brian Okonek  
President, Alaska Quiet Rights Coalition  
P.O. Box 202592  
Anchorage, AK 99516

Pam Brodie  
Chapter President, Alaska Sierra Club  
750 W 2nd Ave #100  
Anchorage, AK 99501  
[pbrodie@gci.net](mailto:pbrodie@gci.net)

Nicole Whittington-Evans  
Alaska Regional Director, The Wilderness Society  
907.272.9453 x103  
[nicolewe@twc.org](mailto:nicolewe@twc.org)