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Title:

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Ms. Terri Maceron, Supervisor

Chugach National Forest

161 East 1st Ave., Door 8

Anchorage, AK 99501

Dear Ms. Maceron,

The following are the comments of the Alaska Quiet Rights Coalition (AQRC) on the Chugach National Forest Proposed Forest Plan. Thank you for the chance to participate in this very important planning process.

Founded in 1996, AQRC's mission is to maintain and restore natural sounds and natural quiet in Alaska through advocacy and education for the benefit of people and wildlife. More particularly, we're dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, visitors, future generations, and wildlife. We believe that natural sounds and natural quiet should receive the same consideration given to other ecological values, such as clean air and water, fish, wildlife, soils, vegetation, scenic beauty, and wilderness character. Although there are many places in Alaska that look the same as they did 100 or more years ago, very few sound as they did just 10 or 20 years ago.

In addition to protecting ecological values like the ones listed above, one of AQRC's specific goals is a fair and equitable overall balance on the public lands between those managed for motorized recreation, and those managed for quiet, truly traditional forms of recreation like hiking, snowshoeing, cross country skiing, canoeing, and kayaking.

AQRC has signed on to two other detailed group comment letters on the Proposed Forest Plan. Consequently, these comments will be fairly brief, and we'll address just three topics: the natural soundscape; ANILCA Section 1110(a)/recreational snowmachining; and Wilderness.

1. The Natural Soundscape (natural sounds and natural quiet). Many of us remember very well when it was quite unusual to be disturbed by mechanical noises in the outdoors. There was quiet, which was beautiful in itself, and there were beautiful natural sounds, like falling snow and birdsong. These days, that quiet and that chance to hear natural sounds are all too frequently shattered. As we said above, there are many places in Alaska that look the same as they did 100 or more years ago, but very few that sound as they did just 10 or 20 years ago. But "peace and quiet" are still highly valued, and frequently mentioned by visitors to the public lands both in Alaska and Outside as one of the outstanding and most appreciated characteristics of those lands. The Chugach National Forest should seek to protect those values, and where necessary, restore them. And as we also said above, the natural soundscape is just as deserving of analysis and protection as other ecological values that are routinely assessed.

Unnatural noise can harm human health, both mental and physical. Natural quiet and natural sounds can be soothing and can benefit human health. And unnatural noise can harm wildlife as well; one of the best examples is how this can disturb songbirds during the breeding season.

But beyond any measurable demonstration of health effects, many people visit the public lands, especially Wilderness, as a refuge from noisy, busy, crowded daily lives. This certainly includes tourists, whether from Alaska, from other parts of the nation, or from other countries (and these tourists can generate significant

economic benefits). Most of them, we suspect, are not only hoping, but expecting, to be able to hear and enjoy natural sounds, and to experience natural quiet.

We certainly might have missed it, but we weren't able to find anywhere in the Proposed Plan documents any mention of the natural soundscape, natural sounds, and natural quiet. This is a glaring and serious omission. The Chugach Forest Plan should assess the existing natural soundscape, and how it would be impacted by the various alternatives. As far as we know, the Chugach does not have a Natural Soundscape plan. If this is true, the Forest Plan should require that one be developed, and the state of the soundscape closely monitored so as not only to protect natural sounds and natural quiet, but to restore them where appropriate.

2. ANILCA Section 1110(a)/Recreational Snowmachining. The Proposed Forest Plan, relying on a badly flawed interpretation of Section 1110(a) of ANILCA, would allow recreational snowmachining on lands supposedly managed as Wilderness--and would allow recreational snowmachining even on lands officially designated by Congress as Wilderness. This is a very significant mistake. The Congress never intended, when it acted more than 35 years ago, that Section 1110(a) would sanction recreational snowmachining in Alaska when it is prohibited in designated Wilderness in the entire rest of the country--that is, prohibited on public lands that most people would characterize as considerably less wild than those in Alaska. Recreational snowmachining is not a traditional activity; hunting, fishing, trapping and berry picking presumably are. Congress intended that snowmachines could be used for transportation to engage in those traditional activities--but not for purely recreational riding itself. This is the interpretation the National Park Service adopted for the Wilderness of Old Denali National Park, and should be adopted by other federal land managing agencies in Alaska as well. If recreation is included in the definition of traditional activities, it leaves virtually no known use of snowmachines restricted, and leaves the qualifier "for traditional activities" without meaning.

The wisdom of excluding recreational snowmachining from the definition of traditional activities becomes more apparent every year, as snowmachine technology improves dramatically and snowmachines seem to be able to go almost anywhere, and at high speeds; and as recreational riding increases substantially throughout the country, including many parts of Alaska. As a result, the adverse impacts and conflicts created by recreational snowmachines continue to grow substantially. Furthermore, the fact that snowmachines rarely need to stay on trails but can, and generally do, roam cross country, means that they can be encountered nearly anywhere, making it virtually impossible to plan a non-motorized excursion free of encounters and conflicts with snowmachines unless lands closed to recreational snowmachining are designated (this would not be as true, for example, of motorboats, which are restricted to a waterbody).

And there are other adverse impacts from recreational snowmachining besides noise. These include ecological impacts like air and water pollution and snow compaction; and social impacts such as the marring of scenic beauty-- the tracking, often extensive, of lakes, meadows, and hillsides, on otherwise beautiful snowscapes--and the acrid smell of snowmachine exhaust, lingering for some time at ground level on windless days.

The Chugach should encourage visitors to enjoy the Forest with muscle, rather than motorized, power; the health benefits of muscle-powered recreation are especially important at a time when obesity is a serious state and national problem.

An additional benefit of recreating on one's own power is coming to better understand our state and nation's history: how tough, both physically and mentally, and how self-reliant, our ancestors could be. In traveling as they did one gains substantially added respect for their accomplishments in sometimes very harsh environments and conditions.

There are millions of acres of public lands in Southcentral Alaska that are managed for recreational snowmachining; in fact, the vast majority of those lands--very unfairly--are managed for snowmachining. The Chugach should abandon its misinterpretation of 1110(a) (which is a special, very limited provision for

snowmachine use); prohibit recreational snowmachining on lands managed as Wilderness; and instead provide on those lands some of the few opportunities in the region for quality non-motorized recreation.

3. Wilderness. The Chugach National Forest, at over 5 million acres, includes some of the wildest public lands in the nation. It's an embarrassment that not a single acre of the Forest has been designated Wilderness. At the very least, the entire 2 million acre Wilderness Study Area should be recommended for Wilderness designation. Instead, the Proposed Forest Plan would delete some of the finest lands in the WSA from its Wilderness recommendation--lands like Knight Island, Columbia Glacier, Perry Island, Glacier Island, Culross Island, Esther Island, Port Wells, mainland Knight Island Passage, and Lake Nellie Juan. All of these lands, and the entire WSA, should be recommended in the Forest Plan for Wilderness designation. In addition, significant representative blocks on the Kenai Peninsula should also be included in the Wilderness recommendation. Wild places that are accessible from the road are an extremely valuable resource--in Alaska just as much as in the lower 48. For most people, getting into Prince William Sound is not something that can be done on a regular basis. A visit there is a special trip. But for a large percentage of both Alaskan residents and our visitors, the Kenai Peninsula is highly accessible and can be enjoyed frequently. What a treasure it would be if a significant portion of it could be enjoyed as true Wilderness!

But, alas. While lands managed as Wilderness by the Chugach would provide many, many benefits, and very important ones, under the present management scheme these "Wilderness" lands would by no means be truly wild. Recreational snowmachining is hardly a primitive form of recreation; there's nothing wild about this intrusive, noisy, powerful modern technology. It's ironic, and very discouraging, but Alaskans seeking a true, reasonably accessible Wilderness experience in the U.S. would have to travel to Wildernesses in the lower 48 to find it. Again, it is vitally important that the Chugach Forest Plan prohibit recreational snowmachining in lands managed as Wilderness.

Sincerely,

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