

10-23-02

USDA Forest Service  
Attn: NFS-EMC Staff (Barbara Timberlake)  
Stop Code 1104  
1400 Independence Avenue, SW  
Washington, D. C. 20250-1140

Copy to  
Regional Forester  
USDA Forest Service, Alaska Region  
P. O. Box 21628  
Juneau, AK 99801-1628

Re: Management Plan for the Chugach National Forest

My name is Jeff Estes, son of Edward R. Estes, a pioneer who came to Alaska in 1917 at the age of 5. Edward R. Estes was honored, after his death, by the twentieth Alaska Legislature in 1998. I was born in Seward, raised in Moose Pass, and completed college in Fairbanks, BSEE 1974. I have worked since then mostly around south central Alaska until 1985. I have been working for the City of Seward Electric Department since 1985 as a Staking and then Field Engineer. My wife Terry Allen Estes is an Environmental Engineer from the University of New Hampshire. We have been married since 1992, and now have 4 children under 6 years old.

I am a 52-year-old lifetime Alaskan instilled from my father and engineering background with a strong code of ethics. I have one-quarter interest in my father's Estes Brothers Store. I have ridden commercial snowmobiles since they were introduced to Alaska in the early 60's. During the 70's, in college, I became an alpine and cross-country skier. I have strong community ties, and have been active until the last few years when children have taken most of my time.

I have managed to go to only a few recent Chugach Forest Plan meetings, but knowing the history of the Forest and the current state of affairs, I feel somewhat qualified to comment and appeal this latest decision.

My major comment at the past meetings was this, "Do not go overboard on addressing the problem of snowmobile/skier conflict when in the Moose Pass area it was not yet a problem."

My concerns about the new Chugach Forest Plan are as follows:

1. Closure of winter motorized access to many of me and my family's traditionally accessed areas.

2. By selective closure areas, the communities of Moose Pass, Hope, Summit, Seward, and Cooper Landing will be cut off from each other by winter snow mobiling.
3. The economic impact of these closures will be significant, making our local businesses suffer and possibly fold.
4. My future inability to show my children the scenic wilderness of our area, and teach them the appropriate respect for the land that I was taught at a young and impressionable age.
5. I had no reasonable amount of time to comment on the final plan prior to its passage.
6. The closure of Trail River Campground, Carter/Crescent Lake, Sterling and Seward Highway from Cooper Landing to Summit Lake and Moose Pass, the area north of Summit Lake, and Russian Lakes trail to Aspen Flats cabin were all added after the comment period.

Sincerely,  
Jeff Estes  
A very concerned citizen

## THE APPEAL

This letter is a Notice of Appeal filed pursuant to 36 CFR part 217, page 46 in the Record of Decision

My name is Jeff Lynn Estes, P.O. Box 173 Moose Pass, AK 99631  
My phone number is 907-288-3155  
My E-mail is [jletma@gci.net](mailto:jletma@gci.net)

The decision I am appealing is the Preferred Alternative as described in the FEIS and the resulting Revised Forest Plan, specifically areas available for motorized and non-motorized winter activities, with modifications as further described in the ROD, as stated on page 3 of the ROD.

The document in which the decision is contained is the Revised Land and Resource Management Plan of the Chugach National Forest Record of Decision, R10 MB-480b. The date of the decision was May 31, 2002 and the Deciding Officer is Regional Forester Dennis E. Bschor.

The specific portion of the document to which I object is:

1. Closure of the Carter / Crescent Lakes area to all winter motorized use.
2. Closure of areas along the Sterling Highway and the Seward Highway from Cooper Landing to Summit Lake and Moose Pass to all winter motorized use.
3. The closing of Trail River Campground on Kenai Lake, south of Moose Pass, to all winter motorized use.
4. The closing of the area north of Summit Lake to all winter motorized use.
5. The closing of Russian Lakes Trail to Aspen Flats Cabin to all winter motorized use

### Item 1-Carter and Crescent Lake- Reason for objecting

This is one of the first areas that I snowmobiled to in the 60's. Due to high altitude and the consequential frequent heavy early and late snowfall, the area is ideal for multi-purpose use. Access by snowmobile is almost a necessity for hunting, fishing, and cross-country skiing. This is especially true for the very young, old, and physically off peak. The access is very steep, long, and treacherous to ski down. To eliminate this area from snowmobile access will have severe economic impact to Moose Pass. The trailhead parking is only 3 miles from town, and people shop either before or after snowmobiling. I personally am used to taking off from my front door and going to Carter / Crescent Lake. I am sure others do the same from down town Moose Pass

where I live. I know of no detailed actual local study showing the contrast between the economics of skiers versus snowmobilers. In addition, I understand that Moose Pass is designated as a HUB zone where economic dollars count more than other areas such as Anchorage.

References backing the objection

**36 CFR 219.21 Social and Economic Suitability:** states "responsible official involves interested and affected people in planning for National Forest System lands, provides for the development and consideration of relevant social and economic information and analyses..." It also states that "the responsible must develop or supplement the information and analyses related to the following: 1) Describe and analyze, as other economic trends;...2) Analyze community or region risk and vulnerability..."

Note: These were described in general for the south central portion of Alaska and it applies to summer months (5 mo.) but there was no mention of the winter local economy and how difficult it is for businesses to stay open during this time of year. Therefore the analysis is not complete and the economic effects section can not be completed until this information is known. Therefore this regulation was not abided by.

**EIS 3-518:** "For many Alaskans, proximity and access to natural environments and the various activities these environments support is a major amenity and fundamental reason for their choice to live where they do. This becomes another important way in which the Chugach National Forest can contribute to local economies within the planning area."

**EIS 3-525:** "Moreover, one of the major themes of the Revised Forest Plan is the allocation and management of recreational opportunities. Consequently it is in this area that the plan may have its most important economic impacts."

**EIS 3-527:** "It is clear however, that recreation and tourism does contribute substantially to the economy surrounding the Chugach National Forest. A number of studies have estimated the magnitude of this contribution..."

Note: These studies, however, do not include anything about winter recreation. How did the planning team know what impact closing major snow machine areas would have on the local economies within and near the forest if there were no studies on it?

**EIS 3-528:** "Each of the above studies indicates that considerable income is generated by recreation activities linked to the Chugach National Forest. In many cases, however, it is important to remember that recreationists may be able to substitute with non-National Forest System lands should their access to the Forest be somehow constrained. Thus a change in recreation opportunities on the Chugach National Forest may not directly lead to economic impacts in the area around the Forest."

Note: This statement does not at all address what happens to local businesses when the recreationists go elsewhere. It also uses an awful big **may** in reference to economic impact. It is a known fact and well-studied in Yellowstone National Park that snow machining boosts the local economies but the non-motorized clientele do not contribute much.

**EIS 3-543:** "In order to estimate employment impacts associated with recreation several elements are necessary to conduct a reasonable and meaningful analysis:"

Note: This section goes on to list all the elements such as local economy, existing use data, expenditures, etc., then a surprising conclusion is reached. "Since none of these elements were adequately met for the recreation and tourism activities presently taking place on the Forest, no impact analysis is quantified."

Note: Does it make sense to make broad sweeping changes in recreation use (i.e. Closure of the subject areas for winter snow machine use) without at least some data and analysis?

Item 2-All areas listed above for closure-

**EIS 3-539:** From the "Planning for the Future of the Chugach National Forest" and the "Your Community's Quality of Life" Surveys. Under Forest Resource use and management - "The lowest average satisfaction ratings are for: access for disabled people and ATV/ORV (OHV) areas."

**EIS 3-540:** From the "Planning for the Future of the Chugach National Forest" and the "Your Community's Quality of Life" Surveys. Under Forest Access - "The self-assessed overall average quality of life and community resiliency rankings (from highest to lowest) by community for the Forest Communities of interest are:" Moose Pass is ranked third highest.

Note: With winter lasting over 5 months, and most of the residents owning snow machines, the quality of life will surely decline with limited areas to recreate in, especially those affected groups listed above.

#### Conclusions and comments

The economic analysis does not reflect any economic data or analysis of how snow machine closures will impact local businesses during the winter months.

Input by local governments (KPB, Soldotna, and Seward) was largely ignored.

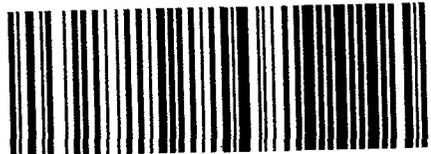
Area businesses were not contacted about potential snow machine closures (Trail Lake Lodge, Summit Lake Lodge, and local bed & breakfasts).

Snow machine closures will cumulatively impact the reduction of the local economy (end of the Usibelli coal contract, railroad workers layoff, decreasing stock market, and United States at war)

The economic effects section starting on page 3-545 of the EIS only shows a "qualitative" analysis of the effects of each alternative. What is clearly lacking is any real content of this analysis. In each alternative, only one sentence addresses the motorized vs. non-motorized winter recreation economic effect, and this sentence is nearly identical for each. I find no recognition of the probable economic impact to our local businesses should this massive closure occur.

Jeff Estes  
P.O. Box 173  
Moose Pass, Alaska 99631

**CERTIFIED MAIL**



7000 0520 0014 9604 9090

Return Receipt Requested  
Showing Address  
Where Delivered

Regional Forester  
USDA Forest Service, Alaska Region  
P. O. Box 21628  
Juneau, Alaska 99801-1628

**RECEIVED**  
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