SAR - Forest Plan - Chapter 3 - 522

Comment #	Comment
0022288-007	- 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.
0028389-010	Preferred Alternative Cooper Landing Bypass We urge the Forest Service to not let ADOT&PF dictate the Forest Plan for the Cooper Landing area.

0034929-004

ROADS

The Proposed National Forest System Road Management Strategy, on which Wildlands CPR submitted extensive comments, proposes an important shift in emphasis from 'transportation development' to 'managing access within the capability of the land,' and it incorporates the use of the best available science at appropriate scales. This new policy, which would affect all Forest Service lands, proposes a reduction in new road construction, and an emphasis on road decommissioning. One component of this new Strategy is the Roads Analysis process for examining existing risks and opportunities of the Forest Service road system.

-- remedy the lack of biological/ecological prioritization of all road work - deconstruction, decommissioning, maintenance, and reconstruction;

-- provide specific, but overarching direction to protect roadless values; and

-- promote ecosystem restoration and sustainability. The Forest Service can create roadless areas and protect roadless values by removing roads.

2) All illegally created unclassified routes should be closed until site-specific analysis can be completed to determine whether to remove or decommission the travelway, or to open and classify the travelway as a road, motorized route or non-motorized trail.

3) With extremely limited exceptions, no new roads should be built. The new Chugach LRMP should focus on reversing the ecological damage caused by both unneeded roads, including temporary roads and roads that only serve log-hauling functions, and so called 'needed' roads.

Also, new road construction should be strictly limited to projects that result in a large reduction in road impacts in a given watershed, and only to enable retirement of more ecologically damaging existing roads in the watershed. In such situations, offsetting obliteration should occur prior to new construction.

4) The Forest Service must set default limits to road construction in certain sensitive areas. Forest Service Chief Mike Dombeck has repeatedly stated that roads are the most significant thing you can do to the landscape. But all roads are not equal.

5) The new policy must take into account road effects on watershed and landscape level management. The Forest Service should set rigorous process-based standards such as the demonstration that roads have no impacts on migration, sedimentation processes, and various edge effects.

The Forest Service also has an opportunity to create and implement road density standards for wildlife and fisheries. This would include specific standards for road-sensitive species where such information is available, and road density reduction targets where species-specific information is not available. The weighted coefficients are as follows: open roads in cover (.7); open roads in non-cover
(1.9); trails or closed roads in cover (.3); trails or closed roads in non-cover (.6).

6) Roads clearly remove barriers
(vegetation/biomass) that exclude plants from a site.

SPECIFIC ROAD ISSUES ON THE CHUGACH NATIONAL FOREST:

Cooper Landing Bypass
We were surprised to see the Cooper Landing Bypass, which has been proposed by the Alaska Department of Transportation and Public Facilities (ADOT&PF), mentioned in the Preferred Alternative. To our knowledge, this controversial project was not

Comment #	Comment
	discussed at any of the IDT meetings. This proposed project is highly controversial because its basic purpose is flawed. Previous studies for this project have not only been based on questionable analysis of the supposed benefits, but a misrepresentation of the impacts on wildlife and outdoor recreation. In addition, ADOT&PF planners have been selective in choosing their public participation, essentially leaving out user groups who stand to lose the most if the project is able to somehow finagle approval.
0035632-001	Any plan must provide for road transportation into Cordova and expanded road mileage within the Cordova, Copper River, Prince William Sound areas. As a Cordova property owner, I have owned a house there since 1983, these transportation concerns are very real- But road transportation is also important to America's general population and traveling public. Given that Alaska has an aging tourist base, restricting amenities, like campgrounds (including motorhome facilities) and motorized access to and within the forest, frustrates and undermines the Forest Service's obligation to manage for the benefit of the American people. Not every visitor to the forest is youthful and in peak physical condition. In addition to road transportation benefiting Cordova residents and Alaskans generally, the management plan must ensure that all Americans can enjoy the Chugach Forest with increased road access and travelers facilities throughout the forest, a Forest Service obligation. Multiple use is key to a good Chugach Forest management plan-
0036309-006	9. I do not believe a Bear Creek / High [Illegible] Creek highway corridor for the sterling highway near Copper landing should be included in the final plan. Such a corridor would be highly destructive to this area. An alternate Santa Valley high corridor should be considered and is more appropriate.