

**Chugach National Forest**  
**Proposed Revised Land Management Plan**  
**Scoping Report, August 2016**



Woolly Lousewort (*Pedicularis lanata*) blooms above Crater Lake, Chugach National Forest

Photo Credit: Tanya Zastrow

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**Scoping Report, August 2016**

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## Introduction

This report summarizes the issues and concerns expressed by Alaska Native Tribes and Corporations, the State of Alaska, individuals, local businesses and organizations during a 60-day comment period (December 18, 2015 through February 19, 2016). Comments were requested by the Forest Service in response to the release of proposed content for a Chugach National Forest Revised Land Management Plan (forest plan).

This report contains six sections. The introductory section provides background information about revising the forest plan, the scoping process and associated events, and an explanation of the comment review process. The second and third sections summarize the concerns raised by Alaska Native Tribes and Corporations and the State of Alaska respectively – these groups have a cooperative relationship with the Forest Service for the purpose of revising the forest plan. The fourth section captures the concerns about the proposed plan from individuals, local businesses and organizations collectively referred to as the “public” for the remainder of this report. The fifth section lists concerns about the plan revision process and complying with requirements of the National Environmental Policy Act (NEPA). The last section of this report provides a list of the significant issues that were identified during the scoping period.

## Background (Revising the Forest Plan)

Current efforts (2012 to present) to revise the forest plan follow two previous planning efforts for the Chugach National Forest that resulted in approved forest plans in 1984 and 2002. The [2002 forest plan](#) provided updated management direction based on laws and policies, resource supply potentials and projections of demand, the results of monitoring and evaluation, and the identification of public issues and management concerns. The 2002 forest plan has been amended five times in response to changed conditions and new information. While much of the 2002 forest plan as amended remains relevant, public comments and updated information from the assessment phase of forest plan revision (from 2012 to 2014) revealed aspects that need to change. Revisions to the 2002 forest plan will help the Forest Service manage and protect natural and cultural resources in anticipation of a changing climate as well as identify expected changes in uses and benefits that would be derived from the national forest during the next 15 to 20 years.

There are two agency regulations that have changed since the 2002 forest plan was approved that influence the current forest plan revision process. A new National Forest System planning rule was approved in 2012, with final directives for agency implementation released in January 2015. The [2002 Planning Rule](#) is the most significant update of Forest Service land management planning regulations in 30 years. The new planning rule and directives are designed to provide the framework and tools for completing forest plan revisions or amendments with an emphasis on public collaboration and use of best available science. The other regulatory change since 2002 was the establishment of the [2005 Travel Management Rule](#), which requires each national forest and grassland to identify and designate roads, trails, and areas that are open (and closed) to motor vehicle use. Agency directives for implementing the 2005 Travel Management Rule include guidance to separate site-specific travel management decisions from existing strategic guidance documents like forest plans. The site-specific decisions for motor vehicle use that are currently found in the 2002 forest plan will not be included in the revised forest plan.

The [need to revise](#) the current 2002 forest plan is based on: 1) Forest Service policy to revise forest plans at least every 15 years; 2) new requirements from the two rules described above; 3) concerns raised during public engagement activities; and 4) changes in economic, social, and ecological conditions and trends and new information from monitoring and scientific research as described in the 2014 *Assessment of Ecological and Socio-Economic Conditions and Trends* for the Chugach National Forest.

In general terms, the need to change includes addressing questions about how the Forest Service will manage for ecological integrity, terrestrial species and habitats, riparian areas, water quality, aquatic species and habitat, rare species (including threatened, endangered, and candidate species and species of conservation concern), wood products, scenery, recreation opportunities, areas to be evaluated for possible wilderness recommendations, roads and trails, minerals, wildfire, lands, air quality, special uses and the contributions of the Chugach National Forest to local economies. A number of concerns also involve impacts to the Chugach National Forest from outside the national forest boundary. These concerns include climate change, invasive species, and continual demands for use and access.

## Public Scoping (Process and Events)

Early engagement with the public about the upcoming forest plan revision process started in March 2012. The public and stakeholders were informed through press releases, letters, Web-based information, and 10 community workshops lead by the Forest Service and the University of Alaska Anchorage (UAA) in the spring of 2012. Additionally, an online participatory mapping interface (*Talking Points*) was available for the public to use from April to November 2012 to identify areas and activities of interest.

On January 31, 2013, the Forest Service issued a news release announcing the beginning of the first phase of the planning process. On February 7, 2013, a legal notice was published in the Anchorage Daily News announcing the beginning of the assessment phase of plan revision and upcoming opportunities for public engagement. Eighteen additional public meetings and workshops were held in local communities in 2013. In addition to these efforts, a series of targeted outreach efforts to federally recognized Alaska Native Tribes and Corporations, youth, new audiences, permittees, and neighboring landowners, including the State of Alaska, were conducted to capture stakeholder input for the assessment.

The planning team integrated input from Alaska Native Tribes and Corporations, the State of Alaska, the public and Forest Service employees to compile the best available information about current Chugach National Forest conditions, emerging trends, and issues. This resulted in the publication of the report, *Assessment of Ecological and Socio-Economic Conditions and Trends* (assessment) in November 2014. We notified the public about the availability of the assessment via the Chugach National Forest Website, the plan revision mailing list, and news release. Few public comments were received.

During 2014, the planning team began several tasks required by the 2012 Planning Rule. This included reviews of 2002 forest plan content to identify preliminary need to change themes, changed conditions of eligible wild and scenic rivers, and inventory and evaluation of potential wilderness areas. In spring 2015, nine open house meetings accompanied a 60-day public comment period following the publication of these documents: *Preliminary Need to Change Report*; *Draft Wilderness Inventory and Evaluation Report*; *Wild, Scenic and Recreational Rivers Evaluation Report*; and a spring 2015 plan revision newsletter. Twenty written responses from groups and individuals were received and then considered in the development of proposed plan content.

The [notice of intent \(NOI\) to prepare an environmental impact statement](#) was published in the Federal Register on December 18, 2015. The NOI asked for public comment on the proposed action (to revise the 2002 forest plan and to disclose effects in an environmental impact statement) during a scoping period from December 18, 2015 to February 19, 2016. The public was informed about the NOI, proposed action, and comment period via the Chugach National Forest Website, plan revision mailing list alerts, press releases, legal notices in the newspapers of record (*Alaska Dispatch News* and *The Cordova Times*), and messages shared on Twitter and Facebook.



The public was encouraged to provide written comments in person, by U.S. Postal Service, via email, or by using the Forest Service Web portal known as the Comment Analysis and Response Application (CARA).

The 60-day scoping period generated 1,462 responses. Of the responses, 920 (63 percent) were unique, while the remainder were submitted as variations of 20 master form letters. Alaska and California residents provided the most comments. There was at least one response from individuals residing in 47 of the lower 48 states and the District of Columbia. Individuals, 14 area businesses, and 24 local and national organizations responded. Local governments, state and federal agencies and Alaska Native corporations also responded.

## Comment Review Process

All of the scoping comments were reviewed to identify issues and frame their associated cause-and-effect relationships. The issues were separated into two groups: significant and nonsignificant. Significant issues are those used to develop alternatives and/or modify the proposed action. Nonsignificant issues are identified as those: (1) outside the scope of the proposed action; (2) already addressed by law, regulation, the proposed revised plan, or other higher level decision; (3) irrelevant to the decision to be made; or (4) conjectural and not supported by scientific or factual evidence.

The comment review process included these steps:

- All 1,462 responses were assigned a unique tracking number.
- Each response was reviewed.
- Substantive comments from each response were identified and coded.
- Similar comments were then grouped together.
- For each group of similar comments a concern statement was developed.

Concern statements were developed to capture the thought, idea, or issue common to their associated comments. They most often represent the view of many respondents, but may also be derived from just one person's input. Concern statements are used by the planning team in identifying potential modifications to the proposed action and the issues to be considered in subsequent stages of the planning process.

Below is an example of a concern statement and associated comments that were grouped together to develop it:

**Concern Statement:** *The Forest Service should include mining as an activity in the table of general suitability determinations for management areas and should provide clear and consistent explanations of intent regarding minerals management.*

- **Comment:** *Mining is an important multiple use of the forest, which the plan acknowledges, yet it is omitted from Table 6 in general suitability determinations for land uses within management areas. In the revised plan's description of management areas (pages 44-57), minerals management is included in guidelines for Management Areas 3, 4, 5, and 7, but not in Management Areas 1, 2, and 8. Where mining is referenced in the Management Areas section, it is usually in the form of guidelines, which lean heavily toward restrictions that are generally not consistent with the goal for minerals on page 23.*
- **Comment:** *There is a goal (page 23, Minerals FW-G2-DC-16) that recognizes that mining is an important use of the Forest, yet mining is omitted from Table 6 that describes general suitability determinations for land uses within management areas. In the description of management areas on pages 44-57, minerals management is included in guidelines for Management Areas 3, 4, 5*

*and 7, but not in Management Areas 1, 2, or 8. Where mentioned in management area descriptions, the guidelines are restrictions that are generally not consistent with the goal for minerals on page 23. Overall, the proposed revised management plan provides incomplete and inconsistent direction on mining and minerals management in the Forest. The plan needs to provide clear and consistent explanations as to the plans intent regarding minerals management.*

## Alaska Native Tribes and Corporations Concerns

This section identifies concerns expressed by Alaska Native Tribes and Corporations through representatives from Cook Inlet Region, Incorporated (CIRI) and Chugach Alaska Corporation (CAC) about revising the forest plan for the Chugach National Forest.

- The Forest Service should actively manage the national forest to provide for forest health and to re-introduce an allowable sale quantity (ASQ) to help meet local demand for timber.
- The revised forest plan should include more emphasis on the significance of mining in the plan area from a cultural and economic perspective. No areas should be withdrawn from mineral entry unless statutorily closed to mining by ANILCA.
- The Forest Service should not make any wilderness area recommendation in or around the Kenai-Russian Rivers Complex as they could have an adverse impact on plans for development of, and access to, the joint visitor's center and archeological research center envisioned in the RRLA and the 14(h)(1) Selection Agreement signed in 2001.
- The Forest Service should work with CIRI and other native and community groups to connect people with nature across the national forest and to implement the visitor use tool (objectives FW-OB-7 and FW-OB-14).
- The Forest Service should modify or clarify subsistence activities described in desired condition FW-G2-DC-18 to be consistent with ANILCA title VIII.
- The revised forest plan should acknowledge that there are parcels of state and private land within the national forest boundary, including parcels where the state and Alaska Native Corporations hold a property interest (surface and/or subsurface rights) and/or easements.
- The revised forest plan should address land ownership and access rights by other large property inholders including village corporations and set net fishermen.
- The Forest Service should acknowledge that access to surface and subsurface resources are guaranteed rights under ANCSA, ANILCA, and the Alaska Statehood Act.
- The Forest Service should acknowledge that CAC, under the 1982 CNI Settlement Agreement, has the right to cross federal land to the Bering River coal fields under specifically defined conditions and procedures, including the right to use timber and common varieties of mineral materials in connection with construction and maintenance of access routes and associated facilities. As a contract, the CNI Settlement Agreement implies certain other access rights. The revised forest plan should include a desired condition and objective assuring that CAC's land ownership and access rights are honored.
- The Forest Service should acknowledge that the visual impact of logging and mining can adversely impact wilderness vistas and decrease tourism value. Clarification is needed in the revised forest plan for meeting scenic integrity objectives during post mining reclamation.
- The Forest Service should explain how the revised forest plan is different from the 2002 forest plan.

- The revised forest plan should disclose how conflicts between plan components and resulting management actions will be resolved, i.e., how these will be prioritized.
- The Forest Service should make economic sustainability the first priority of the revised forest plan.
- The revised forest plan should include a guide that cross references desired conditions to related plan components.
- The Forest Service should initiate revised forest plan consultation with affected Alaska Native Tribes and Corporations, including CAC.
- The revised forest plan should state its term and its effect after the term expires.
- The Forest Service should better explain management restrictions for inventoried roadless areas or eliminate the special area and incorporate Roadless Rule restrictions into management area management direction.
- The revised forest plan should remove any concept of acquiring more land from CAC, or should limit the concept to a general statement as part of a desired condition.
- The Forest Service should terminate the Nellie Juan-College Fjord Wilderness Study Area.

## State of Alaska Concerns

This section identifies substantive concerns expressed by the State of Alaska through representatives from the Department of Natural Resources (DNR) and the Department of Fish and Game (ADF&G) about revising the forest plan for the Chugach National Forest.

- Working cooperatively with Department of Natural Resources (DNR), the Forest Service should give the following elements more emphasis in the revised forest plan:
  - Recreation opportunities: motorized and non-motorized use and access to popular recreation opportunities - especially to areas accessible along the existing road system
  - Recognition of all trails and right-of-ways in the planning area, opportunities for new trails, and opportunities for upgrades to existing trails
  - Recognition of existing valid mining claims, approved mining activities, and legal access routes to valid mining claims, and discussion concerning how they are considered during wilderness and wild and scenic river assessments
  - Evaluation of the direct and indirect effects that management decisions will have on access to and development of locatable, leasable, and salable mineral deposits, and renewable energy resources
  - More emphasis on the significance of mining in the planning area from a cultural and economic perspective
  - Enhanced cooperative management of coastal lands under the spirit of the memorandum of agreement between the USFS and DNR
  - An allowable cut for forest management activities including restoration work for both forest health (beetle kill) and hazard fuel mitigation for wildland fire risk in the CNF.
  - Allowing for salvage timber harvest for timber damaged by wildfire, beetle-kill, etc.
- The revised forest plan should identify all of the working agreements between the Forest Service and the DNR.
- The Forest Service should accept help from Alaska DNR to address a number of important challenges described in the Social and Cultural Systems section of the proposed action.
- The Forest Service should reference and consider state park and other area management plans when developing and analyzing alternatives during the forest plan revision process.

- The revised forest plan should acknowledge that there are parcels of state and private land within the national forest boundary, including parcels where the state and Alaska Native Corporations hold a property interest and/or easements.
- The Forest Service should acknowledge ADF&G's management responsibilities and authorities for fish and wildlife populations within the Chugach National Forest, including those limited exceptions where Congress has expressly provided that responsibility to the Federal government.
- The Forest Service should note that the agency will work within the state system with regard to water issues (e.g., FW-G1-DC-03 and FW-G1-DC-04).
- The Forest Service should consider state land management goals when administering the special uses program as it relates to standard FW-G2-ST-09.
- The Forest Service should clarify minerals guideline MA 3-GL-03 as to what is required during mining reclamation activities.
- The revised forest plan should include maps that indicate where on the national forest snow machine access is allowed under ANILCA provisions.
- The Forest Service should modify the wilderness study area management language to provide strong protection of wilderness character and to meet the spirit and intent of the 1964 Wilderness Act while recognizing and allowing for specific exceptions authorized by ANILCA.
- The Forest Service should clarify ANILCA definitions and related forest plan direction for the wilderness study area (MA 1) and the wild and scenic river (MA 2) management areas, including wildlife habitat projects, soil/watershed projects, fish habitat projects, personal use timber harvest, recreation cabin use, traditional activities, and access.
- The revised forest plan should include references to other applicable laws, regulations and policies governing land and resource management decisions on the Chugach National Forest.
- The revised forest plan should reference ANILCA titles V, VIII, XI and XIII when providing direction related to access and use (public and administrative), management authorities, and subsistence use.
- The Forest Service should not develop any alternatives which would recommend new Wilderness or new Wild and Scenic River designations.

## Public Concerns about the Proposed Plan

This section captures the substantive concerns raised by individuals, non-profit groups, environmental organizations, businesses, and municipal governments about revising the forest plan. These concerns along with those raised by Alaska Native Tribes and Corporations and the State of Alaska in the sections above will be considered when modifying the proposed plan. The list is organized alphabetically by concern topic. Each concern statement represents from one to many comments.

### Aquatic Ecosystems and Riparian Habitat

- The Forest Service should further develop objectives and monitoring questions to address integrity for key coastal and other wetland ecosystems.
- The revised forest plan should include standards or guidelines that prohibit management practices that would seriously and adversely affect water conditions or fish habitat (219.8(b)(3)(ii)(B)) and ensure implementation of best management practices for water quality (219.8(b)(4)).

- The revised forest plan should incorporate the specific reference from the Aquatic Ecosystem Management Handbook at standard FW-G1-ST-04. Standard FW-G1-ST-02 states that Best Management Activities shall be applied without articulating what those activities are.
- The revised forest plan should define the areas recognized as the riparian management zone subject to standard FW-G1-ST-03 to avoid the need for an amendment in reference to site specific delineations (219.8(a)(3)(ii)(A)).

#### Climate Change

- The Forest Service should conserve intact ecosystems to provide resilience in response to climate change. Also, the revised forest plan should define resilience and state how it will be measured (via key characteristics).

#### Cultural Resources

- The Forest Service should consider including Ice Patch Archeology as part of desired condition FW-G2-DC-02.

#### Ecosystem Integrity

- The Forest Service should describe forest types that are classified as target ecosystems for ecological integrity and desired conditions and other plan components to maintain or restore key ecosystem characteristics (e.g., patch size and configuration, age and size class diversity, etc.)
- The revised forest plan should describe how the desired conditions apply to ecosystem integrity. The revised forest plan needs to be clear on what the target ecosystems and their characteristics are for planning, because the planning rule requires that integrity be provided for individual ecosystems by estimating desired ranges for key characteristics. For each targeted ecosystem, it is critical to develop desired conditions for one or more key ecosystem characteristics in each of the categories of dominant conditions for ecological integrity (composition, structure, function, and connectivity). Plan components should specify the desired levels for each key characteristic. Specific ecosystems should be identified, including for various important terrestrial vegetation types, wetlands, coastal marine areas, freshwater/streams, and others as guided by the assessment. Desired conditions for terrestrial ecosystem integrity could be subdivided into forest and shrubland ecosystems, with desired key characteristics for structure, function, composition, and connectivity for each specified ecosystem. Measurable desired conditions could be developed for aquatic ecosystem integrity, with subdivisions for wetlands, streams, etc., as outlined in the assessment. This would provide a more coherent picture of how the revised forest plan will provide for ecological integrity.
- The revised forest plan should include direction for the maintenance of intact ecosystems and ecosystem resiliency and integrity. For desired condition FW-G1-DC-07, stream channel morphology, structure, complexity and diversity need to have desired measurable ranges affiliated with natural range of variability (NRV). For desired condition FW-G1-DC-12, the plan component should describe the desired connectivity patterns and be spatially explicit to the degree feasible. There should also be connectivity desired conditions for aquatic ecosystem types. For desired condition FW-G1-DC-13, include desired conditions descriptions for the various types of disturbances that are characteristics of the terrestrial ecosystems.

- The revised forest plan should be more specific about connectivity as a key wildlife characteristic. For desired condition FW-G1-DC-14, statements should be developed for specific forest types that present the desired natural ranges for key wildland fire characteristics. For desired condition FW-G1-DC-18, composition, distribution, genetic diversity, abundance, and reproductive resilience are key characteristics that could be developed into measurable desired condition statements.
- The revised forest plan should demonstrate that proposed Forest Service actions are in fact consistent with ecosystem integrity and should clearly define ecosystem integrity. The revised forest plan should have measurable desired conditions and other plan components to guide subsequent implementation specifically in reference to ecosystem integrity. The revised forest plan should clarify language that links plan direction for particular management areas with direction for ecological integrity for ecosystems outside of management areas.
- The revised forest plan should include measurable direction for ecosystem integrity, otherwise the impacts to ecosystem integrity cannot be determined during actions, such as non-renewable energy exploration. (e.g., FW-G2-DC-15 and FW-G2-DC-10).
- The revised forest plan should describe the relationship between focal species and plan components to ensure ecosystem integrity.

#### Fire Management

- The revised forest plan should include wildfire protection desired conditions/objectives for communities and wildland urban interface areas. This is critical, especially if they are outside of NRV for ecosystems and may not be consistent with ecological conditions at the landscape scale.
- The revised forest plan should include more detail on how the Forest Service will collaboratively manage the landscape for wildfire and ecosystems. The Forest Service's responsibilities under the Alaska Interagency Wildland Fire Management Plan should be included in the revised forest plan. The relationship between landscape-scale management option areas (guideline FW-G2-GL-11), the actions to be taken within them, and the rest of plan direction should be clarified.

#### Human Bear Interactions

- The Forest Service should revise or remove guideline FW-G2-GL-05, which states that new Forest Service cabins should not be constructed in bear habitat. The entire Chugach National Forest is bear habitat.

#### Interpretation and Education

- The revised forest plan should include objectives to increase education and outreach for purposes of protecting the natural resources of the area, especially in Prince William Sound.

#### Invasive Species

- The Forest Service should modify guideline FW-G1-GL-16 to require the use of weed free seed when revegetating and to leave wildlife corridors, snags, and buffers.

#### Management Areas

- **Wilderness Study Area (MA 1):** The Forest Service should modify the wilderness study area management language to provide strong protection of wilderness character and to meet the spirit and intent of the 1964 Wilderness Act while recognizing and allowing for specific exceptions authorized by ANILCA.

- **Wilderness Study Area (MA 1):** The Forest Service should clarify the management policy within the wilderness study area for all land-based motorized uses such as chainsaws, helicopters, and drones.
- **Wilderness Study Area (MA 1):** The Forest Service should place restrictions on activities that impact the wilderness study area, such as prohibiting chain saw use and eliminating semi-permanent camps that have been set up there by float planes users. Fuel supply stations should be prohibited.
- **Wilderness Study Area (MA 1):** The Forest Service should prohibit mountain bikes from the wilderness study area because they shrink wilderness values due to their mechanical advantage.
- **Wilderness Study Area (MA 1):** The Forest Service should manage the entire wilderness study area to maintain wilderness characteristics and should clarify rules for personal timber harvest and motorized uses, including chainsaws, OHVs, and helicopters.
- **Wilderness Study Area (MA 1):** The revised forest plan should require the Forest Service to demonstrate a strong need and benefit for any wildlife or fish habitat projects in the wilderness study area. Commercial access to the wilderness study area should not be expanded. The Forest Service should explore options to reduce ongoing erosion of wilderness character in the wilderness study area.
- **Wilderness Study Area (MA 1):** The Forest Service should clarify ANILCA definitions and related forest plan direction for the wilderness study area, including wildlife habitat projects, soil/watershed projects, fish habitat projects, personal use timber harvest, recreation cabin use, traditional activities, and access.
- **Wild, Scenic, and Recreation River Areas (MA 2):** The Forest Service should modify plan components for the wild and scenic river management area, including suitable uses and activities, to lessen impacts and disturbances to the outstandingly remarkable values of the river segments.
- **Research Natural Areas (MA 3):** The Forest Service should justify why specific RNAs may need to be withdrawn from mineral entry.
- **Exxon Valdez Oil Spill Acquired Lands (MA 6):** The Forest Service should expand desired condition MA 6 DC-04 to discuss in greater detail EVOS restoration plan goals and land acquisition.
- **Exxon Valdez Oil Spill Acquired Lands (MA 6):** The revised forest plan should include plan components that are consistent with the *1994 Exxon Valdez Oil Spill Restoration Plan*. These should address managing for conservation and wilderness purposes; curtailing enhancement projects; protecting populations, habitats, and the ecosystem in the region; protecting as much as possible for current and future generations by providing for multiple and sustainable use of the region. The residual risk of major oil spills should be addressed by protecting the resilience of the ecosystem to aid its recovery from future oil spill disasters. The revised forest plan should clarify the overall protective intent for managing EVOS lands.
- **Front Country (MA 8):** The Forest Service should shrink MA 8 Front Country boundaries to reduce opportunities for development. Management area corridors may be too broad. Reducing road corridors and increasing the area for MA 4 Backcountry should be considered.
- **Multiple MAs:** The Forest Service should prohibit mountain bikes from inventoried roadless areas because of their mechanical advantage.

## Minerals

- The Forest Service should revise minerals guideline MA 3-GL-03 to exclude Kenai Lake-Black Mountain (5,850 acres), Wolverine Glacier (6,861 acres), and Olsen Creek (6,821) to comply with ANILCA 1326(a).
- The revised forest plan should include more emphasis on the significance of mining in the plan area from a cultural and economic perspective.
- The Forest Service should include mining as an activity in the table of general suitability determinations for management areas and should provide clear and consistent explanations of intent regarding minerals management.

## Monitoring

- The Forest Service should develop more clearly defined monitoring questions to address: adaptive management, fish and aquatic ecosystem integration, ecosystem resiliency, and integrity.
- The Forest Service should monitor heli-ski activities to prevent negative impacts to sheep, goats, and eagles.

## Multiple Uses

- The Forest Service should prohibit the use of drones within the Chugach National Forest.

## Outfitter and Guide Services

- The Forest Service should clarify the definition of outfitter-guide assigned sites as it is associated with the suitability table (p. 43). It is unclear from the current definition whether or not these sites are exclusive for outfitters and guides or also available for general public use.

## Partnerships

- The Forest Service should recognize the role of non-profit organizations to provide trails, cabins, campgrounds, educational programming, etc. This could be added to the Sustainable Recreation Opportunities desired conditions section of the revised forest plan and should be integrated into the Partnerships and Collaborations objective.

## Plan Objectives

- The revised forest plan should include energy objectives. Consider at least one collaboration objective to determine a high value, low cost renewable energy project within the national forest to reduce or eliminate fossil fuel generation adjacent to the national forest. Add at least one educational collaboration objective to assess the renewable and non-renewable energy opportunities of the national forest and the positive and negative impacts of realizing such opportunities.
- The Forest Service should develop robust objectives (more than five needed for ecological sustainability) to ensure effective implementation. Objective FW-OB-02 should be associated with a clearly measurable desired condition statement based on NRV to maintain ecosystem integrity. Objective FW-OB-05 needs specific information on desired conditions/habitat. The plan needs to be more specific as to how hazardous fuel reduction projects meet the desired conditions.



### Property Rights

- The revised forest plan should acknowledge that there are parcels of state and private land within the national forest boundary, including parcels where the state and Alaska Native Corporations hold a property interest and/or easements.

### Recreation Opportunity Spectrum

- The revised forest plan should include goals and desired conditions that emphasize natural quiet in some areas.
- The Forest Service should consider revising table 3 (applicable social ROS class characteristics) in the revised forest plan. The “Level of encounters/solitude on shorelines” criteria is dependent on the location and size of beaches and there is not a one size fits all requirement. These classifications are unrelated to actual experience. Maximum party size for primitive and semi-primitive non-motorized classes are too high. To limit impacts to the environment and the social experience, a special use permit should be required for groups larger than eight. Maximum party sizes are generally too large and should be halved.

### Scenery Management

- The Forest Service should acknowledge that the visual impact of logging and mining can adversely impact wilderness vistas and decrease tourism value. Clarification is needed in the revised forest plan for meeting scenic integrity objectives during post mining reclamation.

### Species Diversity

- The Forest Service should modify desired condition FW-G1-DC-19 to identify the federally listed and at risk species as well as their current conservation status and desired future habitat conditions.
- The revised forest plan should include the guideline from the 2002 Forest Plan that addresses Forest Service activities around federally listed species (e.g., stellar sea lion) or should include similar direction.
- The Forest Service should designate additional species for Species of Conservation Concern.
- The revised forest plan should provide more clarity on desired species diversity and associated habitat features across all plan components (desired conditions, objectives, and standards and guidelines). The proposed action currently lacks specific desired conditions and habitat features across the landscape, including wildlife movement corridors to help maintain genetic diversity of wildlife populations. More emphasis should be given to habitat protection.
- The revised forest plan should include plan components that specify the necessary ecological conditions and objectives for dusky Canada goose population resiliency, adaptability, and persistence.

### Subsistence

- The Forest Service should modify or clarify subsistence activities described in desired condition FW-G2-DC-18 to be consistent with ANILCA title VIII.

### Watershed Integrity

- The Forest Service should modify watershed desired conditions FW-G1-DC-05 and FW-G1-DC-06 to better describe a core set of watershed attributes, indicators, and performance thresholds for

maintaining ecosystem integrity. As a source of best available scientific information, the USDA Watershed Condition Classification Technical Guide 2011 (FS-978) provides examples.

- The Forest Service should note that the agency will work within the state system with regard to water issues (e.g., FW-G1-DC-03 and FW-G1-DC-04).
- The revised forest plan should identify the national forest's priority watersheds (by name).

#### Wood Harvest

- The revised forest plan should include plan components for the removal of merchantable biomass (slash, pre-commercial thinning, non-merchantable trees, etc.) provided that this removal does not harm the soil layer.
- The Forest Service should require timber sale projects to include the yarding of unmerchantable material to landings to make it accessible for firewood and biomass removal.

### Public Concerns about the Planning/NEPA Process

Several of the comments shared were concerns of a procedural nature and are listed below. These will be addressed within the NEPA compliance process or may be included as management approaches for implementing the revised forest plan.

#### Communications

- The Forest Service needs to disclose their responses to the comments submitted by the public since 2013.
- The Forest Service should present changes to the proposed action in contrast with the scoping period version to help readers understand the proposed action.

#### Environmental Effects Analysis

- The Forest Service should develop and analyze plan components designed to minimize negative impacts to aquatic ecosystems.
- The Forest Service should reference and consider state park and other area management plans when developing and analyzing alternatives during the forest plan revision process.
- The Forest Service should consider the effects to other resources if helicopter access by outfitters/guides is limited in some areas. For example, if clients are dropped off farther from a glacier, more trails will be necessary to provide access to the glacier.
- The Forest Service should describe current habitat, connectivity, and management strategies along with the impact the revised forest plan would have on these features.
- The Forest Service should investigate the relationship between management activities, climate change impacts, and habitat resiliency.
- The Forest Service should disclose the effects of roads and trails to aquatic and terrestrial resources, including changes to hydrology; road-stream crossings; road surface erosion; culvert sizing and potential for washout; fish passage and stream channel integrity; seasonal and spawning habitats; large woody debris recruitment; wildfire risk from recreation; noxious weeds; and riparian and wetland habitat effects.
- The Forest Service should assess the existing natural soundscape and evaluate the effects from the different alternatives. Human caused noise within the national forest should be reduced to lessen disruption of natural habitats.

- The Forest Service should anticipate changing conditions associated with climate change and the effects those conditions would have on recreation. For example, closure dates should be flexible to account for weather variability, and non-motorized trails may need to be constructed to provide access through areas that are newly infested with thick brush.
- The Forest Service should identify the pros and cons of management decisions for recommended wilderness areas so that recreation opportunities are not restricted.

#### Multiple Use Management

- The Forest Service should assess the conflict created between ecologically important protected areas and resource development interests.

### Significant Issues (Basis for Alternative Development)

This section lists the issues raised during the scoping process that are in conflict with the proposed plan. In other words these issues are different from what is currently proposed. This list of significant issues will be considered when developing alternatives to the proposed plan.

#### Recreation Opportunity Spectrum

- The Forest Service should keep the Center Creek and Divide Creek areas open to heli-ski operations and not designate them as non-motorized areas.
- The Forest Service should assign the primitive ROS class to Prince William Sound instead of semi-primitive non-motorized.
- The Forest Service should develop a winter ROS setting for the revised forest plan. The expectations, experiences, and desires of national forest visitors are very different in winter than in summer, and the ROS setting should reflect this. This ROS setting should protect both motor vehicle and non-motorized winter recreation opportunities.
- The Forest Service should designate the entire wilderness study area ROS primitive in order to protect wilderness character. Anomalies can be referenced on the ROS map as allowable under the provisions of ANILCA.
- The Forest Service should not allow helicopters to provide hut-to-hut access.
- The Forest Service should consider designing future trails for multiple non-motorized uses (e.g., bike, ski, and hike).
- The Forest Service should maintain or increase opportunities for non-motorized use of the national forest, especially on the Kenai Peninsula.

#### Scenery Management

- The Forest Service should establish a very high Scenic Integrity Objective for the Prince William Sound area and potentially for other backcountry areas.

#### Timber Production

- The Forest Service should actively manage the national forest to provide for forest health and to re-introduce an allowable sale quantity (ASQ) to help meet local demand for timber.

#### Wilderness Recommendations

- The Forest Service should recommend wilderness area designation for parts of the Kenai Peninsula geographic area.

- The Forest Service should recommend the entire wilderness study area to Congress for wilderness designation.
- The Forest Service should consider the following areas for wilderness area designation: Gulch Creek/Alpenglow complex, Snow River, greater Paradise Lakes Valley watershed, Green, Montague, Evans, Hawkins and Hinchinbrook Islands.
- The Forest Service should not recommend any areas to be included in the National Wilderness Preservation System.
- The Forest Service should not make any wilderness area recommendation in or around the Kenai-Russian Rivers Complex as they could have an adverse impact on plans for development of, and access to, the joint visitor's center and archeological research center envisioned in the RRLA and the 14(h)(1) Selection Agreement signed in 2001.
- The Forest Service should not make any wilderness area recommendations within the Kenai Peninsula geographic area.

## Concurrence Statement

I acknowledge the concerns raised during the scoping period by Alaska Native Tribes and Corporations, the State of Alaska, and the public as described in this report.

I direct the interdisciplinary team to address the procedural concerns and the list of significant issues during the NEPA process, and, as appropriate, in the modification of the proposed plan and/or formulation of alternatives to the proposed plan. Should further analysis determine that an issue needs to be adjusted or refined, the interdisciplinary team may do so with my review and approval.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

8/30/2016

*Terri Marceron  
Forest Supervisor  
Chugach National Forest*