

SAR - DEIS - Chapter 2 Only

<i>Comment #</i>	<i>Comment</i>
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0022288-005

- Of the eight alternatives (which include the No Action and Preferred), six are heavily weighted towards preservation and only two provide for any multiple use management.

0026810-001

GENERAL COMMENTS AND RECOMMENDATIONS

Audubon Alaska has been pleased with the Forest Service's emphasis on fish, wildlife, and recreation in the plan revision and your open public process that allowed a diversity of alternatives to be submitted by many public interests. We consider alternatives D, E, and F to be generally acceptable plan alternatives with minor modifications. Alternatives A, B, and C are not acceptable to Audubon. Although the Preferred Alternative is moving in the right direction from the previous forest plan, we believe there are some important changes that should be incorporated in the final plan. Our comments and recommendations follow.

0029059-008

Comment #9: The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. The public is being asked to comment on what amounts to varying degrees of preservation.

0029063-049

Page 2-9* line 263 This summary of the Brown Bear Core Management Area prescription, ". . .to maintain landscapes and their associated ecological processes to provide habitat for brown bears..." does not seem to coincide with the more detailed description of this prescription in the

Forest Plan. The detailed version allows human developments for the purpose of reducing bear human interactions, when those very developments could result in increased bear-human interactions. We suggest the two versions be reconciled

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0029063-050 Page 2-15 and 2-16. Table 2-4 and Figure 2-2 The information summarized in this table and figure is inaccurate/misleading because it appears to be based on categorizing land status in a manner inconsistent with the definitions provided for Categories 1-5. As a result, we believe this table and figure gives the reader the false impression that the preferred alternative largely advocates land management which will result in little human influence to wildlife and other natural resources. For example, in the Brown Bear Core Management Areas prescription identified as category 2, the following would be permitted: managed vegetation, campgrounds, roads, trails, large groups (Up to 100 people), high concentration of users, developed sites, motorized use, minor tourism developments, hardened campsites, historic structures, cabin (both existing and new), utility corridors, power generation facilities, power transmission lines, administrative facilities, and geophysical prospecting. According to Table 2-4, many, if not all of these activities are more appropriately classified as Category 4 or 5. If other category prescriptions in the document are proposed to allow similar intensive human uses, then it would be expected that the preferred alternative could turn the CNF into a heavily impacted area more accurately described as a Category 4 or 5 region, where conservation of fish and wildlife could become increasingly problematic. It appears that the descriptions of the "low human impact categories (i.e., category 2) allow for a great deal of impacts, yet the "high human influence categories (i.e., category 4 and 5) do not provide for mitigation or lessening any of the impacts to wildlife. In summary, (a) wilderness is the prescription that is clearly "wildlife friendly," and (b) the definition standards appear to be inconsistently applied, resulting in a misrepresentation of the impacts associated with the preferred alternative. We recommend this be corrected.

0036561-003 The State recognizes that developing a multiple use plan is a challenging process. The State commends the Forest Service on the collaborative and consensus-based approach used in creating the broad range of alternatives and in developing the proposed plan. The FS is doing a good job of engaging Alaskans to seek fair compromises on key public issues. The ability of any Alaskan or group of Alaskans to craft and articulate a draft plan alternative was an innovative and welcome approach to the planning process.

0028328-021 The public planning process, for which the Forest Service is to be highly commended, must not be ignored. Of the 33 alternatives developed, the public developed 20. Of those, 17 recommended significant portions of the Chugach for wilderness. Fourteen of those 17 were more protective than the preferred alternative. For example, six out of the seven alternatives developed in Cordova recommended at least the eastern portion of the Delta be recommended for wilderness. Cordova District Fishermen United further recommended the Barrier Islands be wilderness and proposed a limitation on airboats on the Delta. Of all 33 alternatives (10 of which were drafted by the Forest Service), 18 included wilderness for the Kenai, while 19 included wilderness for the Soond. Given this level of public (and internal) interest in permanent protections on the Chugach (coupled with scoping comments and the two household surveys), the preferred alternative should reflect a much greater level of recommended wilderness, especially in biologically important areas.

0029399-005 6. The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. The public is asked to comment on what amounts to varying degrees of preservation.

0029460-006 The ACA prefers levels of resource protection similar to those that would occur under alternatives E and F.

0029469-001 Introduction

SEACC appreciates the opportunity to comment on the Draft Chugach Forest Plan Revision. The Forest Service's emphasis on fish, wildlife, and recreation in the plan revision and the open public process that allowed a diversity of alternatives to be submitted by the public is encouraging. Although we did not participate in the initial development of the alternatives, we consider Alternatives D, E, and F to be generally acceptable with minor modifications. Alternatives A, B, and C are not acceptable.

Comment # Comment

- 0034442-002 Of the eight alternatives, including the No Action and Preferred, six are heavily weighted towards preservation and only two provide for any multiple use management. Of the 22 prescriptions used in the alternatives, 1 allows for future resource development, 1 allows for current mineral development, 1 pertains to transportation/utility systems and 19 are preservation oriented.
- 0034442-006 Though the insufficiency of the data used in the planning process has been noted on several occasions (December 19, 1997; October 30, 1997; November 1, 1999), the Forest Service declared the data sufficient in January of 2000, and released the DEIS with its proposed alternatives on October 14, 2000.
- 0034827-002 It is a biased plan that does not provided for a range of alternative uses and a reasonable and acceptable combination of uses. It is biased and suited to a National Park - Not a National Forest.
- 0034837-007 7. The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. The public is asked to comment on what amounts to varying degrees of preservation.
- 0034897-004 6. The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. Instead, you've asked us, the public, to comment on varying degrees of preservation. Of the 22 prescriptions used in the alternative only 1 allows for future resource development. Only 1 allows for current mineral development and only 1 pertains to transportation/utility systems and fully 19 are preservation oriented. Now that's a real fair and even-handed presentation of options for us to comment on!
- 0034898-006 6. The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. Instead, you've asked us, the public, to comment on varying degrees of preservation. Of the 22 prescriptions used in the alternative only 1 allows for future resource development. Only 1 allows for current mineral development and only 1 pertains to transportation/utility systems and fully 19 are preservation oriented. Now that's a real fair and even-handed presentation of options for us to comment on!
- 0034926-007 7. The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. The public is asked to comment on what amounts to varying degrees of preservation.
- 0034928-010 6. The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. The public is asked to comment on what amounts to varying degrees of preservation.

Comment # Comment

0034942-003

I contacted Mona Spargo (Public Involvement) requesting some way for the Forest Service to meet with the public to clarify some of these issues as soon as possible. I mentioned to her that several people were confused and they had difficulty understanding the proposed Alternatives. I mentioned errors, contradictions, and the short time allowed for comment on the Alternatives. I stressed the importance of clarification. I got no response. Notification of public meeting and input after the Alternatives were released was minimal.

0034942-008

-- It is unfair that the Forest Service has taken over three years and eight million dollars to come up with proposed alternatives that leave only two months for user comment. Given the biased tone of the alternatives, the vast complexity of the numerous alternatives, prescriptions, and existing laws mandating the Forest Service, this is insufficient and unacceptable. Obviously, further public input is needed.

-- Furthermore, there are misleading errors and inconsistencies within the alternatives that the public has not yet been made aware. This is wrong. It is imperative that Americans clearly understand, without question or unknowingness, what the plan means. The Forest Service has a duty to inform the public of the errors immediately.

0035340-002

- The evaluation of the impact the Alternative will have on this area has not been provided so I will not support it.

0035818-002

In the proposed plan, preservation of land in the Chugach National Forest receives prevailing support. Of the eight alternatives, only two provide for any multiple-use management. This singular emphasis on preservation does not meet the Forest Service's own mandate for 'multiple use' of national forest lands. The proposed revisions in this plan are more suitable to the management of a national park than a national forest.

0035900-003

The eight alternatives are heavily weighted towards preservation, which is emphasized throughout the plan.

0035947-002

I oppose the USDA Forest Service's Preferred Alternative and supporting EIS for the Chugach National Forest Proposed Revised Land Management Plan.

I strongly urge the Forest Service to select an alternative or mixture of alternatives that emphasizes non-motorized recreation opportunities, preservation of Wilderness character, and maximum protection of Wild & Scenic eligible rivers.

0035953-002

I strongly urge the Forest Service to select an alternative or mixture of alternatives that emphasizes non-motorized recreation opportunities, preservation of Wilderness character, and maximum protection of Wild & Scenic eligible rivers.

Comment # Comment

0036314-012

-- There is no cause for such a drastically managed DEIS. I see no cause for the Chugach to be further restricted. Rather, I feel it should be managed in the way Congress clearly implied.

-- The Preferred Alternative is obviously preservation and environmental based.

-- There are errors and contradictions within the plan that have not been addressed publicly.

I strongly reject the Preferred Alternative or any proposed Alternatives. The plan is too restrictive, limiting, and conditional. I find it unfounded. I find it out-of-touch with what is really going on in the Chugach.

0036322-006

I understand that, by law, the plan must be revised every 10 to 15 years. But without some great circumstance, it does not make sense to revise the plan so drastically as the Forest Service proposes, I have lived in Alaska for over 30 years and I have used the Chugach National Forest many times while representing a multitude of user groups. I have experienced the Chugach in vast, remote areas where most never venture. I can tell you first hand that the Chugach is thriving and meeting its expectations as a National Forest...in every aspect. There is no need for such drastic measures (Alternatives).

Although it is nearly impossible for the average person using our National Forests to understand the proposed alternatives, by studying your plan I have become aware of some very important and stunning issues:

-- The Forest Service did not offer a reasonable range of alternatives with a reasonable combination of uses. The Forest Service biased the alternatives with only several levels of preservation available for comment. The plan ignores a full range of alternatives, which represent multiple use, and a combination of uses. The plan refuses to acknowledge all users. It seems there is much to lose and nothing to gain here....and for no good reason.

-- It is unfair that the Forest Service has taken over three years and eight million dollars to come up with proposed alternatives that leave only two months for user comment. Given the biased tone of the alternatives, the vast complexity of the numerous alternatives, prescriptions, and existing laws mandating the Forest Service, this is insufficient and unacceptable. Obviously, further public input is needed.

-- Most importantly, it is evident that the Preferred Alternative ignores section 501(b) of ANILCA by further restricting use and assigning specific prescriptions within the Chugach. ANILCA specifically states that multiple use activities are permitted in these areas consistent with conservation offish, wildlife, and recreation.

-- Surprisingly, the Preferred Alternative is not backed by the substantiation of up-to-date, unbiased scientific studies and data. I found some data used to be over 20 years old and very inaccurate. A modern geophysical survey does not exist. Mining data used is 70 years old. Brown Bear Core areas are mysteriously established and include no proof of where or why they should even exist. A Brown Bear count in this area is unavailable. Unbelievably, local fish, game, and wildlife experts have not been contacted. Scientific data is absent. Considering telemetry studies as scientific information for establishment of Core areas is ignorant.

-- The Preferred Alternative does not allow for potential resource development, and it leaves only a minute portion available for mineral development, transportation and utility systems.

-- The Preferred Alternative encompasses and manages waters that are already managed by the State of Alaska. Given the importance of Alaskan fisheries, this is a major conflict and a contradiction of law. Who will have authority to manage?

Comment # Comment

0036322-007

0036324-015

Comment #9: The DEIS does not include a reasonable range of alternatives and a realistic combination of uses. The public is being asked to comment on what amounts to varying degrees of preservation.

0036324-018

Comment #12: The DEIS and the analysis of the alternatives do not contain an Initial Regulatory Flexibility Analysis (IRFA) as is required by the Regulatory Flexibility Act (RFA) (5 USC 601-612). The RFA requires agencies to consider the impact that a proposed rulemaking will have on small entities. The CLMP qualifies as a proposed rulemaking within the meaning of the RFA.

0036572-001

Please accept the following comments on the Proposed Revised Forest Plan and Draft Environmental Impact Statement for the Chugach National Forest

- 1) While all alternative plans state that 'Subsistence activities are emphasized'. It is not a main component of any alternative. This statement appears to be tagged on as an afterthought in the various alternatives. As a federally recognized Tribe with documented traditional and customary use of the area, the Native Village of Eyak requests that subsistence use be given priority in the plan revision. We understand this priority to apply to rural residents and to mean that every acre of the Chugach National Forest is open to subsistence hunting, fishing and gathering and that nothing in this plan shall restrict that use or preference. As such, subsistence use should appear first and foremost in the final alternative.