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Terri Marceron, Forest Supervisor

Chugach National Forest

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ATTN: Denise Downie, Lead Planner

November 1, 2018

RE: COMMENTS ON CHUGACH NATIONAL FOREST DRAFT LAND MANAGEMENT PLAN (CLMP) &
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Dear Supervisor Marceron and Lead Planner Downie,

Thank you for the opportunity to comment on the Chugach National Forest Draft Land Management Plan (CLMP) and Draft Environmental Impact Statement (DEIS). I have frequently visited the Chugach National Forest and have actively engaged in commenting on its management and planning issues for nearly thirty years, including when I lived and worked in Alaska. My comments are based on that and my experience with the Alaska National Interest Lands Conservation Act (ANILCA) of 1980, the Wilderness Act of 1964, 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).

SUMMARY STATEMENT:

While the USFS is to be commended for incrementally moving toward increasingly recommending wilderness areas on the Chugach since the 1984 Land Management Plan, it is still falling far short of the mark in those recommendations and far short of public demand for wilderness designation on the Chugach. The 5.5 million-acre Chugach National Forest has been inventoried 98% Roadless Areas, our wildest national forest, yet the USFS recommended wilderness areas fail to take that into full account even in Alternative D and there are no wilderness recommendations outside of the Nellie Juan-College Fiord Wilderness Study Area. The Draft CLMP and DEIS are deficient under the National Environmental Policy Act (NEPA) for not presenting an alternative with the maximum recommended wilderness areas. I do not support any alternative in this draft plan and strongly recommend that the USFS provide a more meaningful Alternative E as a Supplemental EIS that addresses full consideration of the wilderness area potential on the Chugach National Forest. Wilderness protection for most of the Chugach including the Kenai would be the highest and best use of this unique wild forest located next to the largest center of population in Alaska. The Chugach is truly a wilderness forest.

ANALYSIS:

On page 159 of the DEIS, the USFS states that: "Nearly 99 percent of the Chugach National Forest is eligible for recommendation for wilderness area designation due to having ecosystems generally appearing to be affected primarily by the forces of nature; outstanding opportunities for solitude or for a primitive and unconfined type of recreation; are of sufficient size to make preservation and use in an unimpaired condition practicable; and can be managed to preserve wilderness characteristics. Additionally, many areas of the national forest contain ecological, geological, or other features of scientific, educational, scenic, or historical value. The national forest does not have any designated wilderness areas. The Nellie Juan-College Fjord Wilderness Study Area in Prince William Sound, designated in 1980 by Congress through ANILCA, has been managed to maintain the area's character and potential for designation into the National Wilderness Preservation System."

Having said that, the USFS then categorically pivots in the DEIS to analytically dismiss and disqualify most of the Chugach Roadless Areas as not meeting the criteria for wilderness suitability and instead allocates the lands of this magnificent wilderness forest to a full slate of activities in its Recreation Opportunity Spectrum (ROS), many of which are motorized and would diminish the wilderness character of the Chugach Roadless Areas. There is a significant inconsistency between the USFS statement of Chugach forest wilderness values above from page 159 of the DEIS and the proposed allocation of forest lands to ROS activities and the wilderness recommendations subsequently presented in all of the Alternatives.

Further, while the DEIS places Revision Topic 1 land Allocations for wilderness up front as a major need, the actual proposed allocations of land in all the alternatives favor Revision Topic 2 Recreation Opportunities, but more specifically non-wilderness activities. Revision Topic 3 Ecological Sustainability is better served by the designation of wilderness areas than motorized sport vehicles, particularly with the future scenarios of what climate change could do to the Chugach. All of the proposed alternatives could make ecological sustainability on the Chugach unattainable.

Since the passage of the Alaska National Interest Lands Conservation Act (ANILCA) in 1980, the Chugach National Forest has remained 98% Roadless Area 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.

Over 90% of the public wildlands from Anchorage to Denali National Park are already open to recreational snowmachines and there is no justifiable reason to accommodate such uses or any other motorized uses in the Nellie Juan-College Fjord 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.

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, motorized access, and every conceivable recreation use found in the Recreation Opportunity Spectrum (ROS) while continuing to restrict the full potential of Wilderness Areas to be designated on the Chugach. Proposing to reduce the size of the Nellie Juan-College Fjord WSA and eliminate wilderness islands from consideration flies in the face of Congress's intent in ANILCA

and should be rejected. 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.

The USFS has incorrectly interpreted ANILCA Sec. 1110(a) to permit recreational snowmachines in the Nellie Juan-College Fiord WSA. Recreational snowmachining is not a "traditional activity" under ANILCA and is not allowed in congressionally designated WSA's. Use of snowmachines for subsistence is a traditional use.

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 and give the Chugach a chance of attaining ecological sustainability, the Chugach should remain a wilderness forest.

CONCLUSION:

It is disappointing that the USFS has missed an opportunity to fully realize the wilderness value of the Chugach National Forest Roadless Areas and remains locked into its ROS approach to land use allocation. The Draft Land Management Plan/DEIS systematically creates reasons not to recommend wilderness areas to Congress on a national forest that is 98% Roadless Areas. If areas have been inventoried to be Roadless Areas they qualify to be designated wilderness areas by Congress. I strongly urge the USFS to provide an Alternative E Maximum Wilderness Recommendations for public review as a Supplemental EIS.

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

Sincerely,
signed
Allen E. Smith