

Data Submitted (UTC 11): 2/19/2016 8:12:47 AM

First name: John

Last name: Wolfe Jr

Organization:

Title:

Comments: Greetings. Thank you for the opportunity to comment on the Proposed Revised Land Management Plan. I am a life-long user of the National Forest and co-author of the trail guide 55 Ways to the Wilderness in Southcentral Alaska, which includes several trails in Chugach National Forest on the Kenai Peninsula and near Valdez. The following are thoughts on several topics, in no particular order.

- Forest trails are highly-valued, and the final plan should prioritize the continued use of existing trails and completion of planned trails or improvements, such as the Glacier Discovery Trail and Whistle Stops. The Sustainable Infrastructure objective includes several specifics, and completion of the trail connection between the Whistle Stops at minimum should be included, if not the entire Whistle Stop trail system. There is too much infrastructure in place (but disconnected) and too much popularity evident in the area to not include this trail segment as an objective with a timeline.

- I am sympathetic with the notion that the Wilderness Study Area is difficult to manage in an era of declining budgets and increased recreational use. I'm sure the EIS will examine alternatives for different amounts of Recommended Wilderness. It is appropriate that the full 1.9 million acres to be Recommended and that other areas such as outlying islands and high-mountain and icefield areas be added as well. In select areas or bays, it is worth considering a carefully crafted compromise that might allow "hard-hit" areas to be Not Recommended in a buffer area of say 50-100 ft from the shore and Recommended inland/uphill of that line, rather than throw in the towel entirely on vast areas of Wilderness. Because the water is not Wilderness anyway, moving the boundary back a few feet to allow for more hardened sites would potentially also allow for the less-accessible steep areas to remain Recommended. Similarly, the presence of boats in an inlet or at Columbia Glacier should not disqualify vast surrounding lands from Recommendation. Wilderness in many places (e.g. Denali Park road) has fingers of non-Wilderness inserted. It is not the ideal, but it should not work to keep adjacent areas from being Recommended as Wilderness.

- The Forest Service needs good partners, and the plan should recognize a distinction between commercial operators seeing profit and non-profit organizations operating with the aim of providing public benefits that the Forest Service could provide but may no longer have full funding to provide--trails, cabins, campgrounds, educational programming, etc. by groups such as Alaska Trails, Alaska Huts, ski clubs, outing clubs, Alaska Geographic, etc. This perhaps could be part of the otherwise well-done Forest-wide section on Sustainable Recreation Opportunities and should be integrated in the Partnerships and Collaborations objective.

- It is appropriate that the Forest continue to be managed with Wilderness in mind in PWS and with recreation as a primary management scheme on the Kenai Peninsula. However, it is also appropriate on the Kenai Peninsula to manage for preservation of the unique brown bear and caribou populations and for the desired condition of solitude when off-trail.

- As part of the endless debate over motorized and non-motorized winter recreation, there are too few areas set aside for non-motorized winter recreation. The plan should retain the Mills Creek and Center Creek non-motorized areas, and I would advocate for more time-sharing areas such as currently occurs on the Resurrection Pass Trail. It is not clear how these kinds of designations interact with the Revised Plan; it should be clear to readers.

- Without in any way diminishing existing winter non-motorized areas. it is possible the planning process could consider allowing for special management of areas designed specifically for winter motorized touring and motorized access on a designated route, with non-motorized activity outside the narrow motorized corridor. The



corridors would be designed for relatively modest-speed touring, possibly on groomed trails (partnerships needed), often pulling sleds, as family outings and as access to skiing, climbing, and other non-motorized activity, and for camping or cabin use. In the right area, it might be possible to designate a landing site for aircraft access or a geographically cohesive subarea for snowmobile 'play' off trail.

- The Front Country Mgt Area indicates that "Tourism related facilities should accommodate large groups." This sounds close to a mandate to create large tourist facilities. At the very least, this should say "may." I would feel better about Front Country if there were standards and guidelines or other indications of parameters. It seems odd that this MA would encompass Begich-Boggs level of development, highway corridors, and the wilderness at the upper ends of Ptarmigan Lake and Grant Lake without further explanation or parameters. My sense is that Front Country is applied too broadly. For example, around Hope, a corridor around the road and beginning of Res Pass Trail could be Front Country, but the mountain slopes and ridgtops would more rightfully fall under Backcountry. Entire drainage basins around Ptarmigan and Grant Lakes should not be Front Country; only the literal front parts of these areas seem appropriate to this MA.

- While I find the existing 2002 Forest Plan sometimes impenetrable, I am concerned that the Proposed Revised Land Management Plan has been over- simplified in some ways. I would hope the final Revised Plan would incorporate more habitat protection (not only is Brown Bear Core gone but it does not appear special considerations have been incorporated in the Backcountry MA, and the forest-wide goals and desired conditions, while laudable, may be overbroad and not honed sharply enough for threatened populations. It is well and good to have a desired condition that sounds like brown bears and caribou roam freely in their historic numbers, but they already do not, and the plan does not seem to acknowledge this). Similarly, I would hope the final plan would provide clear parameters for public uses while still providing managers reasonable flexibility.

- The definition of Forest Service Recreation Cabins is quite specific to the Forest Service, while definitions of day use areas, campgrounds, and other facilities are defined more generally and appear to allow for facilities that could be provided by others, e.g. under special use permit. Given that there is an active proposal for huts to be built and managed by the non-profit Alaska Huts Association on the Glacier Ranger District, this definition should be broadened to include cabins provided by others and made consistent with other definitions, or the "special use hut-to-hut" concept should be reinstated from the 2002 plan. I worked with Alaska Huts at that time, and the designation was inserted in recognition of a legitimate distinction between Forest Service recreation cabins and multi-party huts.

- The Forest-wide Scenery objective should be reworded so it does not imply that volume of viewers is the driving force behind what should be retained as High Scenic Integrity. Many areas, Wilderness especially and many backcountry areas, may not be often viewed but should have High Scenic Integrity.

- The plan should better recognize the values of dark night sky and natural quiet and protect against light pollution and noise pollution in appropriate areas in the same way it protects other resources. Quiet is mentioned twice in the plan, never in context of protection. Lights and dark night sky apparently are not mentioned at all.

Thank you for considering these comments.