

Natural Disturbance

Comment # Comment

- 0020-002 2) Harvest all Beetle killed trees as soon as possible This is only good conservation of our resources.
- 0023-002 -Using dead beetle kill spruce OK but not a necessity. Good to leave some standing for wildlife use. Rather seem them be utilized than to stand & rot.
- 0023-003 My understanding is that live spruce are potentially a higher fire hazard than dead spruce because of the pitch content of live trees.
- 0024-007 7) Minimal tree cutting. Even beetle killed trees.
- 0030-002 2) There happens to be a bark beetle problem here on KP - and how do we stop it? Moose Pan looks sick. How's this for an idea: clear cut a wide transverse swatch here in the Valley - thusly removing susceptible trees, then the next spring when the litter buggers are hatching out - set a blaze to the currently infected timber and try to halt the spread.
- 0037-003 Commercial timber harvesting isn't appropriate Logging on the pretext of controlling bark beetles is dishonest. Let natural fires burn. Make some your loggers don't set more fires this year. Don't do any logging in the Kenai River
- 0038-006 6--No burning--it destroys good bacteria for depths up to 7 inches.
- 0042-001 1. Plan ahead for such disasters as the Spruce Bark Beetle and eradicate the problem when it begins instead of allowing further infestation as has been done during this spruce beetle infestation.
- 0047-001 I want to see you be "pro-active" Dead trees are just that Dead. If someone wants to buy and utilize them, that is good! The Forest is not "Dead." By your actions (the revised Forest Plan) we can speed up the natural process so the Forest will recover, be more Diverse Biologically - support more critters - be healthier and more resistant to insects & disease - other mosaic - more fire included where appropriate. Multiple use and many users. Don't let the non use fanatics steer you toward Preservation over conservation. Good Luck.
- 0053-001 I would like to see the USFS harvest some of the dead spruce.
- 0054-002 Clearcutting should be limited to small areas of timber that may have been killed by fire, insect or disease.
- 0066-001 (1) A healthy forest is vital for the long term and I really would like to see more of the beetle killed trees in the Moose Pass area harvested or just put a little road into some of the areas and allow more firewood cutting.
- 0069-006 Prescribed burns may be appropriate near populated areas to reduce the danger of larger uncontrolled wildfires. Other methods of vegetation manipulation are unnecessary. This land did fine before people came along to manage it.
- 0076-001 (1) Use best scientific data available (2) Determine impacts to non-timber resources (aesthetic quality, wildlife habitat, hydrology) caused by spruce beetle infestations.
- 0079-004 Harvest spruce bark - but revegetate - plant new seedlings. Six mile Maintain Seward Hwy for scenic beauty
- 0081-001 I support harvesting as many beetle killed trees as is economically feasible. I expect that this be done with all due concern for the existing ecosystem.
- 0088-001 At present I have no comments except to say I do not approve of the way the Spruce beetle problem was handled. I feel that when the problem started the beetle should have been sprayed to keep it from spreading. The beautiful spruce trees in our yards are now in jeopardy.
- 0095-001 At this point in time, i feel it is imperative that we harvest as much of the trees killed by the Spruce Bark Beetles as possible, within the scope, of course, of economic feasibility. This is an important resource that should not go to waste. It is my understanding that the damaged trees will deteriorate quite rapidly after a few years making them worthless for almost any kind of use. In the event that is the case, I feel time is of the essence for their harvest, notwithstanding the objections and complaints from the rabid anti-resource development and/or environmental NUTS!
- 0120-003 (2) I hope a new plan will expedite the removal of the beetle infested trees in Moose Pass so we can regain our healthy forest!
- 0125-001 Get a move on... Remove dead trees to rejuvenate the forest. Science is factual. Don't listen with an ear that some interest groups "speak" for the "public" I too am part of the public. Move accessible dead trees. Provide ILLEGIBLE

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- 0126-001 You asked for topics which I felt should be addressed in the Revision Process. I feel that increased timber production should be addressed. The Chugach is one of the largest forests in the United State, but contributes a fraction of the timber needed for our state or national needs. A real pest management control program should be put into place. As managers you need to do what you know is best for the land, not what a few well funded radical groups want you to do. Your job is to manage the forest, not play politics.
- 0127-002 (2) We need to log the primrose/Snow River area, but the bunny huggers will sue and litigate to the point of letting those trees before a fire hazard 5 to 10 years in the future
- 0128-003 A specific timber concern that I have long had relates to the, areas infested by the spruce bark beetle. In my opinion, not only should the stands of trees that are infected or are dead be removed but individual isolated trees as well. I have observed that this is done even in the national parks. In my, opinion, here is an instance where public opinion should have little influence. The removal of trees that become a threat to the forest or to the public should not be a matter for public hearings.
- 0146-001 The new plan should emphasize specific actions to restore forest health, reduce the risk of catastrophic fire and maintain a multiple use mandate In which national forest policy has long been rooted. Support a management prescription to restore forest health through timber harvesting. - Spruce bark beetle activity In the Chugach continues to increase at alarming rates, consuming vast viewsheds and leaving once-healthy timber stands In a dead or dying state. Beetles have shown no respect for buffer zones, viewsheds or private property. Point out that logging of beetle-killed timber should be considered the first stage In a reforestation process that will lead to healthier forests
- 0152-001 Dear Chugach National Forest, My brief comments for your revision issue: Yes, Logging of beetle killed timber. Seems like common sense for us to focus on this right now.
- 0154-001 (1) Dead and dying trees in the large areas of spruce bark beetle infestation should be harvested. This action would be the first step in a reforestation project. Such reforestation should be conducted under scientific silvicultural
- 0172-001 The Plan should specifically address strong actions to be taken to save the forest from the ever expanding destruction caused by the Spruce Bark beetle. It is imperative that ongoing forest health be maintained through initiation of a long term timber harvesting schedule. The best way to realize value in those trees already killed is through the appropriate use of economically feasible selective logging. This will allow reforestation to occur much sooner in effected areas as well as slowing the spread of the beetle to healthy trees. The Chugach is far too valuable for us to continue to stand by and watch it be decimated by the beetle.
- 0183-003 Due to the beetle epidemic on the Kenai you should have an increased salvage program to minimize losses. This epidemic on the Kenai is not natural as claimed by the non-development proponents. It is due to intensive protection from fires which have not allowed the forest to renew itself. You can provide jobs, help stem the epidemic, and renew the forest by having an accelerated salvage program. A salvage program is actually too late. You need to be converting high risk stands to young vigorous stands before the beetles move in. There can be both economic benefit and all other resource uses to satisfy everyone if you do your job as required in National Forest mandates.
- 0188-003 Finally, we hope you take the spruce bark beetle "Lemon" and make lemonade by allowing harvesting of the dead trees before they rot. Why not! Best of luck in your efforts. Hope our comments will be helpful.
- 0189-002 We believe that this is a mistake that is evidenced by the recent history of the Chugach. There have been very few timber sales proposed and many of those that have been considered have been withdrawn because of protests by environmental and wildlife groups. It is a well known fact that older spruce are more susceptible to beetle infestation than are younger trees. The absence of a continuing harvest has increased the number of older trees in the forest and contributed to the rapid spread of the beetle. Forests are a renewable resource. Managed forests will renew themselves after a harvest, keeping a desirable mix of age classes. Unmanaged forests are not eternal. Especially in the boreal forest, they are subject to removal by fire. Standing dead trees could make a fire widespread and catastrophic, possibly destroying the seed source and converting the overstory to grass. This is quite likely what made the Caribou Hills near Homer a grassland and may be in the process of doing the same in the old beetle kill near Tyonek. We believe that harvest is an essential part of management of the Chugach and ask you to continue to
- 0204-003 Spruce Bark Beetle Logging should continue, but only after a cost-benefit ratio can be established to make it profitable for the U.S.F.S. as well as the logging contractor. (I've seen where the road costs exceeded the harvest)
- 0255-001 Historic fire-suppression & "management" has created enviro. ripe for beetles & fire danger.
- 0262-007 1. A. Management direction of CNF. Response to Spruce Bark Beetle. Healthy Forest.
- 0264-005 3) FOREST HEALTH - BEETLES - NO LOGGING

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- 0293-001 I would like to applaud your decision to not salvage log the Chugach.
- 0295-003 3. FOREST MANAGEMENT -- The CNF is not being actively managed at this time. The FS should employ proven silvicultural techniques and scientific forest management to restore Forest health including timber harvest and controlled burns. White spruce and Lutz spruce are important indicator species of forest health in the CNF. Spruce bark beetle kill is decimating the spruce Forest, meanwhile the harvesting of dead and dying trees has been halted. Logging of beetle killed timber must be a first step leading to a healthier forest. An annual commercial timber cut must be allowed in the Forest to maintain a healthy forest and a healthy Forest Products Industry. The CLMP should establish an annual schedule for timber harvest, including a schedule of specific sales which it must adhere to. It is worth noting that the present Forest Plan included annual timber harvest quotas, but very little logging actually took place because the line officers did not propose sales. The new CLMP should contain a provision for specific sales to be made on an annual basis Logging roads should be retained, not obliterated, to provide access for forest
- 0296-003 Practical use of beetle-kill timber should be promptly implemented. If the current plan is not working, then a revised plan with incentives to promote this use should be implemented.
- 0301-002 2. Timber Harvest: It is pathetic the amount of timber harvested off this forest. The Chugach has an allowable cut of millions of board feet but has basically not harvested any. An aggressive timber sale program with sales that can be economically logged needs priority. This is a national forest, timber harvest is the major reason for its
- 0305-001 It is very important for the Chugach to begin immediate implementation of a salvage program to utilize beetle killed timber and also to improve forest health.
- 0307-002 Also we would like to know how this plan addresses fire management and the spruce bark beetle infestation. Our concerns may be from a distance in location, but your plan would involve us due to how water flows, fire can roar over mountains, and beetles can cover large forest areas. If you can please assist us with this requested information, we would gladly provide you our comments on your plan.
- 0333-003 Spruce bark beetle activity in the Chugach continues to increase at alarming rates, consuming vast viewsheds and leaving once-healthy timber stands in a dead or dying state. Beetles have shown no respect for buffer zones, viewsheds or private, property. Point out that logging of beetle-killed timber should be considered the first stage in a reforestation process that will lead to healthier forests faster than if nothing is done.
- 0336-003 The spruce bark beetle epidemic is a prime example of what happens when no active forest management is allowed. the salvage of dead and high risk trees should be of paramount concern to both your agency and that segment of the public truly interested in conservation of the Nation's resources.
- 0337-002 My second major concern relates to the huge amounts of beetle-killed timber throughout the Chugach National Forest and particularly on the Kenai Peninsula. Accordingly, I urge that logging of beetle-killed timber be considered as the first stage in a reforestation process that eventually will lead to healthier forests. When it comes to addressing the spruce-bark beetle infestation problem, we have failed to reach a mutually acceptable corrective policy for entirely too long. The time has come for all interested parties to reach a consensus on means for managing the forest so that we ultimately will have a varied species composition with different age classes.
- 0337-005 My sincere hope is that we can be proactive in restoring the forest health and reduce the risk of catastrophic fire. We need to get back to the basics and dedicate our efforts toward developing an asset as opposed to fostering a
- 0365-002 Burns logging
- 0366-005 1. A. Don't Burn without falling the Timber first Because of Access for animal to new food source 2. A. Look at old burn in how it took 5 or 6 yr. for Moose to get access.
- 0367-002 3. A. Removal of spruce kill and what it will do to the Peninsula 4. A. Locals
- 0374-004 Spruce bark beetle
- 0375-008 Spruce Bark Beetles 4. A. Too many layers
- 0392-003 Need better vegetation map that shows specific spruce bark beetle range in entire - CNF - introduction of "Exotics" - suck as planting rings where there are not natural
- 0397-005 1. A. Use prescribed Fire & Wildfire burning within prescription as the primary agent of forest regeneration on Seward Ranger District. This would work in the long term
- 0397-006 2. A. For reasons of forest health, and to discharge your responsibility to deal with a problematic fuel load. The fire ecology of the Kenai Peninsula demands more fire.

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- 0397-007 3. A. Budget money to create a fire organization on SRD. Contract with State Division of Forestry for initial attack of wildfire in critical & full fire protection areas. Use SRD personnel for developing and implementing prescribed fire
- 0397-008 4. A. Leaders in the FS seem to regard logging as the best way to regenerate. The obstacle arises because the public doesn't like logging. Overcome the impasse by explaining fire to the public and getting pro- fire leaders.
- 0400-012 - Fire protection: The plan should recognize that fire is an integral part of the region's ecology and promotes forest regeneration. Fire management and suppression should concentrate on defense of inhabited areas. Backcountry areas should be reclassified to allow less intensive responses to wildfires. The forest service should map areas of high fuel load and identify places where all-out suppression is not necessary to protect public safety.
- 0404-017 Fire plays a beneficial role in forest ecology. Prescribed fire should be used to reduce fuel near (within 100 feet of) structures to prevent the loss of life and property and to encourage forest regeneration and habitat. The USFS should aggressively suppress all unplanned fire ignitions that threaten life or private property. Ignitions occurring elsewhere should be addressed according to the Alaska Interagency Fire Management Plan.
- 0444-005 FIRE plays a beneficial role in forest ecology. Prescribed fire should be used to reduce fuel near (within 100 feet of) structures to prevent the loss of life and property and to encourage forest regeneration and habitat. The USFS should aggressively suppress all unplanned fire ignitions that threaten life or private property. Ignitions occurring elsewhere should be addressed according to the Alaska Interagency Fire Management Plan.
- 0458-007 Use logging of beetle killed trees only to establish "fire protection zones" around existing structures. Urge people/agencies to use metal roofs on structures to minimize fire dangers.
- 0479-046 Forest Health and Spruce Bark Beetle: In the past few years, salvage logging has been proposed on the Chugach to address so-called "forest health." Forest health has been defined by the former Chief of the Forest Service, as, ". . . a desired state of forest health exists where extant biotic and abiotic influences do not threaten resource management objectives now or in the future -- including ecosystem functions" (Thomas 1995). TWS does not find "forest health," as defined by Thomas, to be an acceptable term upon which to base forest management decisions. TWS would like the Forest Service to move away from using this narrow and controversial term (and the concepts heretofore developed around "forest health") in the revision process, and instead approach forest resource management from a more holistic perspective, where "ecology" and "natural forest cycles" have some value within Forest Service terminology and policy-making. We would like to suggest the Forest Service use the term "forest ecology" in place of "forest health." Allowing "natural forest cycles" and "forest ecology" to have value in Forest Service terminology and policy-making is not only consistent with the National Forest Management Act (NFMA), but is especially important to TWS when addressing aspects of the Chugach National Forest such as the spruce bark beetle. We would like to see the Forest Service discuss the spruce bark beetle as a natural and inherent part of spruce forests, whose prevalence is affected by climactic conditions and stages in forest succession. When addressing the spruce bark beetle in the revision process, we would like the Forest Service to address long-term, ecosystem-based solutions for the spruce bark beetle, and not turn to logging as the only "cure" for the spruce bark beetle. Pacific Northwest scientists have released reports and recommendations which suggest that salvage logging may well slow the recovery of beetle infested forests (Beschta, R.L. et al., 1995, and the Eastside Forests Scientific Society Panel, Washington and Oregon). Given that salvage logging may well slow the recovery of beetle infested forests, TWS would like the Forest Service to turn its attention to alternatives other than salvage logging in recovery efforts regarding the spruce bark beetle, such as prescribed fire.
- 0479-047 Fire: Fire is the primary agent for forest regeneration, which for the Chugach could have important management implications at this time. Fuel load will increase as more trees die and fall from beetle kill. TWS would like the Forest Service to address this issue using prescribed fires as a solution to fuel load build up in the revision process, not salvage logging. We would like to see the Forest Service map out areas where concern over fuel load is high, and where prescribed fires are a viable solution. Clearly areas surrounding private lands and occupied dwellings may need alternative management methods, such as creating fire breaks.
- 0479-049 In addition, we would like the Forest Service to advocate for more forested areas away from private land to be classified as "moderate" or "limited" in the Interagency Fire Management Agreement, and we would like to see this change in policy reflected in the Chugach Forest revision process. The Interagency Fire Management Agreement is geared toward fire suppression, which may be appropriate close to private lands, but is not necessarily appropriate in the backcountry. We understand the boundaries for the various fire protection zones within the agreement are being redefined at this time. Allowing fires to burn, where they do not threaten communities or private property, will
- 0490-011 Salvage logging is important to the curtailing of the Spruce Bark Beetle infestation. The removal of the Dead Trees and the replanting of the areas will enhance the Repair of the Damage to these areas. The faster we an get started on this the sooner we can again see Beautiful forests!
- 0495-004 2. Salvage logging should NOT be permitted in any form because it interrupts the natural quality of the forest, and only serves to provide increased distribution of infestation material as logs are dismembered, cut into smaller pieces to be moved through other portions of the forest. There is a natural cycle of GROWTH-DECAY-GROWTH-DECAY that needs to take place, and while a cycle in taking place it strains the overall quality of the forest to impress upon it the economics of clear-cutting currently affected areas.

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- 0550-001 8) Recommend an effective plan to eradicate the spruce beetle and an ecologically sound plan to harvest spruce beetle killed spruce trees.
- 0692-001 I disagree with the entire form letter. Get on clearcutting and salvage logging beetle kill spruce on the Kenai Peninsula before the timber is unsellable and rotten on the stump causing a major forest fire hazard and is more unsightly than re-planting after logging.
- 0695-001 There is too much logging & road building occurring now all over the Kenai Peninsula because of bark beetles. It is best to let the forest resupply itself naturally.
- 0701-001 Use fire to regenerate forests.
- 0705-004 A beetle-killed forest is still a forest. It does not need our salvage logging. Besides there is new information about the use of older beetle killed spruce that can be used for value added local artistry work.
- 0736-002 Yes - log insect infested timber!
- 0772-001 Spruce beetles are nature they have been around as long as spruce trees. Stop using it and listening to people (corp.) that use that as an excuse to destroy!
- 0775-010 Do not use bark beetles as an excuse to log - no salvage logging.
- 0779-001 Code me pro-fire. Fire can clear a path out of the dilemma that the beetle has imposed on land managers. You know that the epidemic has become too widespread to halt. You know that forests need regenerating and you know the potential for destructive wildfire. The FS failed to achieve enough public support for logging as the response to beetles. If properly explained, fire will garner public support and will enable you to reach your stated goal of forest health. Part of your explanation to the public should include distinguishing between the inhabited front country and
- 0779-002 The public did not allow you to use beetles as a can opener to road and log the backcountry. It will allow you to prescribe fire there to regenerate forest health. The public also demands that you protect the inhabited front country

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0779-004

BACKGROUND Wildfires have played a major role in establishing the vegetative communities of the Kenai Peninsula including portions of the Chugach National Forest. Land clearing and steam locomotives, in use on the Alaska Railroad from 1915 until the 1950's, caused numerous fires along the railroad right-of-way which spread to the surrounding forest. Near Moose Pass, the many early-successional-stage forests dominated by hardwoods resulted from these fires. Turn of the century mining, land clearing and resulting fires have had the same effect around Cooper Landing. Large fires in 1959 (10,000 ac. Kenai Lake) and 1969 (2,600 ac. Russian River) established vigorous stands of hardwoods with spruce trees in the understory. The maturing birch forests around Hope resulted from the 2,500-acre fire of 1907. Owing to the rarity of ground-stroke lighting on the Kenai Peninsula, human activity causes almost all fires. The Chugach National Forest typically has approximately 10 to 15 fire starts every year. On average these grow to about 2 acres. Effective fire suppression prevents them from growing larger. Some fires have escaped and grown large. If included in the calculations, the large, atypical wildfires would skew the average much higher. The ongoing epidemic of spruce bark beetles has killed large numbers of older spruce trees. Consequently, large amounts of potential fuel have fallen to the forest floor. With increased sunlight penetrating to the understory, grass and shrubs in some stands have increased in biomass. In stands not much affected by spruce bark beetles because of a preponderance of hemlock or hardwoods, ordinary vegetative succession continues. On national forest lands and former national forest lands, development of powerlines, homes, towns and campgrounds has occurred. Thus, the fuel complex continues to evolve II. OVERALL MANAGEMENT DIRECTION The Chugach National Forest recognizes the beneficial role of fire in the forest ecology of the Kenai Peninsula. It also recognizes the destructive potential of fires in inhabited areas affected by spruce bark beetles. The Chugach National Forest will manage fire as its primary agent of forest regeneration on the peninsula. The Chugach will suppress destructive fires in populated areas. On national forest land, on those parts of the Kenai Peninsula that do not drain into Prince William Sound, the Chugach National Forest will continue to aggressively suppress, all unplanned fire ignitions that threaten life or private property. Personnel will immediately attack all such fires and either have them extinguished by noon on the following day or develop a plan to extinguish them as soon as practicable. The USDA Forest Service, Chugach National Forest will strengthen its partnering arrangement with the Alaska Department of Natural Resources Division of Forestry. The FS will contribute additional funding to the Division of Forestry. The FS, will delegate responsibility commensurate with that funding, to the Division for initial attack of fires occurring on national forest land. The FS will retain authority to determine fire policy on national forest lands and for determining which fires to attack. On those parts of the Forest that drain into Prince William Sound or the Gulf of Alaska, the Chugach National Forest will allow unplanned ignitions to burn while monitoring them to ensure that they do so safely within prescribed limits. The Chugach National Forest will concentrate its resources on developing and implementing an aggressive program of prescribed fire on the Seward Ranger District and portions of the Glacier Ranger, District. In order of priority, the program will 1. Reduce fuel loads in and immediately around inhabited areas, 2. Regenerate forests in uninhabited areas adversely affected by bark beetles, and 3. Improve habitat for early successional wildlife while leaving appropriate amounts of late successional forest for other species. III. FIRE PROTECTION LEVELS The Chugach National Forest, and other federal and state agencies, have a written agreement regarding fire protection levels on the Kenai Peninsula as well the rest of Alaska. In the "Alaska Interagency Fire Management Plan", agencies have categorized the entire land area for receiving critical, full, modified or limited priority for fire protection. Areas of private property and inhabited areas receive the highest, or critical priority. Areas of high commodity value such as timber receive the next priority, full. Areas receiving modified protection have some commodity value and get immediate fire suppression. However, the land manager may trade off the cost of further suppression with the consequences of greater acres burned. In areas categorized as limited, suppression costs would exceed fire damage and the land manager does not take suppressive action because the fire may benefit the land. The Chugach National Forest will re-categorize some national forest land. Any area currently categorized as critical will remain critical and will continue to receive the highest priority for immediate, aggressive suppression without fail. On a going fire, firefighters will continue to receive resources until they emerge victorious. Most areas currently categorized as modified, will shift to the limited category. Although at one time some of these areas supported timber of some commodity value, the bark beetle epidemic has greatly reduced that value. Now, fire may benefit these areas. The Chugach National Forest will scrutinize areas currently receiving full protection. Within two years, the Forest will determine which areas within the full protection category retain high resource value (timber or other) or would likely spread fire to adjoining critical protection areas. These areas will remain in the full protection category. The remainder of the acreage in the current full category will downshift to the modified category. IV. FIRE PREVENTION AND PRE-SUPPRESSION The Chugach National Forest will continue to assist local communities and individuals in preventing wildfires. The Chugach will strengthen public education in fire ecology and fire prevention. The Chugach will assist in conducting workshops explaining the creation of fire defensible space around buildings. The Chugach will assist Cooper Landing, Moose Pass and Hope in the design, location and construction of fuel breaks close to these communities. The Chugach will continue to cooperate with local volunteer fire departments. In alternate years, the Chugach will conduct introductory fire-fighting courses leading to the qualification of individuals as wildland firefighters. During the Alaska fire season, the Chugach will make available at least one, Type II, fire-fighting hand crew with boss for dispatch to any requesting land manager, The Chugach will continue to operate three, remote area weather stations on the Kenai Peninsula and to make their data available to fire managers. The Chugach National Forest will continue to maintain its 100-person cache of fire-fighting equipment at the Kenai Lake Work Center and will make its contents available to any requesting fire manager. V. WILDFIRE BURNING WITHIN PRESCRIPTION Although prescribed fire will meet most of the fire-related goals of this plan, unplanned ignitions that become wildfires may also meet those goals if the wildfire burns within prescribed conditions of location, wind speed, wind direction, humidity and time of year. Within five years, the Chugach National Forest will specify these conditions on a watershed basis, in those areas where the Forest has already established a goal of reducing fuel load, regenerating forests or enhancing wildlife habitat. Based on the existing fire management plan, literature review, professional judgment and past local experience, the Chugach will develop a policy of allowing

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unplanned ignitions to burn when they do so 1. On lands categorized as modified or limited for fire protection, 2. When they do so within an established prescription and 3. When they do so safely as judged by the land manager in charge. VI. PRESCRIBED FIRE 1. For Fuel Reduction As the highest priority, fuel reduction will command the greatest amount of fire resources during the life of this plan. - In addition to reducing fine fuels resulting from logging, which the Forest will deal with as a separate matter, the prescribed fire program will reduce fuel loads in unlogged stands affected by spruce bark beetles. Because of the rationale of preventing loss of life and property, these burns will occur on national forest lands adjacent to private property and to inhabited areas such as Hope, Moose Pass and Cooper Landing. The prescriptions may result in relatively cooler fires that mostly consume fine fuels and surface litter. 2. For Forest Regeneration In addition to planting trees in logged areas, which the Forest will continue, as a separate matter, the prescribed fire program will regenerate forests with high bark beetle mortality and insufficient hemlock, birch or young spruce to regenerate themselves naturally. These may occur anywhere within forested areas of the Chugach National Forest. To create conditions favorable for tree regeneration, the prescriptions may result in relatively hotter fires that consume fine and large fuels as well as most or all of the duff layer. 3. For Habitat Improvement In addition to the Forests ongoing wildlife program for all species, the prescribed fire program will improve habitat for early successional wildlife. The Chugach recognizes the need of some species for late-successional forests. The Chugach National Forest recognizes that a prescribed fire may have more than one goal or benefit. Prescribed fires designed for fuel reduction or for forest regeneration may secondarily benefit some wildlife. Therefore, burns designed primarily for wildlife will receive the lowest priority within the prescribed fire program. They may occur independently under the wildlife program, they may occur anywhere within the forested or non forested portions of the Chugach National Forest. VII. SCHEDULE OF AREAS FOR TREATMENT Because the success of a prescribed burn depends greatly on weather, the Chugach does not expect to meet the following schedule in full every year. The Chugach does expect to meet the following 7 schedule cumulatively by the end of a 10 to 15-year period. The planning and preparation will occur regardless of weather. The Chugach will reallocate current staffing, and will increase expertise to meet the demands of this increased prescribed fire program. The Chugach will prepare and will have approved burn plans for the following areas as specified by year, with a two-year preparation time for each. Of necessity, a reviewer must regard all acreage figures as approximate to within 20 percent. Year 2000. Upper Kenai River North Side fuel reduction 750 acres forest regeneration 750 acres Year 2001. Upper Kenai River North Side fuel reduction 750 acres forest regeneration 750 acres Year 2002. Tern Lake / Moose Creek fuel reduction 300 acres habitat improvement 300 acres Resurrection Creek/Palmer Creek fuel reduction 500 acres Southwest Trail Lake South of Highway fuel reduction 400 acres Year 2003. 8 Upper Kenai River South Side / Russian River fuel reduction 1,000 acres forest regeneration 500 acres Year 2004. Cooper and Stetson Creeks forest regeneration 1,500 acres Year 2005. Kenai Lake North Shore forest regeneration 1,000 acres Upper Canyon Creek / Upper Quartz Creek forest regeneration & habitat improvement 500 acres Year 2006. Trait Creek forest regeneration habitat improvement 750 acres Granite Creek / East Fork Bench Creek forest regeneration 750 acres Year 2007. Summit Lake fuel reduction & forest regeneration 500 acres 9 Trail Creek forest regeneration & habitat improvement 750 acres Grant Lake forest regeneration & habitat improvement 750 acres Year 2008. South Shore Kenai Lake forest regeneration 1,500 acres Upper Russian Lake / Cooper Lake forest regeneration & habitat improvement 500 acres Year 2009. Middle / Upper Quartz Creek forest regeneration & habitat improvement 1,000 acres Upper Canyon Creek / Upper Quartz Creek forest regeneration & habitat improvement 500 acres Cooper tat improvement 500 acres Upper Russian Lake / Upper Resurrection River forest regeneration & habitat improvement 500 acres end

0781-020 Although ACE believes the forest will regenerate fine on its own, we recognize there may be some areas where prescribed fire may be of benefit. ACE would like to see the Forest Service analyze fire potential as its primary agent of forest regeneration on the Kenai Peninsula, where the vast majority of human inhabitants live within the forest. The Copper River area has seen a significant increase in beetle activity over the last few years and we expect they may be faced with the same salvage logging agenda as did the western forest. Therefore, ACE would like the Forest Service to evaluate fire over the rest of the forest as the primary means of regeneration as well. ACE would like the Forest Service to map, out areas of concern where fuel load is particularly high and/or where there are inhabited structures. Where fire danger is high, closest to communities, ACE would support selective logging to create shaded fuel breaks. However, using salvage logging as a way to address fuel loads is an inappropriate response, we believe and could actually contribute to uncontrolled fire, as was witnessed the past few summers with both the Granite Creek and Crooked Creek fires. In addition, ACE would like to see land classifications mapped out. We believe economics must be weighed when addressing fire. To the backcountry an equal level of fire protection, as afforded to inhabited areas is not economically appropriate and may not be biologically appropriate either.

0781-009 ACE would like the Forest Service to focus on "forest ecology" or "natural forest cycles," thereby promoting a holistic, rather than political, approach to the forest This move toward a biologically sustainable definition will help in also addressing issues such as insect infestation and disease. Insects and disease are part of "natural forest cycles" and ACE would like to see the Forest Service treat them as such in the revision process. ACE would like the Forest Service to look at issues related to global climate changes and past human-related activities that may have a role in current spruce bark beetle cycles in order to holistically address the issue. For example on the Kenai, both Bradley dam and the intertie currently in use are projects which left slash piles behind and may have contributed to

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- 0784-002 Dealing with the spruce bark beetle infestation is one of my main priorities for the Kenai Peninsula and logging of beetle-killed timber should be the first stage of a reforestation process. This tactic will help create a healthier forest faster than if nothing is done.
- 0784-003 More importantly, there is a growing concern on the Kenai about the potential fire hazard associated with the beetle-infested timber. Many residents in my district stand to lose substantial property and maybe even their lives should fire strike. Logging of beetle-infested timber must take place to lessen the potential loss of life and property
- 0811-001 FOREST HEALTH The Spruce Bark Beetle epidemic has been multiplying over the past decade to the extent that it is becoming a safety hazard to those individuals and communities in the Chugach area. While we understand that forest management includes conservation of said forest, we would hope that the plan would also include the use of timber harvest as a means to offset the potential hazard of fires in the area.
- 0817-011 Forest Ecology The plan must address the bark beetle infestation and management across the forest and Kenai Peninsula. Fire ecology and management must also be incorporated into this evaluation. The Forest Service should bring together experts in forest ecology to discuss the relationship of fire, insects, and natural succession of the forest. What is the natural role of fire and insects in the ecology of the Chugach Forest and how should the forest be managed to maintain forest diversity and ecological processes across the forest in time and space?
- 0820-012 ACE concurs with several organizations who suggest a new definition of this controversial and rhetorical model. ACE would like the Forest Service to focus on "forest ecology" or "natural forest cycles," thereby promoting a holistic, rather than political, approach to the forest. This move toward a biologically sustainable definition will help in also addressing issues such as insect infestation and disease. Insects and disease are part of "natural forest cycles" and ACE would like to see the Forest Service treat them as such in the revision process.
- 0820-013 ACE would like the Forest Service to look at issues related to global climate changes and past human-related activities that may have a role in current spruce bark beetle cycles in order to holistically address the issue. For example, both Bradley dam and the intertie currently in use are projects which left slash piles behind and may have contributed to the current levels of spruce bark beetle activity. Additional human interference may not have the end result desired. In fact, some studies indicate that salvage logging may slow forest recovery cycles (as reported in Beschta, R.L. et
- 0820-020 Although over 90% of the fires started within the Chugach are caused by humans, ACE recognizes the beneficial role fire can play in forest ecology. ACE also recognizes the destructive potential of fires in inhabited areas affected by spruce bark beetles. Although ACE believes the forest will regenerate fine on its own, we recognize there may be some areas where fire would be of benefit. ACE would like to see the Forest Service analyze fire potential as its primary agent of forest regeneration on the Kenai Peninsula, where the vast majority of human inhabitants live within the forest. The Copper River area has seen a significant increase in beetle activity over the last few years.
- 0820-021 ACE would like the Forest Service to evaluate fire over the rest of the forest f ACE would like the Forest Service to map out areas of concern where fuel load is particularly high and/or where there are inhabited structures. Where a fire danger is high closest to communities, ACE would support selective logging to create shaded fuel breaks. However, using salvage logging as a way to address fuel loads could actually contribute to uncontrolled fire, as has been witnessed the past few summers with both Granite Creek and Crooked Creek fires ACE would like the Forest Service to map out areas of concern where fuel load is particularly high and/or where there are inhabited structures. Where a fire danger is high closest to communities, ACE would support selective logging to create shaded fuel breaks. In addition, ACE would like to see classification of lands mapped out. We believe economics must be weighed when addressing fire. To give the backcountry the same level of fire protection as are afforded to
- 0821-017 The "forest health" approach of salvage logging to "solve" the spruce bark beetle infestation must be rejected. There is no evidence that logging slows the spread of spruce bark beetles nor is it the best alternative for forest regeneration. The Forest Plan is an excellent opportunity to gather the best scientific information on the spread and control (if possible) of spruce beetles, the effect of beetle-killed trees 66 forest biodiversity, the role of spruce beetles in the forest ecosystem and opportunities for considering non-logging approaches for human safety and
- 0822-004 The health of the timber stands on the Chugach, particularly on the Kenai Peninsula are of great concern to many people in southcentral Alaska. The Chugach National Forest must institute forest management prescriptions to restore the health of those white spruce stands that are being decimated by the spruce bark beetle. Areas deforested by the beetle infestation must be replanted and timber stands that are threatened with infestation must be allowed to be harvested commercially prior to being killed by the insects. Areas on the Kenai Peninsula that are being actively managed for forest products are regenerating quite successfully back to white spruce. Those areas hit by the bark beetle are coming back as grass lands with losses in old growth characteristics, wildlife habitat and recreation value. It is ironic that twenty years from now the only green forest remaining on the Kenai Peninsula will be those areas
- 0826-002 2. Forest health is a big problem on the forest and will likely be for some time to come. The plan needs to address what comprehensive pest management techniques will be utilized to mitigate or restore the areas of the forest that have been impacted by the spruce bark beetle. Restoration of damaged ecosystems have become an accepted practice in the Pacific Northwest where funding and staff resources are being allocated to salmon and stream restoration projects. I think a similar program needs to be developed for areas of the forest that have been impacted

Comment # Comment

- 0837-024 - Land use designations should allow for optimum flexibility in addressing insect and disease infestations.
- 0837-026 - Additionally, the results of the newly initiated insect infestation study for the Kenai Peninsula should be integrated within the CNF revision. It is to be finalized by June, 1998. This study will provide a unique opportunity for the major public land owners in the peninsula (Borough, State, US Forest Service) to develop an common understanding of the infestation problem, how it may affect the holdings of each entity, and how each agency can contribute to an integrated solution to this pervasive problem.
- 0860-026 Harvest beetle kill before its too late
- 0860-047 Allow beetle kill to rot
- 0860-094 Allow beetle to run its course and salvage small portion
- 0860-105 Prudent harvesting of beetle killed timber
- 0860-110 Natural forest (i.e. beetles and fire allowed to take their natural course)
- 0860-126 Worst Spending millions trying to control the beetle
- 0860-132 Beetle infestation rampant
- 0860-139 Massive areas of dead trees and fire
- 0880-021 ? Adopt the State Fire Management Plan