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Comments: Terri Marceron2/3/16

Chugach National Forest's Supervisor's Office

Attn: Forest Plan Revision

161 East 1st Street, Door 8

Anchorage AK 99501

Dear Terri,

Please accept our comments on the proposed Chugach National Forest Land Management Plan revision. Alaska Pacific University has operated on the Forest running permitted educational and research programs since at least the early 1990's. Our students and faculty have benefitted from both the natural and human resources associated with the Forest. In turn their research and programs have contributed knowledge and understanding about the Forest and its human activities.

APU's Outdoor Studies program is a primarily wilderness, non-motorized program with courses running from one to twenty one days. We have sea kayaking courses in western Prince William Sound, ski/winter camping classes in the Kenai Peninsula, pack rafting in Turnagain Arm area, and avalanche courses and research in the Turnagain Pass area. Thus we are dependent on quality wilderness.

We support the proposed plans goals; especially those encourage youth to use the Forest. In general we appreciate the plans attempt to balance the many uses and users of the Forest.

However we request that the plan concretely support wilderness values where those values exist. For instance we request that all management areas in the Nellie Juan Wilderness Study Area be classified as Primitive. We feel if and when Congress designates Wilderness in the WSA all of the WSA should have the opportunity to be classified as Wilderness, in this case a "Primitive" classification. Additionally we support the continued allocation of motorized and non-motorized use in Turnagain Pass and Resurrection Pass. We request the consideration of additional non-motorized areas in the Kenai.

The WSA should be managed under the highest standard, that being the Wilderness Act of 1964 with provisions according to ANILCA. Besides aesthetic and commercial reasons to maintain wilderness values it is important to give Congress the opportunity to study and consider the WSA for Wilderness in the most restrictive sense, generally considered the '64 Wilderness Act.

For example the plan seems to classify many areas on adjacent activities. We urge that ROS classifications be based on activities on the land itself. If the looser standard would be applied then many congressionally designated Wilderness would not be eligible.

We ask that the management areas be classified on their own merits, not influenced by adjacent activities. (Table 7, CNF Wilderness Area Inventory and Evaluation).

Here are some other comments:

Social Economic Characteristics: Emphasize the value of commercial and noncommercial recreation related to the forest and wilderness values.

PWS Geographic Area: (p. 15) Add comment that there are (anecdotally) signs of increase in wilderness based

winter recreational use such as backcountry skiing that are wilderness based.

Standard FW G2 ST 10: (P. 37) Temporary camps should be completely removed or stored out of sight at the end of seasonal occupation.

Guideline MA 1-GL-03: (P 44) Administrative actions should not have any impacts on wilderness character, not done in a way that "minimizes" impacts. The WSA should be managed in accordance to Regional Forest policy.

Standard MA 1-ST-03: Banning "Recreation and Competitive Events" is vague. We suggest adding some examples, or just stick to competitive events.

Research Areas: (p. 49) This is an intriguing idea and we propose language that directs the Forest to explore more such areas. For example any area with a shrinking glacier has tremendous research opportunities, eg: Barry Arm and Columbia Bay.

We suggest adding to the list recommended Wild and Scenic Rivers, particularly the Copper, Coghill, Bering and Martin rivers.

Thank you for taking our comments and suggestions. Our program relies on quality wilderness for both educational and research activities. We appreciate our good working relationship with the Forest staff and administrators and look forward continuing that partnership.

On behalf of the whole faculty and student body of APU Outdoor Studies department,
Sincerely,

Eeva Latosuo
Associate Professor
Co-Chair of Department
Outdoor Studies
Alaska Pacific University