

SAR - Forest Plan - Chapter 2 - Basic Principles

Comment # Comment

0026984-005

Pg 2-7 Principle 4-5 state the [Illegible] is open to [Illegible] allowed public [Illegible] management & access to private land [Illegible] unless restriction in law [Illegible] as the revised plan. The plan places more restrictions on the forest and will reduce access.

0028546-002

Remember also, we have national parks, forests are managed for different reasons and uses please don't turn them into parks too. We all need them (Parks and Forests) and we all need to share them.

0034298-003

National Forests were designed not simply for multiple-use, but WISE multiple-use.

0034775-005

3. The proposed alternative does not appear to meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'

0034827-001

This plan is a SINGULAR rather than MULTIPLE use document. It is NOT in keeping with the mission of the USFS to manage public land for multiple uses.

0034837-003

3. The proposed alternative does not meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'

0034897-002

1. The planning process and the proposed Plan have been illegally biased due to the declared intent of maintaining the 'wild character' of the Forest. By declaring this intent as your predetermined conclusion you have doomed the CLMP to being biased against multiple use or the best combination of uses. Such a predetermined conclusion is arbitrary and capricious.

2. The proposed CLMP does not meet the NFS' mandate for multiple use, nor does it reflect the 'best combination of uses.'

3. The minerals evaluation is a bogus joke, with most of the data dating from the 1930's.

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- 0034898-002 1. The planning process and the proposed Plan have been illegally biased due to the declared intent of maintaining the 'wild character' of the Forest. By declaring this intent as your predetermined conclusion you have doomed the CLMP to being biased against multiple use or the best combination of uses. Such a predetermined conclusion is arbitrary and capricious.
2. The proposed CLMP does not meet the NFS' mandate for multiple use, nor does it reflect the 'best combination of uses.'
- 0034898-005 5. Predictably, given the inherent bias and predetermined conclusion of the revised CLMP and Draft EIS, there is no analysis of the impacts such 'Wilderness' designations would have on access to private inholdings, adjacent private lands, or potentially developable land within the forest. Maybe you're just waiting for CARA to pass so you can buy out all inholdings or adjacent private lands. In that case I guess there's no reason to study the impact of 'Wilderness' designations on private land inholdings. So much for the sanctity of private property rights.
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!
7. You have ignored the needs of disabled and older Americans with 95% of the Forest inaccessible to these groups of people.
8. We strongly oppose the prohibition on helicopter landings in wilderness areas. I enjoy remote, back country skiing and even though most of the time I get to where I start carving my turns under the power of my own two strong legs, I enjoy and want to maintain the option of accessing remote slopes via helicopter. The supposed negative 'impact' of heli-skiing is a false and overblown claim.
9. We also oppose restrictions on snow machining except on the Tin Can Mountain side of the Seward Highway that has been traditionally closed to snow machining anyway. Tin Can is a popular and awesome site for telemarking and it is appropriate to exclude snow machining there, as it has been either by practice or policy for years.
10. You have used embarrassingly outdated data to assist you in recommending these preservation options. The Kenai Peninsula Timber data is 13 years old, the Forest-wide timber data is 22 years old, the minerals data, as stated above, is from the 1930's and is based on locations of past development and not on the locations of developable deposits. The interagency Minerals Coordinating Group recommended in April 1999 that a modern airborne geophysical survey be completed for the CNF before completion of the CLMP. No such survey was requested much less completed. Why? That's a rhetorical question because the obvious bias in this plan answers that question. The NFS knew where it wanted to go and it has built a road of paper with this CLMP and Draft EIS to get there.

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0034901-001

I have always enjoyed numerous activities on Forest Service land. Logging roads provided access to forests that inspired me as a youth to enjoy the wild qualities in nature and pursue a life in Alaska. If people can not enjoy a wild land experience by accessing an area with a road, it is a fault of their own.

Your multiple use mission allows the Forest Service an attainable goal. The current push in the public for roadless national forests, I feel, is in direct conflict of your agency's mission statement. You and your team are stewards of our wonderful resources of the Chugach National Forest. I love the Kenai and the fact that I can visit F&WS federal land, USFS land, and USNPS land as I see fit. I am concerned, however, that current trends in the Forest Service have your agency leaning more towards a 'Park' mentality. If yourselves and USF&WS evolve towards the park service, then the whole peninsula will be like a park. Where are the checks and balances? I thought the different agencies kept an area diverse. Wilderness designation or roadless designation will recruit users, crowds, and groups with the 'park' mentality (you need only to designate a natural area to truly make it crowded) and displace those of us who enjoy the forest now. There is enough land set aside as wilderness areas and land not accessible by roads (you need to only look at a map) in Alaska already.

Our Chugach National Forest is over 5 million acres if my memory serves me right. That is an enormous area! Plenty of room for multiple uses. The Kenai on whole is much larger than that. An ecosystem management regime for the entire Kenai Peninsula would clearly show that the scales are tipped towards the wildlands side and especially roadless side already. Those in the public pressing for no roads should be thankful for the relatively small population on the peninsula, lack of a road network, and Kenai Fjords National Park. I think many people don't understand the scale of things up here, and if they did, would begin stressing roadless plans for areas east of the Mississippi long before coming our way. It is a big enough region for us to enjoy all uses.

The road issue is my biggest concern with your plan. I must be honest, I have not read your plan, yet I have these concerns. I love the Chugach National Forest and you are its stewards. I feel that if the public were truly informed with THE FACTS, 5% might favor a roadless moratorium on Alaska National Forests. They are the same 5% that voted for Ralph Nader and the Green Party nation wide. I respect them and enjoy their role in the public process. Not considering Misty Fjords, Admiralty Island, inaccessible 'by road' chunks of land bigger than most states, Alaska is protected on a scale most do not understand. Alaska with its national parks alone meets the criteria for those who fight the roadless fight. They are preaching to the choir here, we Alaskans love our roadless wildlands.

0034904-003

2. The proposed alternative does not meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'

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0034913-001

I. The proposed revision does not meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'

-- Under the preferred alternative none of the Forest's 5.5 million acres is designated for Resource Development. Only 6,860 acres are set aside for pre-existing, site specific mining claims. Less than a quarter of one percent of the forest is available for mineral development and transportation/utility systems.

-- Under the preferred alternative there is no allowable sale quantity (ASQ) of timber, and no attempt to establish guidelines for a sustainable timber harvest.

-- The preferred alternative 'emphasizes Wilderness recommendations and provides a mix of Wild and Scenic River and Research Natural Areas recommendations.' Not only do these designations violate the 'no-more' clause of ANILCA, they close the door on future exploration and development opportunities.

-- There is no analysis of the impacts wilderness designations would have on access to private inholdings, adjacent private lands, or potentially developable land within the forest.

-- Throughout the preferred alternative preservation is the prevailing emphasis, which is a singular rather than multiple use of the public resource.

-- 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.

-- 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.

-- Rather than 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. The plan is so biased that it appears better suited for a national park management plan.

-- 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.

-- Such designations could block access to lands with a management prescription which permits some resource development activity.

-- Though fixed wing aircraft can land in wilderness areas, helicopters may not, and therefore access to a vast roadless area is reduced significantly.

-- What is being done to ensure that disabled Americans can access the Forest and have a memorable 'Alaskan experience?' Flightseeing and helicopter landing sites should NOT be scaled back since restrictions on landings are already too severe.

-- Many recreational activities (lodges, cabins, campgrounds, boat landings, etc.) would not be allowed in much of the forest

-- The preferred alternative ignores congressional language in Section 501 (b) of ANILCA by assigning prescriptions in the Copper River area that are far more restrictive than those established by Congress. Highly restrictive prescriptions in the preferred alternative, including Wilderness, will restrict multiple uses in the delta that are allowed by Congress. In expanding the boundaries of the Chugach, Section 501(b) mandated by statute how both the Copper/Rude River addition to the forest and the Copper/Bering River portion of the forest would be managed. The statute stated that multiple use

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activities would be permitted in these areas as long as those activities were consistent with conservation of fish and wildlife.

-- Given that Alaska has an aging tourist base, how does restricting amenities, like campgrounds, motorized access to the forest, and helicopter landings fulfill 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. We have an obligation to ensure that all Americans can enjoy the Chugach.

0034926-002

2. The planning process and the proposed Plan have been illegally biased due to the declared intent of maintaining the 'wild character' of the Forest. Such a process with a predetermined conclusion is arbitrary and capricious.

3. The proposed alternative does not meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'

0034928-005

1. The planning process and the proposed Plan have been illegally biased due to the declared intent of maintaining the 'wild character' of the Forest. Such a process with a predetermined conclusion is arbitrary and capricious.

2. The proposed alternative does not meet the Forest Service's mandate for multiple use, nor does it reflect the 'best combination of uses.'

0034932-001

The vision document outlines five guiding principles, which we will continue to strive toward for all national forests. The five principles are:

1. The integrity, health, and sustainability of wild land ecosystems shall be the goal of all management;
2. Do no harm to the forest environment;
3. Planning and management shall be based on the best available information and scientific understanding;
4. Management activities shall be economically sound and foster growth of natural asset values;
5. Citizens shall have the opportunity to participate in the decision-making processes affecting their public forests.

0034938-010

-- USDA Forest Service regulations - and other Federal regulations - require that our national forests be managed for multiple uses. I am not aware of any provisions in these regulations which REQUIRE the segregation of uses and/or users by land use designation/description. I strongly believe that public land uses and users interests are best dealt with by active, responsible management on the part of the USDA Forest Service. As such, I believe that land use prescriptions are being used by the USDA Forest Service as a means to avoid active management of the public lands.

0034942-007

In this mind-set, there will be no need for the Forest Service at all, because there will be nothing left to manage. It will already be managed to its maximum and totally preserved...forever. Our National Forests will become National Parks. It is unlawful for the Forest Service and extreme environmentalists to restrict the Chugach National Forest beyond the intent of Congress and the Forest Service's own governing laws.

There is no doubt that local user group conflicts may exist. This is a result of access and facility limitations coupled with current user restrictions and past land preservations. These conflicts are nothing that can't be settled locally in the basement of our town halls. There is no need for Federal mediation. Mediation does not mean restrictions and conditions. Mediation means management by the Forest Service involving local groups. Further restricting the Chugach will only exacerbate these conflicts. It will only be catering to the agenda of one group.

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- 0034952-002 According to ANILCA the Chugach Forest as designated by congress is to be multi use, you do not have this in your new plan.
- 0034994-003 1. I demand more local user involvement in all C. N. F. recreational management decisions.
- 0035062-001 Congress designated the Chugach to be multiple use. I would recommend that do not break federal law and keep it that way.
- 0035183-006 I like to see no more closures or restrictions. which does not meet the multiple use requirement of ANILCA and the NFS.
- 0035188-003 I also feel that the plan discriminates between user which doesn't meet multiple use requirements of ANILCA & NFS.
- 0036315-004 They have taken the multiple use recreational activities out of there Preferred Plan.
- 0036321-010 -- USDA Forest Service regulations - and other Federal regulations - require that our national forests be managed for multiple uses. I am not aware of any provisions in these regulations which REQUIRE the segregation of uses and/or users by land use designation/description. I strongly believe that public land uses and users interests are best dealt with by active, responsible management on the part of the USDA Forest Service. As such, I believe that land use prescriptions are being used by the USDA Forest Service as a means to avoid active management of the public lands.
- 0036321-012 -- I strongly endorse the active management of the Chugach National Forest by the USDA Forest Service with active involvement of the public. I would like to see local user groups actively involved in all short-, intermediate-, and long-term planning activities to include land use, facility development, services development, etc.

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- 0036572-002 2) The Revised Forest Plan is excessively complex. The Executive Summary states that 'Multiple-use principles and ecosystem management are common in all eight alternatives' and yet a simple multiple use category does not exist. There are instead numerous categories, management area prescriptions, ecological processes and alternatives. The Native Village of Eyak proposes that the plan be reduced and simplified to only three categories: A. Multiple Use B. Restricted Use (limited to 10 or less items) and C. Wilderness. If the Forest Service is truly interested in improving communication and information available to ensure public participation, then a less complex plan should be developed.