

# *SAR - DEIS - Chapter 3 - Physical - Air*

## *Comment #    Comment*

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Indicators for "Environment and Effects"

Physical Elements are a critical early indicator of ecosystem health. Significant key indicators of health and potential impacts are missing from this section. Almost without exception, in order to comply with regulations the Forest Service needs to add key indicators measuring the presence and type of resource extraction, numbers and types of motorized vehicular traffic on waterways and non-roaded areas, and numbers and types of visitor days. For example, on any given day a cruise ship will impact air quality to a greater degree than will a group of kayakers; one visitor day does not necessarily equal another. Key indicators must take into account those activities on the Forest likely to negatively impact the effected resource.

Air Quality The Clean Air Act requires the Forest Service to evaluate all management activities that may impact air quality. The Chugach is currently classified as Class 11 under the Clean Air Act, although areas in Wilderness would have the greatest likelihood of attaining Class X. As nearly 99% of the forest actually qualifies for wilderness, it's less than disappointing that the Forest Service has no interest in managing for higher air quality. Instead, the DEIS states: "Because no Class I areas are designated on the Chugach National Forest, our PSD [Prevention of Significant Deterioration] permitting responsibilities are limited."(3-5) (Emphasis added)

Of particular importance is Prince William Sound, an area the Forest Service expects to see a tenfold increase in visitors as a result of the Whittier access road. Cruise ship, ferry and other motorized traffic on Prince William Sound will certainly affect air quality, yet are not even addressed. Oil and gas development is likely to begin this coming summer in the Kata11a area, which will certainly impact air quality. Also, increases in snowmachine use on the Kenai Peninsula, especially in the preferred alternative, will contribute to additional carbon monoxide pollution in the Cook Inlet Intrastate Region, an area already heavily impacted. (See section on Motorized Recreation for data on pollution outputs.) Three key indicators should be added; 1) Numbers and types of motorized vehicles on waterways, 2) Numbers and types of motorized vehicles on trails, unpaved roads and unroaded areas, and 3) Presence of oil and gas exploratory and/or drilling activities. Numbers of recreation visits should be changed to read: Numbers and type of visitor days.

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2. Air. This section fails to analyze air pollution from motorized access and recreation. Concentrated snowmachine use in areas such as Turnagain Pass and the Twentymile-Placer River area already produces seriously degraded air in these locations at certain times of the year. The amount and concentrations of pollutants can and should be estimated based on emissions per hour per machine, concentration of machines over space and time, and dispersal models widely available in the scientific literature. An additional problem concerns emissions from tour boats which degrades visual quality in areas of Prince William Sound. Both snowmachine and tour boat emissions have increased rapidly over the past several years