

**Alaska Wilderness League \* Audubon Alaska \* Environment America  
Eyak Preservation Council \* Sierra Club – Alaska Chapter  
WildEarth Guardians \* The Wilderness Society**

November 1, 2018

Chugach National Forest  
Plan Revision Team  
161 East 1st Ave Door #8  
Anchorage, AK 99501

Submitted electronically

Dear Plan Revision Team,

The groups named above write to submit comments on the Draft EIS and the draft plan for the Chugach National Forest. Collectively, we represent more than 6,000 members in Alaska and 1.5 million throughout the country who treasure Alaska's wilderness resources, and we appreciate the opportunity to comment on these materials.

To start, we would like to thank the Forest Service for the development of the Wilderness recommendation found in Alternative D. We appreciate that this alternative was developed acknowledging the importance of protecting the wilderness experience in the vast majority of the Wilderness Study Area, which is of great interest to our membership, both in Alaska and nationally as well. Wilderness areas also help to support healthy populations of birds and wildlife, which in turn form the foundation for recreation and tourism including wildlife viewing and birding.

We recommend a few adjustments to Alternative D to ensure that the Chugach remains a land of many uses for current and future generations. As we face changes in technology, changes in climate, and a dramatic increase in recreation – particularly in the front country of the Chugach – now is the time for the agency to better protect the integrity of wild lands in the Wilderness Study Area, and not roll back any former management directives for how the WSA is managed. With this goal in mind, we recommend the following adjustments:

1. Adopt Alternative D and its strong Wilderness recommendation for the WSA, with several changes to the map. Given the relative ease of access and multiple user groups that currently utilize lands surrounding Blackstone Bay, we see merit in adopting the maps as proposed in Alternative C for this area. Additionally, we suggest adding in the lands surrounding Lake Nellie Juan and lands within the boundaries of the WSA acquired using EVOS funds into the Wilderness recommendation, to keep these areas whole for future generations to enjoy.
2. Maintain the wilderness characteristic of the WSA, and not just the presently existing characteristics. This plan deviates from past Chugach plans in that it neglects to specifically instruct the agency to maintain the wilderness characteristics of the WSA, leaving ambiguity

around characteristics that forest management should secure. The Forest Service should revert to the language used in the 1984 and 2002 Forest Plans, where the “wilderness character” is preserved. By doing so, the agency will make certain that the eventual inclusion of the recommended areas of the WSA into the National Wilderness Preservation System will be appropriate when a future Congress takes action on the matter.

3. Actively monitor the Wilderness Study Area, to ensure management to wilderness standards. Through the Forest Monitoring Program, we support including a systematic monitoring program that will ensure that changes to the WSA will be addressed before it becomes too late to restore and/or mitigate impacts that harm the wilderness characteristics of the WSA.

4. EVOS-acquired lands in the WSA, at a minimum, should have wilderness quality management. The agency can help ensure a baseline level of protection by providing a Wilderness Study Area management prescription for the EVOS lands that fall within the WSA. Such a designation would not preclude or displace the protections afforded the parcels when they were acquired by the Forest Service.

5. Clarify that Section 1110(a) of ANILCA only applies to traditional motorized activities in the WSA. Congress rightfully protected the motorized uses that were necessary to maintain traditional activities in the Chugach National Forest at the time ANILCA passed. We are in full support of a management plan and other regulations to accomplish that aim. That said, Congress did not protect recreational use as a traditional activity, nor did the technology that exists today even come close to providing for the type of recreational access that users of the Chugach can take part in today within the Wilderness Study Area.

Motorized recreation is an important use of the Chugach in non-wilderness areas, and we appreciate the balance that was struck in the Kenai Winter Access Plan. However, recreational motorized use by snowmachine is not a traditional activity, does not fall within Section 1110(a) of ANILCA, and should not be allowed in the Wilderness Study Area.

In addition to protecting the WSA, we also hope that this management plan process will maximize sustainable opportunities for recreation, business, traditional activities, and more throughout the forest. At a time when Alaska’s economy is at a transition, the Chugach National Forest provides numerous ways for seasonal and year-round employment that can exist in perpetuity with proper management. To best implement an approach that places ‘everything in its right place’ within the Chugach, we recommend the following adjustments to the draft plan:

6. Develop a winter-specific Recreation Opportunity Spectrum (ROS), and commit to undertaking winter Travel Management Planning (following Subpart C of the Travel Management Rule) to ensure sustainable winter motorized management. Each year – simply because of technological advances – new areas of the Chugach are becoming accessible to motorized recreational users. A dramatic increase in non-motorized and motorized users alike has taken place in recent years. At the same time, climate change is changing the intensity of winter storms, and altering the location of reliable snow. A winter-specific ROS and a

commitment to undertaking Travel Management Planning would allow the Forest Service to respond to changes in technology, use patterns, and climate, while still providing motorized access to areas best suited for such activities.

7. Incorporate Roadless Rule protections for all Inventoried Roadless Areas in the Management Plan. With a potential state-specific Roadless Rule in the works for Southeast Alaska, this plan should incorporate existing protections from the 2001 Roadless Rule for Inventoried Roadless Areas of the Chugach, as today the Forest and the public greatly benefit from the conservation measures provided by this rule. Specifically, the plan should clarify that exemptions allowing road construction or re-construction activities should be guided by the standards of the Roadless Area Conservation Rule, and that timber should not be removed unless provided for by the Roadless Area Conservation Rule.

We thank the Forest Service for considering these comments to the Draft EIS. The general direction of this planning process is promising and represents thoughtful consideration to the comments received to date. We look forward to offering additional thoughts as this process continues.

Sincerely,

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