

Date submitted (Alaskan Standard Time): 10/26/2018 12:00:00 AM

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Comments:

Dear Planning Team,

Attached are the October 26, 2018 comments of the Alaska Quiet Rights Coalition on the Chugach National Forest's draft Land Management Plan and DEIS. Also attached is Trustees for Alaska's August 9, 2016 letter concluding that purely recreational snowmachining in Wilderness is illegal under the Wilderness Act notwithstanding Section 1110(a) of ANILCA.

Sincerely,

Brian Okonek, President

Dear Forest Planning Team,

Thank you for the opportunity to submit comments on the draft Environmental Impact Statement (DEIS) and draft plan for the Chugach forest plan revision. Founded in 1996, AQRC's mission is to maintain and restore natural sounds and natural quiet in Alaska through advocacy and education for the benefit of people and wildlife. More particularly, we're dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, visitors, future generations, and wildlife. We believe that natural sounds and natural quiet should receive the same consideration given to other ecological values, such as clean air and water, fish, wildlife, soils, vegetation, scenic beauty, and wilderness character. Although there are many places in Alaska that look the same as they did 200 or more years ago, very few sound as they did just 20 or 30 years ago.

In addition to protecting ecological values like the ones listed above, one of AQRC's specific goals is a fair and equitable overall balance on the public lands between those managed for motorized recreation, and those managed for quiet, truly traditional forms of recreation like hiking, snowshoeing, cross country skiing, canoeing, and kayaking.

Wilderness. The Chugach contains some of the wildest public lands in the nation. It's a great disservice to the American people, and to our visitors, and an embarrassment, that the Chugach includes not a single acre of designated Wilderness. The Last Frontier? AQRC supports Alternative D (with the addition of Nellie Juan Lake, and EVOS lands within the Wilderness Study Area (WSA) boundary). This alternative would recommend to the Congress for Wilderness designation the greatest percentage of WSA lands of any of the alternatives. We would like to thank the Forest Service for responding to earlier public comment with an increased Wilderness recommendation within the WSA.

Recreational snowmachining in Wilderness. Designated Wilderness provides many undeniable and very important benefits. But in the Chugach, Wilderness, and lands to be managed as Wilderness, would not include a major benefit enjoyed by those recreating in lower 48 Wildernesses—quiet recreation free of the

impacts and conflicts created by recreational snowmachining. This is due to a badly flawed interpretation of Section 1110(a) of ANILCA. That interpretation would allow recreational snowmachining on WSA lands that are to be managed as Wilderness, and even on lands that the Congress might officially designate as Wilderness in the future.

This is a very significant mistake. The Congress never intended, when it acted almost 40 years ago, that Section 1110(a) would sanction recreational snowmachining in Alaska when it is prohibited in designated Wilderness in the entire rest of the country—that is, prohibited on public lands that most people would characterize as considerably less wild than those in Alaska. Recreational snowmachining is not a traditional activity; hunting, fishing, trapping and berry picking presumably are. Congress intended that snowmachines could be used for transportation to engage in those traditional activities—but not for purely recreational riding itself. This is the interpretation the National Park Service adopted for the Wilderness of Old Denali National Park, and it should be adopted by other federal land managing agencies in Alaska as well. If recreation is included in the definition of traditional activities, it leaves virtually no known use of snowmachines restricted, and leaves the qualifier “[d]for traditional activities[r]” without meaning. We have attached for the record a letter dated August 9, 2016 submitted by the public interest environmental law firm Trustees for Alaska on behalf of seven conservation organizations during the public comment period for Wrangell-St. Elias National Park and Preserve’s Backcountry and Wilderness Stewardship Plan’s Proposed Action. We believe that the 1110(a) arguments and conclusion made in that letter apply equally to the Chugach National Forest and this planning process.

Recreational snowmachining is hardly a primitive form of recreation; there's nothing wild about this intrusive, noisy, powerful modern technology. It's ironic, and very discouraging, but many Alaskans seeking a true, reasonably accessible Wilderness experience in the U.S. would have to travel to Wildernesses in the lower 48 to find it.

The wisdom of excluding recreational snowmachining from the definition of traditional activities becomes more apparent every year, as snowmachine technology improves dramatically and snowmachines seem to be able to go almost anywhere, and at high speeds; and as recreational riding increases substantially throughout the country, including many parts of Alaska. As a result, the adverse impacts and conflicts created by recreational snowmachines continue to grow substantially. Furthermore, the fact that snowmachines rarely need to stay on trails but can, and generally do, roam cross country, means that they can be encountered nearly anywhere, making it virtually impossible to plan a non-motorized excursion free of encounters and conflicts with snowmachines unless lands closed to recreational snowmachining are designated (this would not be as true, for example, of motorboats, which are restricted to a waterbody).

And there are other adverse impacts from recreational snowmachining besides noise. These include ecological impacts like air and water pollution, snow compaction and damage to vegetation, and the disturbance of wildlife; and social impacts such as the marring of scenic beauty-- the tracking, often extensive, of lakes, meadows, and hillsides, on otherwise beautiful snowscapes--and the acrid smell of snowmachine exhaust, lingering for some time at ground level on windless days. The DEIS fails to mention the impact of both winter and summer motorized use on scenic beauty.

The Chugach should encourage visitors to enjoy the Forest with muscle, rather than motorized, power; the health benefits of muscle-powered recreation are especially important at a time when obesity is a serious state and national problem.

An additional benefit of recreating on one’s own power is coming to better understand our state and nation’s history: how tough, both physically and mentally, and how self-reliant, our ancestors were. In traveling as they did one gains substantially added respect for their accomplishments in sometimes very harsh environments and conditions.

There are millions of acres of public lands in Southcentral Alaska that are managed for recreational snowmachining; in fact, the vast majority of those lands--very unfairly--are managed for snowmachining. Many is not most quiet recreationists would like to ski or showshoe on these lands but are displaced by the noise and other impacts of recreational snowmachines. For the most part, there’s no such thing as “[d]sharing[r]”, or multiple use, of trails or areas. Motorized use dominates, and the quiet user is displaced and will be undercounted in surveys of who’s recreating on the Chugach. Do the visitor

satisfaction surveys (see draft plan, p. 88) reach the recreationist who would like to use and enjoy the Chugach but has been displaced? Quality quiet recreation requires quiet: areas set aside for quiet recreation that are screened from recreational motorized use either topographically, with ridge separation, or separated in time, with year on, year off, or half year on, half year off, zoning.

The Chugach should abandon its misinterpretation of 1110(a) (a provision which is in fact a special, very limited provision for snowmachine use); prohibit recreational snowmachining on lands managed as Wilderness; and instead provide on those lands some of the few opportunities in the region for quality non-motorized winter recreation.

Wilderness character. Wilderness character, the primary purpose of Wilderness under the Wilderness Act, is just as important as the more tangible values of Wilderness. Wilderness is a state of mind. Managing the WSA so as to retain its wilderness character is clearly the wisest, most responsible policy, and one followed by the Forest Service for over 30 years. Managing, as proposed, to retain only [ldquo]existing character[rdquo], a far weaker and less well-defined standard, is a huge step backward.

Kenai Peninsula Wilderness. In addition to the recommendations for the WSA, significant representative blocks on the Kenai Peninsula should also be included in the Wilderness recommendation. Wild places that are accessible from the road are an extremely valuable resource--in Alaska just as much as in the lower 48. For many, if not most, people, getting into Prince William Sound is not something that can be done on a regular basis. A visit there is special. But for a large percentage of both Alaskan residents and our visitors, the Kenai Peninsula is highly accessible and can be enjoyed frequently without having to expend large amounts of time and money or own a boat or plane. What a huge benefit it would be if a significant portion of the Peninsula could be enjoyed as Wilderness.

Natural Soundscape (natural sounds and natural quiet). Many of us remember very well when it was quite unusual to be disturbed by mechanical noises in the outdoors. There was quiet, which was beautiful in itself, and there were beautiful natural sounds, like falling snow and birdsong. These days, that quiet and that chance to hear natural sounds are all too frequently shattered. As we said above, there are many places in Alaska that look the same as they did 200 or more years ago, but very few that sound as they did just 20 or 30 years ago. But "peace and quiet" are still highly valued, and frequently mentioned by visitors to the public lands both in Alaska and Outside as one of the outstanding and most appreciated characteristics of those lands. The Chugach National Forest should seek to protect those values, and where necessary, restore them. And as we also said above, the natural soundscape is just as deserving of analysis and protection as other ecological values that are routinely assessed.

Unnatural noise can harm human health, both mental and physical. Natural quiet and natural sounds can be soothing and can benefit human health. And unnatural noise can harm wildlife as well; one of the best examples being how this can disturb songbirds during the breeding season.

But beyond any measurable demonstration of health effects, many people visit the public lands, especially Wilderness or lands that are to be managed as Wilderness, as a refuge from noisy, busy, crowded daily lives. This certainly includes tourists, whether from Alaska, from other parts of the nation, or from other countries (and these tourists can generate significant economic benefits). Most of them, we suspect, are not only hoping, but expecting, to be able to hear and enjoy natural sounds, and to experience natural quiet.

We weren't able to find anywhere in the DEIS any mention of the natural soundscape, natural sounds, and natural quiet. This is a glaring and serious omission. The Chugach Forest Plan should assess the existing natural soundscape, and how it would be impacted by the various alternatives. As far as we know, the

Chugach does not have a Natural Soundscape plan. If this is true, the Forest Plan should require that one be developed, and the state of the soundscape should be assessed and then closely monitored to not only to protect natural sounds and natural quiet, but to restore them where appropriate.

Forest Monitoring Program. Keeping the WSA in this program is essential. How will the Forest Service fulfill its responsibility to manage the WSA so as to maintain its eligibility for designation by the Congress as Wilderness if it doesn't know what's happening there?

Winter-specific ROS. Another significant omission is the lack of a winter-specific Recreation Opportunities Spectrum category. Such a category would be a recognition that access and experiences on the Forest change in the winter, and would better protect quiet recreation.

As we said above, there is a gross imbalance between the percentage of public lands managed for motorized recreation and those managed for quiet, human-powered recreation. Although the situation on the Chugach is fairer than on BLM and State lands, there is still a significant imbalance, and it favors the type of recreation—motorized—that creates the most conflicts and impacts. While the Kenai Winter Access Plan improved this situation somewhat, the plan allocated considerably more attractive, popular trails and areas to snowmachining (for example, Lost Lake) than to quiet recreation, and there is a great deal of room for further improvement. More trails and areas, including on the Kenai, should be placed in a Primitive or Winter Semi-Primitive Non-motorized ROS.

The DEIS says that lands currently open to motorized recreation will remain open (p. 132). While the plan might not in itself make changes, that should not be the end of it: a subsequent Travel Management Plan should provide the opportunity to create a fairer balance on the Chugach by closing some of the lands currently open to motorized recreation. Why can't the Lost Lake area, for example, be free from recreational snowmachines, at least every other year, if not permanently?

We were baffled by the discussion of recreation conflicts at page 143 of the DEIS. Public comments clearly identified conflicts between motorized and non-motorized users not only for watercraft but also for both terrestrial and aerial motorized craft.

Inventoried Roadless Areas. These areas provide a wide range of valuable benefits and deserve special protections.

Recreational chainsaw use. This is not a trivial problem. On many beaches in western PWS, recreational chainsaw use is seriously degrading natural, scenic, and wilderness character and needs to be addressed. Another significant effect is noise pollution in areas that should be providing a relatively quiet refuge, thus spoiling the recreational experience of other visitors.

Summer ORV use. The Chugach deserves substantial credit for significantly limiting summer ORV use. Such use creates social impacts like noise pollution, scenic degradation, and loss of natural and wilderness character, as well as a raft of ecological impacts like disturbance of fish and wildlife and damage to their habitat, air and water pollution, damage to soils and vegetation, and degradation of the natural soundscape (which includes both natural quiet and natural sounds).

Decision making. Many, if not most, recommendations on where recreational motorized use should be allowed seem to be based on where existing use occurs (see, e.g., DEIS Table 139). This, as a general rule, does not seem to be an appropriate criterium. The Service should look at all of its lands and consider from both a social and ecological standpoint where recreational motorized use should be allowed. There will be locations where such use exists but shouldn't, either for ecological reasons, or because the general imbalance in favor of motorized use, and questions of fairness, dictate that the area should be managed for quiet recreation.

Helicopters, airboats, jet skis, and drones. These four forms of recreational transportation are even more obtrusive than others. Helicopter noise, because of its special character, and the association of these craft with war and death, is eerie and especially disturbing. Helicopter skiing is already allowed on too much of the Chugach, and should not be allowed to increase. Helicopter assisted hiking is much less entrenched, and should be nipped in the bud before the constituency for it grows any greater and its regulation becomes more difficult.

Airboats are extremely loud and obtrusive, and can do substantial ecological damage; for both social and ecological reasons they should not be allowed on the Forest. Other types of motorized watercraft are suitable for most legitimate, non-damaging purposes.

Jet skis are not only very loud, but their operation often results in frequent changes in pitch, which makes them even more disturbing. Also, like airboats, they can do substantial ecological damage. They should not be allowed on the Forest.

Drones, somewhat like helicopters, are not only obtrusive and disturbing, but can be disturbing in an eerie sense: individuals, like Big Brother, spy (presumably not intentionally, with their cameras on recreationists who are seeking, and think they've found, solitude and privacy. Natural and wilderness character are destroyed by this most modern of modern technologies. The recreational use of drones should be prohibited on the Chugach.

Submission of comments. We hope the Forest Service is not deliberately trying to discourage comments, but the effect of its failure to include an email address as a means of submission is likely to have that effect. Not only is submission by email the most popular way to comment, but there are going to be those of us who want to include an attachment but don't know how to use the method provided on the web. The Chugach should be fair and encouraging and provide an email address the next time comments are solicited.

Thank you again for the chance to comment on this very important planning process for one of the jewels of the National Forest System.

Sincerely,

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