

Data Submitted (UTC 11): 10/23/2018 8:00:00 AM

First name: Hilary

Last name: Eisen

Organization: Winter Wildlands Alliance

Title: Policy Director

Comments: Comments from Winter Wildlands Alliance are attached as "WWA Chugach DEIS comments.pdf" along with two additional attachments: "Attachment 1_Trustees ANILCA comments.pdf" and "Attachment 2_ROS Setting Characteristics.pdf"

A hard copy can be provided upon request, if there are any issues downloading or opening the electronic files.

Thank you,

Hilary Eisen

Thank you for the opportunity to submit comments on the draft Environmental Impact Statement (DEIS) and draft plan for the Chugach forest plan revision. Winter Wildlands Alliance is a national non-profit, whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Formed in 2000, WWA has grown to include 40 grassroots groups in 16 states - including Alaska Quiet Rights Coalition - and has a collective membership exceeding 50,000. WWA has members and supporters who live near and recreate on the Chugach, and who visit the forest from the lower 48 in order to experience the unparalleled winter wildlands and opportunities for human powered winter recreation that the forest offers. Backcountry skiers, cross-country skiers, snowshoers, ice climbers, and fatbikers greatly value the winter recreation opportunities available on the Chugach. An important element of these recreation experiences is undeveloped and wild settings that they occur within. Protecting wilderness character on the Chugach, especially within the Nellie Juan-College Fiord Wilderness Study Area, is also of great concern to our members. Overall, we are supportive of Alternative D. In these comments we offer rationale for our support of Alternative D and suggested modifications to this Alternative and the draft plan to consider as you develop the revised plan.

Before we delve into our comments and recommendations for specific parts of the plan, we want to suggest that you consider re-organizing how the various elements of the plan are presented. As drafted, desired conditions and the plan components that support them are not easy to connect for any given management area. Although we can see why the Chugach chose to describe desired conditions for all management areas first and then go into standards, guidelines, suitability, and other plan components for each later, it is difficult to track what exactly is being proposed for any given management area and how the plan components support, or don't support, the desired conditions. It would be much easier to comprehend what the Forest Service is proposing for each Management Area if all of the plan components and discussion for any given Management Area were grouped together. Finally, we found it odd that

none of the plan components have numerical values or identifying nomenclature. In other forest plans that we have read the Forest Service identifies components by first, whether it's for a specific area (ex: MA1) or forest-wide, then their type (DC - desired condition, OB - objective, ST - standard, etc), the resource (ex: REC for recreation), and then a number. For example, from the recently finalized Flathead plan, forestwide desired conditions for watersheds are indicated as FW-DC-WTR 01-17. This type of organization makes it much easier for the public to comment

on specific plan components and it is much more clear as to what specifically the final plan requires during implementation. We suggest that the Chugach review the Flathead, Inyo, or other early adopter plans and consider applying the same organizational principals that those forests have utilized in their revised plans.

Wilderness Study Area Management

We commend Chugach for responding to public comments supporting continued protection of the Nellie Juan-College Fiord Wilderness Study Area (WSA) and an increased wilderness recommendation within the WSA. However, while we appreciate that the Chugach has developed Alternatives that recommend more of the WSA for Wilderness, there is still work to be done to maintain the protections for the WSA that have been in place since the early 1980s. We are concerned that in the draft plan the Chugach has proposed changes to WSA and recommended wilderness management that backtrack from previous protections in the western Prince William Sound. Overall, we support the Wilderness recommendation in Alternative D, modified to include the lands around Jackpot Bay, Paddy Bay, Elrington Island, all national forest lands on Knight Island, and the Nellie Juan Lake area, and to exclude Blackstone Bay. This modified alternative best supports the wildlife (terrestrial and aquatic), ecology, and human interests of the area, including the public's desire to see the western Prince William Sound protected.

Importance of wilderness character

We are concerned that the draft plan changes the desired condition of maintaining 'wilderness

character' to maintain 'existing character' when discussing Management Area 1 (WSA). The term wilderness character is specified in the 1984 and 2002 Forest Plans and ties area management to specific, definable qualities, including intact natural systems and undeveloped character. It also meets the direction of USFS Alaska Region policy to manage the WSA in the same way as national forest wilderness areas in Alaska, pending further action by Congress.¹ (1 R10 FSM 2320.2 Objectives: Manage designated wilderness and the wilderness study area to meet the spirit and intent of the 1964 Wilderness Act, while recognizing and allowing for specific exceptions authorized in ANILCA and R10 FSM 2320.3 Policy: Subject to valid existing rights, the wilderness study area shall, until Congress determines otherwise, be administered to maintain presently existing character and potential for inclusion into the National Wilderness Preservation System. Management of the study area will follow the same direction provided for wildernesses established by ANILCA, to the extent consistent with law.)

Changing to 'existing character' is a much looser standard with no obvious definition. It can easily be inferred by future managers to accept constant change in conditions, including increasing development in the western Sound. This would, over time, degrade the wilderness character within the WSA, which would be in conflict how the Forest Service must manage the WSA.

As far as we can tell, the reason that the draft plan changes this desired condition from maintaining wilderness character to "presently existing character" is because of the sentence

from the Region 10 Supplement 2300 2008-2, section 2320.3 cited on page 24 of the draft plan.² ("Subject to valid existing rights, the wilderness study area shall, until Congress determines otherwise, be administered to maintain presently existing character and potential for inclusion in the National Wilderness Preservation System.

Management of the study area will follow the same direction provided for wildernesses established by ANILCA, to the extent consistent with law.")

It does not appear, however, that the Chugach is interpreting this sentence in its full context. The Supplement goes on to discuss how the Wilderness Act should be the model for WSA management. It is our firm belief that the Forest Service cannot manage the WSA in the "same direction provided for wilderness established by ANILCA", as required by Region 10 policy,

without specifically striving to manage to maintain "wilderness character."

As per the 1987 Wilderness Study Report and EIS, the WSA must be managed to retain its presently (1987) existing wilderness character until Congress acts upon the Forest Service's recommendations. In addition, both Forest Service policy and ANILCA require that the Forest Service manage the WSA in much the same way as Wilderness established under ANILCA, which "have the same meaning as when used in the Wilderness Act".³(3 See ANILCA Sec. 12(13))

Under the Wilderness Act, the primary purpose of designating Wilderness is to protect an area's Wilderness character.⁴ (4 See 1964 Wilderness Act (Public Law 88-577) Section 2(a), which established the National Wilderness Preservation System "for the protection of these areas, the preservation of their wilderness character" (emphasis added))

This term, "wilderness character" has a very specific meaning that is lost if the draft plan simply requires that "presently existing character" be maintained. The definition of "wilderness

character" has been jointly agreed upon by all of the federal land management agencies that manage Wilderness areas - it is very clear and guides management to achieve specific social and ecological qualities. In contrast, "presently existing character" does not have a clear meaning or legal definition. The revised plan should continue to provide clear and consistent direction on how the Chugach intends to manage the WSA in the future. In all places where the draft plan

refers to actions or intentions to manage for "presently existing character" within the WSA it should be changed to "wilderness character".

The Forest Service, and the Chugach, have the discretion to preserve wilderness character on lands it recommends for Wilderness or WSA lands. This discretion was recently affirmed with two court cases in Montana - Ten Lakes Snowmobile Club v US Forest Service⁵([https://earthjustice.org/sites/default/files/files/17-10-](https://earthjustice.org/sites/default/files/files/17-10-18%20Doc.%2064%20Order%20on%20Summary%20Judgment.pdf)

[18%20Doc.%2064%20Order%20on%20Summary%20Judgment.pdf](https://earthjustice.org/sites/default/files/files/17-10-18%20Doc.%2064%20Order%20on%20Summary%20Judgment.pdf), see specifically pages 33-34

) and Bitterroot Ridge Runners Snowmobile Club v. US Forest Service.⁶ (6 <https://www.casemine.com/judgement/us/5b4f64947ba35f5d386e29ee>, see specifically pages 18-21

) In both cases the Court upheld the Forest Service's decision to manage for, and take action to restore, wilderness character on lands not formally designated as Wilderness.

The final plan should restore the 1984 and 2002 Forest Plan language to maintain the

"wilderness character" of the WSA. This change would neatly tie together MA1 Management Intent, Objectives, Standards, and Guidelines and eliminate the potential for confusion and disagreement that may result from the proposed "existing character" language.

We are also concerned that the draft plan removes the WSA from the Forest Monitoring Program. This is a change from the current Forest Plan, which promises to monitor the 'wilderness character' of the area. We believe monitoring is essential for responsible and balanced management of the WSA. Over the time that the Forest Service has managed the western Prince William Sound it has undergone significant periods of change, including from the Exxon Valdez oil spill, increased visitation, and other social and environmental factors.

Monitoring for change can be cost-effective and is key to informing the Forest Service on whether the character of Prince William Sound is being maintained. It also meets the proposed Plan's criteria for the monitoring program, specifically bullets 5 and 7 on page 82. The final revised plan should include the Forest Monitoring Program described in Appendix A. This monitoring is essential for the Forest Service to effectively manage the WSA to recover the Wilderness resources damaged during the 1989 Exxon Valdez oil spill. It is also essential to understanding and addressing the growth in snowmachine use within the WSA.

Non-conforming uses

We are pleased to see that the draft plan includes objectives to draft Forest Orders addressing the use of helicopters and drones in the WSA. Such forest orders will ensure that future generations can enjoy the same solitude and quiet in the WSA as we do today. We also encourage the Forest Service to expand these objectives to also include a Forest Order or other measure to address recreational use of chainsaws, which is currently having a damaging impact to wilderness character throughout the WSA. We support legal use of chainsaws for ANILCA purposes such as subsistence, but we urge the Forest Service to address the ongoing and unnecessary chainsaw vandalism that is becoming widespread along beaches in the western Sound. In addition, rather than relying solely on a future forest order to protect the wilderness character in the WSA, the forest plan should also include suitability components stating that helicopter, drone, and recreational chainsaw use are not suitable within the WSA. This is similar to what the Custer Gallatin National Forest included in its proposed action⁷. (7 The following plan component is included in the Custer Gallatin Proposed Action: FW-SUIT-RWA 08 Recommended wilderness areas are not suitable for recreational and commercial drone launching and landings. Drone use may be allowed for administrative purposes or in approved research projects.)

The final revised plan should clearly articulate where recreational snowmachine use is suitable on the Chugach National Forest and where it is not. To do this, the final revised plan should include a winter-specific Recreational

Opportunity Spectrum (which we discuss later in these comments), and it should include plan components that relate back to the winter ROS. Not only should recommended Wilderness have a primitive winter ROS setting, the plan should clearly state that recreational snowmachine use is not suitable within the WSA and include an objective similar to that discussed above, stating that the Chugach will not designate recommended wilderness areas for OSV use when it completes winter travel management planning. We understand that ANILCA provides for special, limited exceptions (subject to reasonable regulations) to the rule in the lower 48 that motorized vehicles are not allowed in designated Wilderness and that for this reason some OSV use may be allowable within the WSA and recommended Wilderness as well. These exceptions, however, must be accommodated in a way that most effectively minimizes unnecessary adverse impacts to both tangible and intangible wilderness values. Congress did not intend for ANILCA to emasculate the Wilderness Act in Alaska.

Section 1110(a) of ANILCA, titled "Special Access [and Access to Inholdings]," provides only a limited, special exception, subject to reasonable regulations, for the use of snowmachines for truly traditional activities. Congress intended that snowmachines could be used for transportation for traditional activities[mdash]consumptive uses such as hunting, trapping, fishing, or berry picking (the examples used in the Senate Report)[mdash]but not for purely recreational riding. Purely recreational riding was and is not a traditional activity. Congress intended that traditional activities mean those activities that are indicative of a rural, utilitarian Alaska lifestyle[mdash]not purely recreational pursuits. Congress added this provision to insure that Alaskans could continue their on-going traditional activities even if they would now take place in a newly- created national park or Wilderness area. Trustees for Alaska provided extensive comments on the issue of recreational snowmachine use within protected areas, as permitted and defined in ANILCA Section 1110(a), in their 2016 comments on the Wrangell-St Elias National Park backcountry and Wilderness stewardship planning process. We have included these comments as Attachment 1 to provide the Forest Service with detailed legal arguments on this issue.

The wisdom of excluding recreational snowmachining from the definition of traditional activities becomes more important every year, as snowmachine technology improves dramatically and recreational riding increases exponentially. As a result, the adverse impacts[mdash]not just social, but also ecological, for example to wildlife and clean air and water[mdash]created by recreational snowmachines continue to grow substantially. In this forest plan revision, the Chugach has an opportunity to stem the tide of adverse impacts that come from allowing recreational snowmachining in areas where the forest intends to manage for wilderness values.

Issues related to the 1989 Exxon Valdez oil spill

We urge the Chugach National Forest to keep its promise to restore lands and resources still damaged by the 1989 Exxon Valdez oil spill (EVOS). The EVOS Trustee Council still lists the WSA as unrecovered from the oil spill because of lingering oil and other factors. The Forest Service should more clearly acknowledge that the WSA is a recovering resource. Management must include restoring and maintaining the wilderness qualities damaged by the spill, as described in the Exxon Valdez Oil Spill Restoration Plan.

The Forest Service should treat all forest lands within the WSA boundary as part of the WSA. We oppose the proposed removal of certain lands around Jackpot Bay, Paddy Bay, and Knight Island from the WSA Management Area. Moving these lands to the "EVOS Acquired Lands" Management Area is a change from the current Forest Plan that substantially weakens their protection. Under the proposed change, lands and waters

can more easily be developed or altered if they fall under MA6 versus MA1. This goes against the intent of the 1997 federal purchase of these lands, aimed at restoring and maintaining their wilderness qualities. Likewise, we oppose excluding these EVOS acquired lands around Jackpot Bay, Paddy Bay, and Knight Island from the wilderness recommendation that accompanies the proposed Forest Plan. These lands were purchased with Exxon Valdez oil spill settlement funds and are legally required to be managed "in perpetuity for conservation and wilderness purposes." Indeed, these lands were selected for purchase because of their location within the WSA boundaries. Public testimony in 1996 leading up to the Chenega Purchase Agreement called for these lands to be protected because of their wilderness quality and the Chenega Corporation only sold these lands to the Federal government because of the understanding that they would be managed for conservation and wilderness purposes. The only way in which the Forest Service will fulfill these various obligations is to classify all lands within the WSA, including all lands purchased from the Chenega Corporation in 1997, as Management Area 1, and to recommend the EVOS acquired lands around Jackpot Bay, Paddy Bay, and Knight Island for wilderness designation. Doing otherwise will violate the Chenega Purchase Agreement.⁸ (8 See Chenega Purchase Agreement Sec. 6a, page 132: "Chenega is only willing to undertake the sale of the Federal and State Conveyance Lands under this agreement because of their intended management for conservation and wilderness purposes respectively by the United States as National Forest System Lands[hellip]lands purchased pursuant to this Agreement shall be maintained in perpetuity in their natural, pristine state in accordance with the terms of the Restrictive Covenants ...")

Not only is the Chugach required to treat the Chenega Purchase Agreement lands as they do other lands within the WSA, there is precedent for the Forest Service to treat these EVOS lands within the WSA as WSA lands. For example, when the Hyalite-Porcupine-Buffalo Horn WSA on the Gallatin National Forest was designated by Congress in 1977 it contained a vast checkerboard of privately owned land. In the intervening years, all of the private land within the WSA has been transferred to Forest Service ownership, consolidating all of the lands within the WSA boundary as Forest Service lands. The Gallatin National Forest considers all of the land

within the WSA boundary to be WSA and does not differentiate between "original" and newly acquired lands under current management nor are they making any sort of distinction as they revise their forest plan. Likewise, the Chugach should not differentiate between EVOS lands within the WSA and other Forest Service lands within the WSA - all should be considered part of the WSA and classified as Management Area 1. Furthermore, the Chenega Purchase Agreement lands should be included in the wilderness recommendation in the revised forest plan.

Roadless Areas

Given that Alaska is pursuing Rulemaking to carve out an exemption to the National Roadless Rule, the Chugach should add a new Management Area into all of the Alternatives as it develops the FEIS, for lands comprised of Inventoried Roadless Areas (IRAs). The name for the MA should be Roadless, Backcountry, Conservation, or something similar. The following plan components should accompany the MA:⁹ (9 The plan components offered here are similar, and in some cases identical, to components for IRAs proposed by national forests in New Mexico that are currently revising their forest plans under the 2012 planning rule.)

* Desired Condition: These areas provide large, relatively undisturbed landscapes with high scenic quality that are important for backcountry recreation where visitors feel as if they are in a natural place devoid of roads where they can explore, observe nature, and challenge themselves. Because these lands are minimally disturbed, they provide clean drinking water and function as biological strongholds for populations of at-risk wildlife and plants. They also serve as buffers against the spread of non-native invasive plant species and serve as reference areas for study and research.

* Desired Condition: This MA will be managed for primitive, semi-primitive non- motorized, and semi-primitive motorized recreation opportunity settings (ROS).

Management activities conducted within this MA should be consistent with the scenic integrity objective of High.

* Standard: A road shall not be constructed or reconstructed, unless the responsible official determines that a road is needed according to the circumstances allowed in the Roadless Area Conservation Rule (66 FR 3244).

* Standard: Timber shall not be cut, sold, or removed, unless the responsible official determines that activities meet the circumstances provided in the Roadless Area Conservation Rule (66 FR 3244).

* Guideline: When developing the proposed action for a NEPA project, consider conducting restorative activities such as road decommissioning and mine reclamation within the project area to move towards desired conditions.

* Suitability of Lands: Not suitable for commercial timber activities.

* Suitability of Lands: Not suitable for road building.

Sustainable Recreation Management

The 2012 Planning Rule aims to balance multiple-uses, including recreation, with the restoration and maintenance of forest and water ecosystems. To do so, revised forest plans must include plan components that address sustainable recreation, including recreation settings, opportunities, and access; and scenic character.¹⁰ (10 (36 CFR 219.10 (b)(1)(i)).) These plan components should take into account the outdoor recreation economy and opportunities to connect people with nature. Of course, all of these elements are interrelated. As people connect with nature through recreation; they contribute to the outdoor recreation economy; and the protection of natural resources is integral to the sustainability of recreation opportunities. Therefore, protecting the Chugach's natural resources and environment is an essential element of sustaining the region's outdoor recreation economy.

We appreciate that the 2012 planning rule includes a new focus on sustainable recreation, and we support the language in the DEIS and draft plan that addresses this topic. Recreation is the path through which most people experience national forests and it is essential that management for, and impacts to, recreation be at the forefront of forest planning. Historically, with the exception of a few focused areas, recreation has been treated as an afterthought - a side benefit of national forest lands after other multiple uses. However, recreation on our national forests doesn't occur in just a few focused areas. The growth in recreation, particularly dispersed recreation, means that the Forest Service must consider how recreation management is integrated into other management activities across the full extent of the national forest.

Backcountry skiing, Nordic skiing, and snowshoeing are activities with rapidly growing participation rates. According to the Outdoor Foundation's 2017 participation report¹¹ (11 Outdoor Foundation. 2017. Outdoor Recreation Participation Topline Report. Available at <https://outdoorindustry.org/wp->

content/uploads/2017/05/2017-Outdoor-Recreation-Participation-Report_FINAL.pdf) backcountry skiing is among the fastest-growing outdoor activities, with participation increasing by 142% in the past 10 years. Many other types of outdoor recreation are on the rise as well.

This growth in outdoor recreation is encouraging because we see more people invested in caring about the places that provide these recreational experiences. At the same time, this growth brings a new urgency to the need to manage for sustainable recreation. With sustainable recreation management we can ensure that the Chugach National Forest provides opportunities for the recreating public to appreciate and enjoy public lands while at the same time ensuring that this enjoyment does not degrade the natural environment.

We appreciate that the draft plan includes plan components and language related to recreation opportunities, settings, special uses, access, and scenery. A full complement of plan components, including measurable objectives that link plan components to monitoring and adaptive management, is necessary for the revised plan to provide a clear path towards achieving the 's desired conditions. In addition to the recreation plan components included in the draft plan, we suggest the following additional components:

- * Desired Condition: Forest settings reflect healthy and resilient landscapes, provide a diverse sense of place for community residents and visitors, and enhance high quality sustainable recreation opportunities.
- * Guideline: Front-country areas provide initial contact points for forest users and developed recreation settings where people can engage in a variety of recreation activities including scenic driving, skiing, climbing, hiking, camping, and picnicking.
- * Desired Condition: Resources, skills, energy, and enthusiasm of partners and communities are engaged to maintain or enhance recreation settings on the forest.
- * Guideline: The Forest Service will work with local and national partners to educate users on best practices for reducing conflict and to sign shared use trails with information on trail etiquette and to promote responsible behavior.
- * Guideline: Wherever possible, the Forest Service will prioritize the development of partnerships with non-profit organizations and local government entities whose missions complement the Forest Service's mission and desired objectives.
- * Standard: Campground hosts and other private partners who interact with the public will be trained to provide interpretive services in addition to maintenance and administrative duties.
- * Desired Condition: Recreation settings retain their natural character as development and populations in the region continue to grow and new forms of recreation emerge.
- * Standard: Design and construction of new projects must follow the assigned Recreation Opportunity Spectrum (ROS) classification for the specific management or geographic area location.

Recreation Opportunity Spectrum

The Planning Rule requires that a plan "must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses," including outdoor recreation.¹² (12 36 C.F.R. [sect] 219.10(a)) The Forest Service is required to use the Recreation Opportunity Spectrum (ROS) to integrate recreation with other resource values to derive sustainable recreation outcomes. While ROS does not fully capture what quality of recreation opportunities and experiences one might expect in a

certain area the ROS is the best tool the Forest Service has for forest-scale planning related to development of infrastructure and appropriate levels of motorized use and access.¹³ (13 FSH 1909.12) For backcountry skiers seeking out undeveloped, non-motorized areas to ski, ROS is a very important element of forest management. The 2012 Planning Rule states that plans "must include plan components, including standards or guidelines, to provide for sustainable recreation," including "[s]pecific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired [ROS] classes."¹⁴ (14 FSH 1909.12, ch. 20, [sect] 23.23a(2)(g)) We are glad to see that the draft plan includes a guideline stating that "Recreation management activities, including travel management decisions and permitted recreation use, should be consistent with recreation opportunity spectrum classes as mapped. Levels of recreation use and development should be consistent with recreation opportunity spectrum class characteristics shown in table 7."¹⁵ (15 Draft plan page 53) We are supportive of this guideline. However, the final plan must as include detailed desired conditions for each ROS setting and additional plan components that directly tie future management actions and decisions in with the ROS desired conditions. Such additional plan components help to integrate the ROS with forest management and ensure that the desired conditions outlined in the ROS are achieved over the life of the plan. Tables 7 and 8 provide this information to some extent, but the final plan must include actual plan components - desired conditions, standards, guidelines, etc. - related to the ROS.

The Washington Office is currently working on Chapter 10 of Forest Service Manual 2300 to provide further direction concerning sustainable recreation planning under the 2012 Rule. In this manual the Washington Office outlines ROS settings characteristics so that these settings and characteristics are consistent across the entire Forest Service system. Of particular relevance to these comments are tables in the draft manual outlining ROS settings characteristics, which we have included here as Attachment 2. These tables are consistent with national USFS mapping protocols, which will soon be posted in the Forest Service's corporate system. They have gone through review and testing by recreation planners and GIS specialists within the Forest Service and we recommend that the Chugach refer to these tables and adjust its ROS settings accordingly, to be consistent with agency standards.

We are very concerned that the Chugach does not have a winter-specific recreation opportunity spectrum and instead simply has a hybrid category "semi-primitive non-motorized winter

motorized allowed". Given the distinct differences in use, access, and setting on the Chugach during winter versus summer, the revised plan should include separate recreation opportunity spectrum classifications for summer versus winter. In addition, winter ROS settings will set the stage for winter travel planning, required under the 2015 Over-Snow Vehicle Rule, by helping the Forest Service better define where over-snow vehicle use is and is not suitable.

Incorporating winter and summer ROS settings is something that other early adopters of the 2012 planning rule, the Flathead and Inyo National Forests, has taken, and we suggest looking to the Flathead's recently finalized plan for language related to winter recreation. Based on the winter recreation language in the Flathead plan,¹⁶ (16 Flathead National Forest revised plan, available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd567581.pdf) we suggest the following:

? Desired Conditions

*

- * Winter recreation settings provide a range of opportunities as described by the recreation opportunity spectrum.
- * Winter primitive recreation opportunity spectrum settings are large, remote, wild, and predominantly unmodified.

Winter primitive recreation opportunity spectrum settings provide quiet solitude away from roads and people. There is no motorized activity and little probability of seeing other people. Constructed trails that are evident in the summer months are covered by snow, making these settings appear even more natural and untouched by human management.

- * Standard: Over-snow vehicle use is not permitted in primitive areas.

- * Winter semi-primitive non-motorized recreation opportunity spectrum settings provide backcountry skiing, splitboarding, Nordic skiing, fatbiking and snowshoeing opportunities. Trails are un-groomed and often not marked. Rustic facilities, such as historic cabins and yurts may exist but are rare.

- * Standard: Over-snow vehicle use is not permitted in semi-primitive non- motorized areas.

- * Winter semi-primitive motorized recreation opportunity spectrum settings provide backcountry skiing, splitboarding, Nordic skiing, snowshoeing, fatbiking, and snowmobiling opportunities. Routes are typically un-groomed but are often signed and marked. There are vast areas to travel cross-country in designated areas, offering visitors an opportunity for exploration and challenge. Occasionally, historic rental cabins are available for overnight use, and warming huts are available for short breaks.

- * Objective: Site-specific winter travel planning will be initiated within 1 year of plan implementation to determine specific routes and areas within semi-primitive motorized areas where over-snow vehicle use is allowed

- * Winter roaded natural recreation opportunity spectrum settings support higher concentrations of use, user comfort, and social interaction. The road system is plowed and accommodates sedan travel. Winter trails are routinely groomed and may have ancillary facilities such as warming huts and restrooms. System roads and trails often provide staging to adjacent backcountry settings (primitive, semi-primitive non-motorized, semi-primitive motorized). Guided winter recreation activities may also be present.

- * Objective: Site-specific winter travel planning will be initiated within 1 year of plan implementation to determine specific routes and areas within roaded natural ROS areas where over-snow vehicle use is allowed

- * Winter rural recreation opportunity spectrum settings provide high-use ski areas such as Alyeska Resort. These areas are accessed from paved and plowed roads and are generally close to population centers. User comfort facilities such as toilets, restaurants, heated shelter facilities, and information and education are commonly present. Parking areas are large and plowed. Entry points and routes are signed and direct over-snow vehicles to adjacent roaded natural and semi- primitive motorized settings. Non-motorized trails are also typically groomed for Nordic skiing and fatbiking. Rural winter settings provide access for communities and families to celebrate holidays, conduct racing events, and skiing.

- * Objective: Site-specific winter travel planning will be initiated within 1 year of plan implementation to determine specific routes within rural ROS areas where over-snow vehicle use is allowed

- * Standard: Over-snow vehicle use is not permitted off of designated routes within rural ROS areas.

Descriptions of Winter ROS settings and associated suitability for motorized uses must

emphasize that "suitable" does not equate to "designated" in a travel management context. The Chugach could clarify this distinction with a suitability plan component such as FW-ROS-SUIT: "Motorized use is suitable on

designated roads, trails, and areas in desired semi-primitive

motorized, roaded natural, and rural ROS settings." Likewise, the final EIS and final plan should make clear that winter ROS settings do not preclude travel planning decisions. Chapter 10[sect]11.2 of the revised Travel Management Planning directives state "The Responsible Official generally should avoid including travel management decisions in land management plans prepared or revised under current planning regulations (36 CFR Part 219, Subpart A). If travel management decisions are approved simultaneously with a plan, plan amendment, or plan revision, the travel management decisions must be accompanied by appropriate environmental analysis." Appropriate environmental analysis would include compliance with the minimization criteria, as described in 36 C.F.R. [sect] 261.14. In short, when designating areas or trails available for ORV use, agencies must locate them to:

"1) minimize damage to soil, watershed, vegetation, or other resources of the public lands;

1. minimize harassment of wildlife or significant disruption of wildlife habitats; and

2. minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands."

Given that application of the minimization criteria are not part of the process wherein ROS classifications are assigned, ROS classifications cannot serve a dual purpose as over-snow vehicle area designations. The final revised forest plan should state that site-specific analysis is needed before any on-the-ground changes related to OSV designations are enacted. In addition, the final plan should include an objective to initiate winter travel management planning, under Subpart C of the Travel Management Rule, within 1 year of completion of the Forest Plan revision. This includes cross-checking the Kenai Winter Access Plan with the Over-Snow Vehicle Rule to clarify whether or not the Winter Access Plan is suitable to grandfather in as an OSV designation decision, and beginning the OSV designation process on the rest of the forest.

Integration

The 2012 planning rule requires that revised forest plans integrate sustainable recreation with other multiple use activities.¹⁷ (17 36 C.F.R. [sect] 219.10(a)) To meet this requirement the revised plan must include a full suite of sustainable recreation plan components that are integrated with plan components related to other uses. The final EIS should explain how management direction across each forest, for each use, fits within the ROS setting for any particular area. We suggest the following additional plan components to further integrate sustainable recreation with other uses:

* Standard: Forest management activities and direction are aligned with Recreation Opportunity Spectrum setting and characteristics.

* Desired condition: Forest management activities are planned to enhance recreational opportunities and infrastructure, or where they might be negatively impacted, to avoid, minimize, and/or mitigate those impacts, consistent with management area direction.

* Standard: When developing projects, the forest shall identify specific needs related to sustainable recreation and make them an explicit part of the project purpose and need.

* Guideline: The Forest Service should coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.

Concluding Thoughts

We appreciate this opportunity to comment on the Chugach draft EIS. Overall, the Forest Service is moving in the right direction with the draft plan. We appreciate that the Chugach has been responsive to the public's desire for stronger protections within the WSA. Alternative D rightly recommends much of the WSA for wilderness. However, an important aspect of protecting the WSA is how it is managed, not just whether it is recommended for Wilderness designation. We hope that the Chugach will consider, and apply our suggestions. Likewise, we feel there is more work to be done in this plan to improve sustainable recreation management, particularly in regards to winter recreation planning and management. The Kenai Winter Access Plan does an admirable job of minimizing conflict and balancing winter recreation interests on the Kenai Peninsula. This forest plan revision is an opportunity for the Chugach to set the stage for winter travel planning across the rest of the forest so that one day the entire forest will have the same level of thoughtful winter recreation planning as we see in the Kenai.

Attachment 1_Trustees ANILCA comments.pdf

Attachment 2_ROS Setting Characteristics.pdf

Attachment 1_Trustees ANILCA comments.pdf

Attachment 2_ROS Setting Characteristics.pdf