



# **ALASKA CENTER *for the* ENVIRONMENT**

807 G Street, Suite 100 Anchorage, Alaska 99501

907-274-3639 [eric@akcenter.org](mailto:eric@akcenter.org) [www.akcenter.org](http://www.akcenter.org)

Monday June 2, 2008

Monica Alvarez  
Chugach Planning Project Manager  
Alaska Department of Natural Resources  
550 West 7<sup>th</sup> Avenue, Suite 1050  
Anchorage, Alaska 99501

## **Re: Scoping Comments Chugach State Park Master Plan Revision**

Dear Ms. Alvarez,

Thank you for the opportunity to submit comments on the Chugach State Park Master Plan revision. Alaska Center for the Environment is a non-profit environmental organization, founded in 1971, based in Anchorage with over 6,000 Alaskan members. ACE works to enhance Alaskan's quality of live by protecting wild places, fostering sustainable communities, and promoting recreational opportunities. It is safe to say that the majority of our members value Chugach State Park, frequently use the Park, and hope that the Division of Parks and Outdoor Recreation maintains the wild character of Chugach State Park.

While we understand that it has been nearly thirty years since the Division has last considered an all encompassing rewrite of the master plan, we believe that opening the entire plan to revisions may be a mistake. As we have stated in previous letters to the Division, we believe that a wholesale revision of the master plan is unwarranted, unneeded and potentially threatening to the Park. Current management has seemed to work. After reviewing the scoping comment summary, very few complaints concerning Park management were heard during the scoping meetings.

None-the-less, we realize that the Division has moved forward with the planning schedule. ACE submits these comments in hopes that the planning team moves ahead with the drafting of management alternatives with great care. The end result should be a plan that protects the integrity, legacy and wilderness character of Chugach State Park.

This idea of measured, careful planning was a main focus of several prior planning documents for Chugach State Park. The 1980 Master Plan, the 1986 Trail Plan, and the more recent 2002 Access Inventory all did a good job of addressing this delicate balance of managing a wild park in close proximity to a large metropolitan area. We simply ask that the Division respects these principles when rewriting the plan.

In the introduction of the Chugach State Park Master Plan, former Division Director Chip Dennerlein's ideas on Park management planning still ring true: an accessible wilderness, with wonderful natural values, coupled with balanced management for the

fragile Park. Our concerns are that the planned revisions honor and uphold these ideas. Unfortunately, the draft goals and objectives, and purpose and need documents distributed at the scoping meetings were vague and confusing.

The green paper, a purpose and need document, is almost entirely focused on development in or around the Park: “development of facilities”, “development of trails, and “development of access points.” This was the only information that was distributed to the public at the scoping meetings; the Division gave the impression that this rewrite was primarily focused on development.

In addition the Draft Chugach State Park Management Plan Goals and Objectives fall short in meeting the legislation that created the Park. While we are happy to see protection being one part of your goals (Resource Goal), the legislature called for the protection of water, protection of areas with unique and exceptional scenic value, and the protection of wilderness characteristics. These other legislatively mandated protections should be added to your list of goals.

There are other weaknesses in your Goals and Objectives. Under Access, the Division’s objective of access points every ¼ mile along the park boundary is ambitious and may not be feasible. We would also suggest that an additional objective should be to work with, or consult with, the Municipality of Anchorage to achieve enhanced public access.

The Recreation Goal states that the Division hopes to “keep pace with the needs and diversity of Alaskans and visitors”, our view is quite the opposite, that visitors to the Park should check their needs and desires at the park boundary. This is a park unit, and to steal yet another line from Director Dennerlein, “Chugach State Park is not intended to provide all recreational opportunities for a population of infinite size. The Park is too fragile.” There are hundreds of thousands of acres of other State lands in Southcentral Alaska that can meet the needs of the different types of recreationalists.

Furthermore, the objectives go on to address even more development of trails and facilities. As Anchorage and the surrounding areas move closer to the Park the need for parkland will increase, not decrease. The fragile nature of the Park, as it was in 1980, will increase as use increases. The Division should be prepared to tackle this management hurdle of protection with balanced recreation needs.

ACE has developed five points to steer you through the Chugach State Park planning process:

### **Wild Character**

Chugach State Park is a wilderness at our backdoor, and is high on the list of reasons to live in Anchorage. Alaskans value clean air, clean water, beautiful scenery, and wide open spaces. The Park provides all of these, along with a reprieve from the rush of modern Alaska living. The Park’s wilderness zone protects the values of solitude, challenge, study, inspiration, and primitive recreational opportunities.

The Division should do its best to maintain this wild character. Long accepted boundaries between recreation, natural, and wilderness zones should be maintained. No major changes to the definitions of these zones should be made, nor should the compatible activities for each zone be changed. ACE supports the current park management of zoning.

Very few parks in the Lower 48 have legislatively designated wilderness areas. The Park's wilderness zone should be managed similar to other designated wilderness areas on State land(see Kachemak Bay State Wilderness Park), to facilitate the "interplay of natural processes large enough and so situated as to be unaffected, except in minor ways, by what takes place in the non-wilderness zones around it, a physical condition which activates the innermost emotions of the observer and where development of man-made objects will be strictly limited and depend entirely on good taste and judgment so that the wilderness values are not lost. "

### **Access**

Equal and easy access to the Park provides users with a sense of freedom and independence. New access points should be made available around the Park's boundary. Parking and trailhead development should be made with caution, taking into account the needs of the neighborhood residents. With the growing interest and popularity of the Park it will be important to accommodate this access need.

### **Recreation**

Thanks to Chugach State Park the opportunity to be inspired and challenged by unparalleled outdoor recreation in the wild makes living in Anchorage unique. Today there is an accepted balance between the different recreational users. Future Park management should not stray too far from this compromise.

The Generally Allowed Uses on State Land allow for limitless opportunities for motorized recreation on other lands. Again, the Park is not meant to accommodate all users, the opening up of more terrain for motorized use, and potential damage, is not acceptable. There should be no increase in the areas that are open to snowmachines or ATV use.

### **Wildlife**

Chugach State Park's wildlife is a rewarding part of living so close to such a wild place. It is a thrilling and satisfying experience to see animals in the wild. Irresponsible trapping has the potential to put Park resources at risk. Habitat fragmentation due to roads, buildings, or motorized disturbance also puts wildlife resources at risk. The Division should use sound science, and responsible decision making when addressing the management of Park wildlife.

The protection of wildlife and their habitat is an important element of the Park. Please see the detailed comments regarding trapping in a letter dated May 23, 2008 signed by ACE, Defenders of Wildlife, Alaska Wildlife Alliance, Bill Sherwonit and Tom Meacham.

**Protection**

In order to protect Chugach State Park's integrity, legacy and wild characteristics, it is necessary to develop a park plan that upholds strong conservation values. This includes respecting the balance of managing a park so close to urban life, preserving part of the natural environment of Southcentral Alaska. Sorry to say, during this scoping process the information, communication, and documents from the Division to the public is lacking in its conservation ethic.

We believe that current Park management is sound and consistent with the needs of Chugach State Park and its users. During the rewriting of the Master Plan the Division should lighten up on the development speak, and detail real conservation management ideas. Determining the future use of this area is critical, and should be done with the highest of care.

Thank you for the opportunity to comment on this important process. We look forward to working with the Division of Parks and Outdoor Recreation on the drafting a management plan that fully and comprehensively protects Chugach State Park for generations to come.

Sincerely,  
Eric Uhde  
Public Lands Advocate  
Alaska Center for the Environment  
807 G Street, Suite 100  
Anchorage, Alaska 99501