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*Handwritten:* 10/9/18 rec'd

September 28, 2018

Terri Marceron, Supervisor  
Chugach National Forest  
US Forest Service  
161 East 1st Street, Door 8,  
Anchorage, AK 99501

re: Comments on the 2018 Draft Land Management Plan and DEIS

Dear Supervisor Marceron:

Thank you for the opportunity to comment on the 2018 Draft Land Management Plan ("Plan") for the Chugach National Forest and its accompanying Draft Environmental Impact Statement ("DEIS").

I represent the Board of the Alaska Mountain and Wilderness Huts Association ("Alaska Huts"). Our mission is to "include Alaska's backcountry in a worldwide tradition of places in which hikers and skiers can travel hut to hut, and provide warm comfortable huts in inspiring settings to foster camaraderie and promote wilderness education and stewardship." We currently operate a cabin at Manitoba and we eventually want to develop the Glacier Discovery Hut-to-Hut System from the Alaska Railroad Whistlestop at Spencer Glacier to sites near Bartlett Glacier and Trail Glacier and ending at the Whistlestop at Grandview. In developing these projects, we wish to preserve their "inspiring settings."

We are particularly interested the Plan's proposed management guidance for the two areas where these projects are located.

#### **Manitoba Cabin**

The Manitoba cabin is located on Alaska state land near mile 48 of the Seward Highway on Canyon Creek north of the Summit Lakes. Alaska Huts restored the existing cabin and built two yurts on the property to serve 16-18 users in a communal setting where guests share meals and sleeping accommodations. It represents a kind of model for huts that we want construct for the future Glacier Discovery Hut-to-Hut System. Today Manitoba attracts a clientele of backcountry skiers during the winter and we accommodate hikers and campers in the summer. Year round, we also serve recreation and outdoor non-profit and education groups in keeping with our mission.

The lands around the Manitoba Cabin must be managed to avoid potential recreational user conflicts between winter non-motorized and winter motorized uses. Skiing and

snowmachine use cannot share same space and the presence of snowmachines in the area will also disturb our guests' enjoyment of the quiet and solitude that is part of their experience of the Manitoba Cabin.

For this same reason, helicopter operations in this area would also negatively impact the qualities we would like to see preserved at Manitoba. While some of our clientele might seek out helicopter skiing opportunities, Manitoba probably would not serve as a convenient access to these operations. Furthermore, our mission is to serve more than those who can afford helicopter skiing and instead serve those who cannot afford helicopter skiing and who are interested in traditional backcountry ski experiences. Most importantly, we wish to continue to serve those who use the Manitoba Cabin as a place of quiet and natural beauty no matter what recreation activity they pursue while staying there. The potential to introduce newcomers to winter mountain experiences would be significantly diminished by the noise of helicopters passing nearby.

This area, as well as most of the corridor along the Seward Highway, was designated as "Fish, Wildlife, & Recreation Prescription" in the 2002 Land Management Plan. In the 2018 Land Management Plan it will be designated as Management Area 8 "Front Country Areas" and, for the most part, recreational uses currently permitted in around Manitoba will be the same under this new Front Country Areas designation.

We understand that specific decisions taken by the Forest Service historically have prohibited motorized winter access on Forest Service lands near Manitoba and that these restrictions are unchanged by the 2018 Land Management Plan. While the current management of the Forest Service lands around Manitoba allows recreational activities that happen to conform to our mission, we are concerned that Plan does not foreclose future decisions under the "Front Country Areas" designation to increase motorized winter transportation and permit helicopter operations. We would emphatically oppose such decisions.

### **Glacier Discovery Hut-to-Hut System**

The Glacier Discovery Hut-to-Hut System ("Hut System") faces a different set of conditions than Manitoba and we acknowledge that the Forest Service recognizes these differences in its Management Area designation in the Plan. Particularly, winter outdoor recreation has substantially evolved and grown in the last few years in the Spencer Flats area. When weather and snow conditions allow, cross-country skiers, fat-bikers, and snowmachiners are now accessing the area in ever increasing numbers. For our part, the Spencer Flats hut would offer such recreationists a perfect destination and provide an opportunity to running our proposed Spencer Flats hut throughout the winter<sup>1</sup>

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<sup>1</sup>In its 2015 Non-Profit Business Plan submitted to and accepted by the Forest Service, AK Huts did not evaluate nor propose operating the Hut System during the winter. The winter recreational activities and non-motorized and motorized winter access that is allowed by the 2018 Land Management Plan means that AK Huts may someday be permitted to offer guests winter season accommodations.

Permits granted to helicopter skiing operators to access both the Spencer Flats and Bartlett Glacier huts sites could also materialize in the future. Helicopter skiing might be a desirable additional activity available to our guests and extend the time we might operate the huts when surface access is limited by bad snow conditions. Thus, we face the challenging choice to acquiesce to the desire of some of our guests who favor motorized and helicopter access versus advocating on behalf of other guests who require quiet and solitude.

The Hut System lies within an area that is designated in the Plan as Management Area 4 "Backcountry Areas." It is our understanding the Plan also says that the "the recreation class" in the Spencer area "will change from semi-primitive motorized to roaded natural." This recreation class acknowledges that the area "has a higher level of recreation development, larger number of parties encountered per day, and a more roaded environment than is appropriate for a semi-primitive motorized class." Therefore, snowmachines may continue to travel to the Spencer Flats. The rest of the Huts System remains under more the original restrictive recreation class and that any current prohibition on motorized transportation, including helicopter operations, may only be lifted by an authorized use permit. The Plan does not change the status of the Trail Glacier hut site at the edge of the Bear Core Habitat area. The construction of this hut was allowed as part of the Alaska railroad Whistlestop project approval.

Any future expansion of motorized winter access and helicopter operations could be a problem for us. Justification for issuing use permits that changes the current situation must conform to the Plan requirements and management objectives, any current existing regulation, and previous Forest Service decisions. Be assured we will weigh-in vociferously if the Forest Service entertains the award of such use permits. We will be most concerned that the Forest Service preserve the conditions that characterize the Plan's definition of Management Area 4 Backcountry Areas.

Providing our users access to quiet and solitude and an experience of untouched natural settings is a core value imbedded in the mission for AK Huts. We are grateful for the spirit of partnership that we have forged between the Forest Service and AK Huts and that the mission of AK Huts is not inconsistent with appropriate management guidance for the Chugach National Forest. If you have any questions or clarifications, please feel free to contact me at 907-952-2431 or write to my personal email address at [kbanksak@gmail.com](mailto:kbanksak@gmail.com).

Sincerely,



Kevin Banks  
President

cc: Amy Dalton  
Executive Director, Alaska Hut