

Chapter 6 - Public Participation and Comment on the DEIS and Proposed Revised Forest Plan

The Forest Service has documented, analyzed, and responded to the public comments received on the Draft Environmental Impact Statement (DEIS) and the Proposed Revised Chugach National Forest Land and Resource Management Plan (Proposed Revised Forest Plan). Appendix K describes the substantive comments received on the DEIS and the Proposed Revised Forest Plan. It also contains the Forest Service responses to those comments. In addition, Appendix K contains copies of all letters received from federal, state, city, borough and tribal governments, as well as elected officials. This response complies with section 40 CFR 1503.4 of the National Environmental Policy Act regulations, Response to Comments.

Public Participation on the DEIS and Proposed Revised Forest Plan

Public Comment Period

The DEIS and the Proposed Revised Forest Plan were released for public review and comment on September 15, 2000. A CD-ROM copy of the documents was also made available. Over 400 copies of the documents, 600 copies of the CD-ROM, and 200 document summaries were distributed to interested parties. The 90-day comment period ended December 14, 2000. Over 33,000 cards, letters, and e-mail responses on the DEIS and Proposed Revised Forest Plan were received. Of these, over 27,000 were form letters. There were 38 different kinds of form letters. Three responses came from federal agencies, three from state governments, three from borough governments, three from city governments, and two from tribal governments having sovereign status. All comments were included in a computerized DEIS/Proposed Revised Forest Plan database.

The Chugach National Forest hosted a series of Open House meetings during the public comment period to discuss the DEIS and Proposed Revised Forest Plan. Open House meetings were conducted in Whittier, Moose Pass, Girdwood, Cordova, Anchorage, Valdez, Cooper Landing, Hope, and Soldotna. The purpose of the meetings was to help the public learn more about the documents, maps and other tools such as the compact disc and interactive web that was available to the public to help them formulate and submit comments.

Comments on the DEIS and the Proposed Revised Forest Plan were received from nearly every state. The majority of the comments were from outside Alaska (90 percent). Most of these comments dealt with Wilderness designation, particularly on the Copper River Delta. Local residents expressed most of the interest in motorized and nonmotorized recreational use on the Kenai Peninsula. They suggested as many as 20 different viable management options for some areas.

Follow-up Meetings

As a follow-up, the Interdisciplinary Team (ID Team) held a meeting in each of the communities on the Kenai Peninsula. Meetings were conducted in Anchorage, Girdwood, Seward, Soldotna, and Hope in March 2001. The purpose of these meetings was to focus discussion on the pros and cons of a variety of motorized/nonmotorized recreation management options for areas around their community suggested during the comment period. The ID Team conducted a public meeting in Anchorage in March 2001 to present a brief summary of public comments received during the comment period and a general discussion of the potential changes in the DEIS and Proposed Revised Forest Plan. Meetings were held with government agencies to clarify their comments. Additional meetings were conducted in May 2001 to get ideas from members of the public and other agencies on potential monitoring items, and standards and guidelines to be included in the Revised Forest Plan. In August 2001 the Forest Supervisor met with government agencies and Native tribes to discuss changes in the Preferred Alternative.

Content Analysis

A systematic method of compiling, categorizing, and capturing the full range of public viewpoints and concerns about the DEIS and Proposed Revised Forest Plan, called *content analysis*, was used to review public comments. Content analysis helps the ID Team organize, clarify, analyze, and be responsive to information provided by the public. The content analysis process is not a vote-counting process. The process is designed to read each response, capture the meaning of each individual comment within that response, and provide the ID Team and decision maker information about the issues in an understandable form.

Upon receipt of each response, the Forest Service assigned it an identifying number and entered it into an electronic database. The database identified such items as: type of response, location of respondent, type of document being reviewed, geographic area of concern - primary issue, resource interest area, prescription - key areas, and the text of each substantive comment. The database allowed the Forest Service to query the comments in a number of ways. About 37,250 substantive comments were identified. Substantive comments were reviewed and consolidated by the ID Team into 204 comments to be addressed in the FEIS. Substantive comments are those comments that address the adequacy of the DEIS or Proposed Revised Forest Plan, the merits of the alternatives or the analysis. Comments that simply state an opinion or were outside the scope of this analysis are considered nonsubstantive and are not responded to in the FEIS. Errors noted in the comments were corrected.

Comment Response

The ID Team reviewed the comments and evaluated whether they triggered a change in the alternatives, including the preferred alternative, required improving or modifying the environmental analysis, or supplementing or changing the Proposed Revised Forest Plan. The ID Team then drafted responses to each comment. Some information in the DEIS was corrected or clarified based on public comment containing many useful recommendations for improving the

DEIS and Proposed Revised Forest Plan. In addition, information and recommendations provided by the ID Team were considered and incorporated into the final documents. Although only substantive comments are responded to in the FEIS, all comments are important to the decision maker because they provide information on the opinions and preferences of those who took time to comment. The following is a summary of the public comments on the DEIS and Proposed Revised Forest Plan by subject area.

Summary of Public Comment on the DEIS and Proposed Revised Forest Plan

DEIS

The Alternatives. Most respondents did not list an alternative preference. Many of those that did supported Alternative F. Most of these respondents suggested modifying Alternative F to include all of the Nellie Juan-College Fiord Wilderness Study Area and the Copper River Delta as Wilderness, replacing the backcountry designation (except immediately adjacent to developed areas) with the Recommended Wilderness Management Area prescription, and adopting the citizens' alternative for Wild and Scenic Rivers. Other respondents supported the No Action Alternative or current plan to maintain motorized winter recreational and other multiple use opportunities. Some respondents supported the Preferred Alternative. Many of these respondents suggested changing the Alternative to include more Wilderness, more snowmachine and helicopter closures, and fewer helicopter landings. Other respondents felt that the Preferred Alternative failed to meet the mandate for multiple use. Some respondents supported Alternative A, and/or the No Action Alternative. Most of these respondents were concerned about additional snowmobile closures. A few respondents supported Alternatives B, D and E.

Planning Process. There were a few comments on the planning process. Some respondents were concerned with tribal rights, coordination with the management of adjacent lands, the cumulative effects analysis, the use of key indicators, the use of the new planning rule, and the legality of the EIS and Revised Forest Plan.

Environmental Effects. Many respondents commented on the environmental analysis. Some respondents felt that the situation created by the spruce bark beetle epidemic was not adequately addressed. The Kenai Peninsula Borough recommended adoption of more comprehensive provisions for dealing with the epidemic.

There were many suggestions for improving the wildlife effects analysis. Several respondents felt that the cumulative effects analysis was not adequate. Many people wanted additional wildlife species included in the analysis and that more attention should be given to the brown bears on the Kenai Peninsula. Some respondents were concerned with the effects of aircraft overflights on wildlife.

Some respondents questioned the ownership of "coastal lands" (tide and submerged lands). Some respondents felt that the DEIS did not address significant impacts to adjacent lands.

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Several respondents were opposed to any additional restrictions on winter motorized use. They wanted no net loss of areas for snowmobiling. Some respondents disagreed with specific closures to winter motorized use (Crescent and Carter Lakes, Divide Creek area of Bench Peak, Ingram Creek (timeshare), Johnson Lake, Lost Lake (timeshare), Russian Lake, Seattle Creek, Skookum Valley, Snow River, and Twentymile Valley). Twentymile is popular with local snowmobilers, since the Girdwood Valley has been closed to snowmobiling. The backside of Turnagain Pass (Seattle Creek) is possibly the most popular and heavily used area in the state. Either open the Resurrection Pass Trail to snowmobiles on a full-season basis, or swap the springtime restriction of snowmobiles on a seasonal basis. Some respondents did not agree with any plan that restricts access to an open area on a "date type" criteria. One respondent suggested closing Portage Valley to snowmobiles instead of the Twentymile Valley, Skookum Valley, Seattle Creek, and Snow River areas. Another thought was that Kern Creek, Peterson Creek and Bear Valley provided adequate nonmotorized areas. One respondent wanted the snowmobile areas at Turnagain Pass and Placer/Skookum closed to non-snowmobilers. The proposed closures of the Skookum and Twentymile Valleys would close 2/3 of the limited, beginner level terrain.

Several respondents wanted to see the Proposed Revised Forest Plan more effectively address nonmotorized recreation needs. Some respondents suggested additional closures (Johnson Pass Trail - north end, Snow River, 4 miles north of the Canyon Creek footbridge, the slope behind Summit Lake Lodge, Fresno Ridge, Crescent and Carter Lakes, Russian River Trail, Jack Bay, Sawmill Bay, Marshall Pass, Manitoba Mountain and Tiehack Mountain). Some respondents supported setting aside a minimum of 10 percent of the Kenai Peninsula for nonmotorized recreation. Areas identified as best meeting this need included the Resurrection Pass Trail corridor and the Lost Lake area – with a 50/50 time share (one respondent wanted the cutoff date moved from April 1 to March 1), Snow River and South Fork Snow River, expanding the Manitoba area, a time share on Carter/Crescent Lakes and the North end of Johnson Pass. Another respondent thought the addition of Seattle Creek, Kern Creek, Peterson Creek, and Bear Valley along with previously identified terrain in Turnagain Pass would be adequate to provide for the needs of nonmotorized recreationists. Still other respondents wanted Jack and Sawmill Bays closed to all motorized use and South Fork Snow River, Johnson Pass Trail, Carter and Crescent Lakes, and Fresno Ridge closed to snowmobiles. Some respondents favored closing most of the Kenai Peninsula to snowmobiling, while another wanted snowmobiles limited to designated routes and trails. One respondent wanted the Martin River drainage closed to motorized use in the summer.

One respondent suggested, for the Twentymile Valley, that we 1) substitute a split season motorized closure for an alternative year closure or 2) designate a motorized corridor on the west side of the valley. They also suggested for Johnson Pass, that the motorized use closure boundary should be moved from Center/Divide Creek to Bench Creek until reaching the bridge where Bench Creek makes a 90-degree turn. And for Seattle Creek, the nonmotorized

designation is useless unless snowmachines are prohibited from reaching the ridge. It is too dangerous for snowmachines and skiers to share the one safe route into the area. Another respondent objected to these proposed changes because of the loss of solitude.

The State of Alaska believed that more work is necessary and that additional options be explored to craft acceptable solutions at Lost Lake and the Twentymile areas. Displacement of concentrated motorized use at Lost Lake could shift to the Resurrection Pass Trail area, which supports the Kenai Mountain caribou herd, a moderate density of moose, and a limited number of sheep and goats.

Several respondents commented on the level of helicopter landings. Some respondents wanted “no change” in the areas currently open to helicopter landings. Others supported a reduction in the areas open. Some were concerned with the level of helicopter activity around Seward. While still other respondents did not want any restrictions on helicopter landings in Wilderness. The State of Alaska was concerned about the potential impacts of increased heli-skiing and heli-hiking in important goat and brown bear areas.

Several respondents wanted the Forest Service to prohibit or limit jet ski use. Other respondents wanted the use of airboats restricted. One recommended an exception for seasonal use on the Copper River Delta. Another respondent suggested that because of the low number of users, under Wilderness, this use be phased out. One respondent wanted some lakes (like Bench and Johnson Lakes) closed to floatplanes.

One respondent mentioned that there had been no documented evidence of damage to flora and fauna by the motorized user group. Others questioned if there had been any specific studies done and, if so, what were the results. The USDI recommended that the FEIS discuss potential impacts to air and water quality, wildlife and human health. Since most of the snowmobiling takes place on the Kenai Peninsula the direct and cumulative impacts should be addressed.

Some respondents supported preserving all roadless areas. Some respondents questioned how the new Roadless Rule would be implemented.

Several respondents were concerned with access rights and traditional activities.

Many respondents supported additional Wild and Scenic Rivers (Alternative F). Rivers recommended included the entire Twentymile System, Snow River, the entire Nellie Juan River, Gravina River, Rude River, Upper Russian River, and all rivers in the Copper River Delta (Alaganik Slough, Bering River, Copper River/Copper River Delta, Katalla River, Martin River, Martin Lake, and Bering Lake. Other respondents were opposed to recommending any Wild and Scenic Rivers for designation.

There were numerous comments on Wilderness recommendations. Nearly 28,000 respondents supported additional Wilderness. Most of these respondents requested Wilderness protection for the Copper River Delta, Prince William Sound (Nellie Juan-College Fiord Wilderness Study Area, Knight and Montague

Islands, and Jack and Sawmill Bays), and the Kenai Peninsula (brown bear habitat, Snow River, and the Kenai River watershed). Respondents noted that the Copper River Delta was the largest intact wetland on the Pacific Coast of North America, habitat for healthy salmon and commercial fishing, 16 million shorebirds and waterfowl, moose, brown bears, wolves, beavers, and more. Several respondents were opposed to any logging or mining on the Delta. Several respondents supported a working draft of the Preferred Alternative that recommended Wilderness designation for the eastern portion of the Copper River Delta. Respondents noted that Wilderness designation would help species in the Prince William Sound that had not recovered from the 1989 *Exxon Valdez* oil spill and would protect wildlands from being overrun by unregulated large-scale industrial tourism. Other areas recommended for Wilderness include Twentymile, Snow River, Resurrection Creek, Russian River, Seattle Creek, Hinchinbrook Island, Hawkins Island, and Montague Island.

Some respondents were opposed to any Wilderness classification. They did not want any recommended Wilderness or supported only the absolute minimum Wilderness designation. A few respondents were specific to the east side of the Copper River Delta. Most of these respondents supported the 501(b) - 2 Management Area prescription for the area. Other respondents were fearful that with Wilderness, over time, traditional and current permitted uses would be curtailed.

Some respondents questioned the timber and minerals data and analysis. Others thought the economic analysis was not complete.

Proposed Revised Forest Plan

Forestwide Direction. There were many suggestions to improve and strengthen Forestwide standards and guidelines. Many of these comments centered around wildlife concerns.

Management Area Prescriptions. There were many suggestions to change management area prescriptions. Many of these suggestions centered on Wilderness designation, wildlife values and motorized/nonmotorized use. Several respondents felt that utility corridors should not be allowed in the Brown Bear Core Area Management Area prescription. A number of respondents suggested that road construction was not compatible with the management intent of the Fish and Wildlife Conservation Area Management Area prescription. Many people said that the wide variety of exceptions for motorized/nonmotorized use relative to the prescriptions were difficult to understand.

Monitoring and Evaluation. There were many suggestions to improve the monitoring plan. The Environmental Protection Agency stated that the monitoring plan be revised and refined. They had several suggestions to improve it. Another respondent suggested the Revised Forest Plan provide a more comprehensive and detailed discussion of how research and monitoring would be incorporated into the management of the Forest over the next 10 years.

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Access Management Plan. There were many suggestions to change the Access Management Plan. Many of these suggestions centered around the motorized/nonmotorized issue on the Kenai Peninsula.

Our responses to these and other substantive comments on the DEIS and the Proposed Revised Forest Plan are found in Appendix K of the FEIS.