

SAR - DEIS - Chapter 3 - Uses and Designations Only

<i>Comment #</i>	<i>Comment</i>
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0029063-034	<p>Landscape The Chugach-St. Elias Ecoregion is dominated by ice, snow, and rock. The Copper River Delta, PWS, and Kenai Peninsula are three distinct geographic areas within this ecoregion. The Draft EIS states that because of the ecoregion's large scale, it would not be affected by any management activities under any of the Forest Plan alternatives. On page 3-42, it states the Kenai Peninsula and Copper River Delta are currently undergoing responses to large-scale environmental conditions that have changed vegetation succession patterns or stand conditions. The Kenai Peninsula has historically received the highest levels of disturbance, both natural and human-caused. Past and ongoing management activities have mostly occurred in lower elevation areas, which has fragmented valleys and wildlife travel corridors. Disturbances on the Kenai Peninsula account for a loss of approximately 37% and 28% mixed hardwood softwood and hemlock-spruce cover types, respectively (Table 3-15). Although management intensity varies by alternative, it becomes apparent that future Forest Plan management activities will continue to be concentrated at lower elevations, where past and ongoing management disturbances are having the greatest present effects. Cumulatively, this may have a significant affect upon the ecoregion.</p>
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We believe lower elevation habitat within the Chugach-St. Elias Ecoregion will be affected by / most management activities. We suggest that the Final EIS further evaluate and address cumulative, direct, and secondary impacts

Comment # Comment

0029063-047

Effects of Snowmobiles (also includes jet ski and all-terrain vehicles) Snowmobiles are current equipped with two stroke engines. These engines discharge up to one third of their fuel unburn into the environment. In a notice filed this year by the Environmental Protection Agency, estimated snowmobiles and all-terrain vehicles produce 1.1 million tons of hydrocarbons a year or 15 percent of all that is emitted from mobile sources, including cars, trucks, airplanes, locomotives and lawnmowers. Furthermore, by 2010, that share is expected to increase to 20 percent. According to engine data from the California Air Resources Board, one hour of two stroke engine use produces more smog-forming pollution than a modern car creates in one year (CARB Data). Concerns with such discharges are associated with the effect of toxic emissions on air and water quality and direct discharge into the environment.

Studies confirm that water quality and the marine ecosystem can be affected by toxins released by snowmobiles. Ingersoll and associates (1997) found air pollution around trail heads and

snowmobile corridors, that often run along rivers and streams, can increase the acidic and toxic concentrations of nitrogen, sulfate and hydrocarbon compounds in snow. The elevated levels of NOx can contribute to acid rain and acid snow. This release of pollutants may have far reaching consequences for surrounding watersheds. Particulate matter emissions from snowmobiles may be another concern as it relates to human health (i.e., respiratory problems).

Snowmobiles contribute to direct and indirect wildlife impacts. Direct impacts include harassment, chasing, and killing of wildlife. During winter, when energy expenditure is extremely important to an animal's survival, an additional stressor such as being chased, or even the noise produced by snowmobiles, can affect an animal's energy balance. Indirect impacts include disruption in population dynamics, movement and distribution patterns, and habitat use. (Wildlife that take advantage of snowmobile groomed trails are at a tremendous advantage over those that do not, which can have a significant effect on predator-prey relationships. Brown bears, wolves, bald eagles, and lynx have been found to be adversely impacted by snowmobiles JIPS 1990).

Schmid (1972) found compaction on off-road trails had serious adverse impacts on small

mammals living beneath the snow. Their habitat can be compacted by the grooming of trails or

by creating a packed trail on ungroomed trail. Compaction can result in habitat fragmentation and induce suffocation and death of small mammals. Snow compaction can also affect vegetation productivity and growth, organic matter decomposition, humus formation, and microbial activity, by decreasing soil temperature and slowing snow melt (Aecium 1980; Ked et al. 1979). On the Kenai Peninsula, for example, it is not uncommon to see traces of snowmobile trails long after most snow has melted each spring.

Snowmobiles also disrupt the peace and quiet valued by many non-motorized users. Studies conducted at Voyageurs National Park documented that a single snowmobile could be detected from a distance of 400-600 feet depending on the terrain (flat, rolling) and noise from five snowmobiles could be detected at a distance of 800-1,000 feet (Mestre Greve Assoc 1992). Another significant issue is the injury and death caused by snowmobile-triggered avalanches. This may be the result of increase in snowmobile power, and advancements in technology that allow snowmobilers to travel to previously inaccessible avalanche-prone terrain.

The Draft EIS acknowledges adverse effects from snowmobiles, but states they are generally

limited to areas of access. Further, it states that adverse impacts can include vegetation damage and soil compaction when used during times of inadequate depth of snow. We recommend that

Final EIS discuss potential impacts to air and water quality, wildlife, and human health. Since most of the proposed snowmobile activity identified under the Preferred Alternative would take place on the Kenai Peninsula, we believe the Final EIS should address the direct and cumulative effects this activity would have on this area. Furthermore, the Final EIS should reexamine the potential direct and cumulative impacts caused by snowmobile use in the CNF, specifically on the Kenai Peninsula, and establish appropriate standards and guidelines to monitor these effects.

Comment # Comment

- 0028328-034 Mineral potential on the Chugach is generally not high; in fact, only 5% is considered most favorable. The majority of mining claims are small operators in road-accessible areas, such as the Kenai Peninsula. Although the Wildlife Study Area had written into its language specifically stating its availability to mineral exploration, little to none has been explored. If there were significant mineral potential in the Sound, it would have been developed years ago. Table 3-93 shows significant decline in mineral production. And according to a report by Steve Nelson, USGS, "Current feasibility evaluations suggest that production is unlikely for any of the lode deposits at current prices" (3-397). In other words, the DEIS states there is little favorable potential, reports that production is unlikely, yet the preferred alternative leaves nearly 75% of the forest open to mineral exploration, at the potential expense of other resources enjoyed by a greater majority.
- The same logic applies to oil and gas development. The DEIS acknowledges most of the forest has no potential for oil or gas, yet much of the Chugach remains open to exploration. Even the Katalla area has low potential and, in fact, has never produced much even at the height of operations. Over a thirty-year period, 18 wells produced a mere 1.54 thousand barrels.
- ACE has requested, in scoping comments and during the planning process, a forestwide environmental assessment of mining activities, current and past. This request has yet to be addressed. The DEIS does not address cumulative impacts from past, present or foreseeable mining operations. Instead, for each type of mineral exploration, the DEIS basically states that there is no expected cumulative effects. What is this conclusion based upon? There is no baseline data from which the DEIS draws. Conversations with Forest Service staff indicate a lack of general understanding what impacts may exist from past mineral activities. For example, the aforementioned orphaned Katalla wells, or the Granite mine in Ilamson Lagoon, to name a few. Crescent Creek and Resurrection Creek both have been significantly altered due to mining operations. The latter has experienced a significant decline in salmon numbers (Environmental Assessment to Hope Mining Company Plan of Operations, 1999). Without adequate information about past activities, the DEIS cannot possibly assess cumulative impacts.
- 0034413-003 3. The proposed CLMP does not meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'
- 0034413-008 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.
- 0034875-002 Recommend as part of the legislation that existing levels of motorized use on the sloughs of the Delta and low-impact fish and wildlife habitat improvements be included as allowed, non-conforming uses.
- Commercial timber harvest, mining, industrial-scale tourism, helicopter landings and new road construction should be prohibited on Montague Island; they are incompatible with fish and wildlife protection.
- 0034904-008 7. Recommendations for 'Wilderness' and Wild & Scenic Rivers severely limit access to private in-holdings and adjacent private lands.
- 0035167-006 The DEIS is extremely environmental / preservation oriented. The drastic restrictions proposed are not supported by adequate studies, data, or reasoning. I do not see why the Chugach can not be further managed in its current state rather than further restricted. I see no reason or cause for such a drastic DEIS change. . 3) Negates traditional use in these area.

Comment # Comment

0035240-004

Let local forestry service people manage there designated areas as they see fit to benefit all environment, economics and recreation outside involvement only confuses matters.

0035240-005

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0035342-002

Maximize local involvement in decision making process, involve all user groups.

0035343-003

It is illegal along with pitting user groups against each other local users should receive the most consideration when determining land uses.

0035565-001

Our recommendation is that the preferred alternative be rewritten to meet the multiple use requirements of ANILCA and that the forest service quit trying to turn this state into the National Park of Alaska.

0036315-001

We feel that local social, cultural and historical uses of the Chugach National Forest have not been evaluated. Where are your unbiased studies that you have conducted to justify land use restrictions and limitations are needed. We are growing as land user, so we don't need more closures or restriction on any new proposed plan with out substantiation scientific studies by an unbiased firm.