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Terri Marceron, Forest Supervisor  
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Anchorage, AK 99501

ATTN: Forest Plan Revision Team  
Mary C. Rasmussen, Team Leader

February 19, 2016

### **RE: COMMENTS ON CHUGACH NATIONAL FOREST PLAN REVISION**

Dear Supervisor Marceron and Team Leader Rasmussen,

Thank you for the opportunity to comment on the current proposed plan revisions for the Chugach National Forest. Having lived and worked in Alaska, I am directly familiar with the Chugach National Forest and have been actively engaged in commenting on its management and planning issues for some time. The following comments are based on my experience with the Alaska National Interest Lands Conservation Act (ANILCA) of 1980, the Wilderness Act of 1964, the Chugach National Forest, and national forest planning.

I have forty years of Alaska lands conservation experience, and served The Wilderness Society as Vice President (1986 to 1989), Alaska Regional Director and Senior Policy Analyst (1989 to 2004), and Consultant (2004 to 2006). I previously served as President and CEO of Defenders of Wildlife (1982 to 1986) and as Executive Officer in the Land & Natural Resources Division, USDOJ during ANILCA's passage (1979 to 1982).

Since the passage of the Alaska National Interest Lands Conservation Act (ANILCA) in 1980, there has been a fundamental flaw in the U.S. Forest Service (USFS) approach to the Chugach National Forest Plan and its proposed revisions. As surveyed by USFS Roadless Area inventory, the Chugach National Forest (Chugach) is and has remained 98% Roadless to this day and is our nation's wildest national forest. It is not a timber forest but it is a wilderness forest. Its highest and best uses are to provide undisturbed habitat for protecting and sustaining fish and wildlife populations and opportunities for wilderness based recreation such as hunting and fishing,

camping and hiking, canoeing and kayaking, skiing and snowshoeing, watching wildlife, and experiencing natural quiet for the people of Alaska and the thousands of visitors the Chugach receives annually from all over the world. The only motorized access that should be allowed on the Chugach is for traditional subsistence activities as allowed by ANILCA, not for recreation as currently interpreted by the USFS and allowed on the Chugach.

Congress established the two million acre Nellie Juan-College Fiord Wilderness Study Area (WSA) by statute in ANILCA Sec. 704 in recognition of its wilderness values to be studied and later considered for Wilderness Area designation by Congress. As a statutory WSA, the USFS has a legal duty to manage Nellie Juan-College Fiord WSA under the provisions of the Wilderness Act until Congress determines otherwise. Most if not all Roadless Areas that make up 98% of the 5.5 million acre Chugach National Forest qualify as suitable for wilderness and should be recommended for Wilderness Area designation by Congress as was expected in ANILCA.

Instead, the USFS is resisting the opportunity to protect the wildlife and wilderness values of the Chugach for their highest and best uses by trying to accommodate development, logging, mining, motorized access, and every conceivable recreation use found in the Recreation Opportunity Spectrum (ROS) while continuing to whittle away at allowing any Wilderness Areas to be designated on the Chugach with each forest plan revision. Proposing to reduce the size of the Nellie Juan-College Fiord WSA by a third and eliminate wilderness islands from consideration flies in the face of Congress's intent in ANILCA and should be rejected. The WSA is a statutory designation that the USFS cannot unilaterally change. The entire Nellie Juan-college Fiord WSA and all of the wilderness islands of Prince William Sound should be recommended for Wilderness Area designation by Congress.

While over 90% of the public wildlands from Anchorage to Denali National Park are already open to recreational snowmachines, there is no justifiable reason to accommodate such uses or any other motorized uses in the WSA and Chugach Roadless Areas. Motorized uses, including helicopters for skiing access, are incompatible with the wildlife and wilderness values of the Chugach and the USFS may ultimately be open to legal challenge for allowing current motorized uses. There are very limited non-motorized use opportunities such as afforded by the Kenai portion of the Chugach that are accessible to the residents of Anchorage. Providing non-motorized wilderness experiences for natural quiet should be the priority on the Kenai and the USFS should recommend all but the narrow road areas of the Kenai for wilderness designation.

Climate change is affecting the Chugach in many ways, including the effects of warming that allowed the devastation to Chugach forests by the Spruce Bark Beetle outbreaks as just one prominent example, but there still remain many unknowns affecting fish and wildlife that scientists are racing to determine. In the face of so many climatic impact unknowns, the USFS should take a very cautionary approach to allowing any extractive resource development in the Chugach that could degrade the wilderness character of its Roadless Areas. The USFS has recognized climate change as a threat to the Chugach but has yet to recognize that it must also change its management priorities to protect the future of the Chugach's natural values. To protect those values, the Chugach should remain a wilderness forest.

The proclamation boundary of the Chugach National Forest established by President Theodore Roosevelt in 1907 encompasses all of the waters of Prince William Sound and the USFS has a responsibility to manage the waters of the Sound just as much as it does the uplands and islands and should not cede that responsibility to the State of Alaska. The Exxon Valdez Oil Spill

(EVOS) proved just how much the waters and forest uplands are integral parts of one ecosystem that should be managed as such and not fragmented by artificial governmental jurisdictions. To that point, the Forest Plan is flawed in not fully recognizing that responsibility and needs to be stronger in having the USFS take responsibility for management of the whole Prince William Sound ecosystem.

Again, thank you for the opportunity to comment on the proposed revision of the Chugach National Forest Plan. Please keep me informed of your next steps and provide me with all newsletters and CD's of documents as they become available.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen E. Smith", with a stylized, cursive script.

Allen E. Smith

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