

SAR - DEIS - Chapter 3 - Uses - Access Management

Comment # Comment

- 0021792-001 I strongly oppose the lose of any lose to Winter Motorized Access to any of Chugach Forest. I specifically oppose limiting Lost Lake, Carter / Crescent Lake and the 20 Mile River Valley special use (Quiet People) should build there own trail systems and quit taking ours.
- They already have [Illegible] Pass Mill / Fresh Creek trails locked up. Also the good side of Turnagain Pass.
- Work with the user groups to establish their own trails and quit just [Illegible] us out. We have been here using these area and would be willing & share, but those groups have a history of confrontation not cooperation like Katchamac Bay Ban on Jet Skis.
- 0022483-004 IV. There is no analysis of the impacts wilderness designations would have on access to private in holdings, adjacent private lands, or potentially developable land within the forest.
- IX. Designation of additional conservation units (i.e. Wilderness, Wild and Scenic River etc.) severely limits access to private in-holdings, public lands, and adjacent private lands.
- X. Such designations could block access to lands with a management prescription that permits some resource development activity.
- 0028504-012
- Airboats:
- Examples from other parts of the country, such as Big Cypress, demonstrate the negative impacts that these craft can have on public land resources. We feel strongly that airboats should be banned from the forest. Among other things, they are known to damage riparian vegetation, impact nesting birds and impact other users of public lands. They are incredibly loud machines, and their noise travels for miles. We understand that some hunters use them in the Cordova area, and Forest Service personnel use them for research and other administrative tasks in the Copper River Delta region. We feel strongly that if not banned, the Forest Service should strictly limit the level and times of use for these land and water craft. Again, the DEIS needs to address the impacts of this type of motorized use on forest resources.

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0028504-014

Helicopters:

Maps produced by Alaska Center for the Environment in conjunction with Alaska Conservation Alliance clearly outline the huge percentage of the Chugach National Forest proposed to be open to commercial helicopter activity in the draft preferred alternative. For example, it appears that approximately 79% of the Kenai portion of the Forest would allow winter commercial helicopter landings (approximately 73% allowed, and 6% conditionally allowed). TWS does not support this wide-open approach to commercial helicopter activity on the forest, and we are disappointed that the Forest Service appears to be opening up the majority of the forest to this activity.

We wrote in our most recent response to Chugach Powder Guides (CPG) 2001 heli-ski permit that:

We understood at the time of our Settlement Agreement (2/19/99) that a more complete impacts analysis of proposed commercial helicopter activities would occur during the Forest Plan Revision process, and we continue to expect that the Forest Service will use the Revision process to complete this type of analysis.

Thus far, the Forest Service has not completed a legitimate cumulative impacts analysis of motorized activities on the forest, including commercial helicopter activities. As stated above, we believe this renders the Forest Plan DEIS inadequate and out of compliance with NEPA.

Further, we do not believe the Forest Service has collected sufficient information regarding impacts to wildlife from commercial helicopter activities to warrant the current level of commercial helicopter permits, much less open up such large percentages of the forest to this type of use (please refer to the attached TWS comments on CPG's 2001 permit, 11/21/200, Attachment 3). We believe the Forest Service has violated NEPA and the Bald Eagle Protection Act with the current level of helicopter activity on the forest. We cannot see how a decision to open up such huge areas of the forest to commercial helicopter use would be considered a sound management decision on the part of the Forest Service. Specifically we are concerned about impacts to mountain goats, brown bears, wolves, wolverine, lynx, moose and raptors, among other species.

Additionally, we are aware that the Forest Service signed an Interagency Agreement with the Fish and Wildlife Service in 1990 regarding Bald Eagles. The agreement outlines a number of items relevant to helicopter activities (please see attached MOU, Attachment 4). They are as follows:

Among other things, the Forest Service agrees to:

- 1) Avoid repeated helicopter flights within 1/4 mile of active bald eagle nests, particularly with large helicopters used for yarding timber. Heliports and helicopter logging flight corridors will maintain at least a 1/4 mile distance from active nests.
- 2) Annually develop Statements of Work by March 1 to be performed by the FWS for each Tongass National Forest Administrative Area, Chugach National Forest and FS Regional Office when work is anticipated or needed from the FWS. The Regional Forester delegates the development and approval of the Statement of Work to the appropriate Forest Supervisor, and to the Director of Wildlife and Fisheries Management, Regional Office. The FS will reimburse the FWS for work performed in the amounts set forth in the Statement of Work.

Among other things, the Fish and Wildlife Service agrees to:

Conduct detailed surveys identified in annual Statements of Work to locate bald eagle nest trees, mark all nest trees with identification tags, provide

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adequate beach markers to facilitate the relocation of the nest trees, and provide technical assistance.

CPG's 2001 permit requires helicopters to keep a distance of 330' from active bald eagle nest sites, not 1/4 mile. The Forest Service is not in compliance with this MOU at this time. It has not ensured a 1/4 mile buffer between helicopter activities and bald eagle nests, nor has it worked with the Fish and Wildlife Service to gather necessary survey information regarding active bald eagle nests. There have been no scientifically credible surveys of bald eagle nests in the five years the Forest Service has issued helicopter permits to CPG, much less the many other years the agency issued permits to other operators. For this and other reasons, we do not believe the Forest Service has sufficient information at this time to be able to make sound management decisions regarding commercial helicopter operations that are in compliance with NEPA. Again, TWS cannot support the Forest Service's proposed liberal open policy regarding commercial helicopter use on the forest.

0029063-051

Page 3- 17, line 462-463 The Preferred Alternative is grouped with those alternatives that would provide for the most new trail construction. Most trails would be constructed on the Kena Peninsula. We recommend that any new trails be located away from high use brown bear area

and other sensitive habitats. Trails should be located in the high country and not along anadromous fish streams with thick riparian cover. A policy for closing trails (on a temporary basis) when bear use is high should be discussed in the Final EIS