

Chugach Forest Supervisor
Attn: Draft Land Management Plan
161 East 1st Street, Door 8
Anchorage, AK 99501

October 26, 2018

Dear Forest Supervisor,

Thank you for this opportunity to comment on the draft plan and DEIS. I support a modified Alternative D that also recommends Lake Nellie Juan for Wilderness.

The Draft Forest Plan describes Recreation Opportunity Spectrum characteristics in Table 7 and in the Glossary. The Draft Plan further describes that Wilderness management and ROS class characteristics are subject to ANILCA provisions. I recommend that the Final Plan and FEIS establish modified ROS definitions and plan components that address these Alaska specific provisions. For example, standards or guidelines should address allowances for any cabin and aircraft use in Primitive and Semi-Primitive Non-Motorized ROS settings.

Standard ROS setting components include Access, Remoteness, Naturalness, Facilities and Site Management, Social Encounters, Visitor Impacts, and Visitor Management. **Appendix A** describe ROS classes with supporting plan components. I recommend that the final plan and FEIS adopt these ROS descriptions after being modified by the IDT to address ANILCA specific provisions.

I also recommend that you establish WSA standards and guidelines to protect wilderness characteristics, including undeveloped and non-motorized natural settings. In addition, the plan should adopt Alternative D ROS allocations, which appropriately applies the Primitive ROS class to all WSA lands.

Thank you for considering these comments.

Greg Warren

Appendix A. Recreation Opportunity Spectrum Class Definitions.

- Recreation Opportunity Spectrum: The Recreation Opportunity Spectrum planning framework is the recognized framework for stratifying and defining classes of outdoor recreation environments, activities, and experience opportunities through land management planning. The settings, activities, and opportunities for obtaining experiences have been arranged along a continuum or spectrum divided into six classes that are described below along with recommended plan components. The definition of each ROS class describes six setting characteristics: Access, Remoteness, Naturalness, Non-Recreation Uses, On-Site Management, Visitor Management, Social Encounters, and Visitor Impacts. The following descriptions presents plan components that link specific ROS characteristics to the appropriate ROS class.
 - Primitive: Primitive ROS settings encompass large, wild, remote, and predominately natural landscapes. Additional primitive ROS settings may be scattered across the forest, often surrounded by SPNM settings. The setting should essentially be an unmodified natural environment. Natural ecological processes exist. The area may provide for wildlife connectivity across landscapes. Primitive ROS settings contain no motorized and mechanized vehicles and there is little probability of seeing other groups. They provide quiet solitude away from roads and people or other parties, are generally free of human development, and facilitate self-reliance and discovery. Signing, and other infrastructure is minimal and constructed of rustic, native materials. Few if any management controls imposed on visitors on-site. Standards: (1) Motor and mechanized vehicles are not allowed in Primitive settings; and (2) Management actions must result in Very High Scenic Integrity. Guidelines: (1) No new permanent structures should be constructed in desired Primitive ROS settings since structures may degrade the unmodified character of these landscapes; (2) Less than 6 parties per day encountered on trails and less than 3 parties visible at campsite since an increase in the number of groups may lead to a sense of crowding; and (3) No roads, timber harvest, or mineral extraction are allowed in order to protect the remoteness and naturalness of the area. Suitability: (1) Motorized and mechanized recreation travel are not suitable; and (2) Lands are not suitable for timber production.
 - Semi-Primitive Non-Motorized (SPNM): Semi-Primitive Non-Motorized settings provide opportunities for exploration, challenge, and self-reliance. The area is characterized by a predominantly natural environment where natural ecological processes exist. The area may contribute to wildlife connectivity corridors. Closed and revegetated roads may be present, but are managed so as to not dominate the landscape or detract from the naturalness of the SPNM setting. Rustic structures such as signs and foot bridges are occasionally present to direct use and/or protect the setting's natural and cultural resources. These rustic constructed features are built

from native materials or those that mimic native materials. SPNM settings that are established through forest planning have plan components that provide for a SPNM setting for an extent of at least 1-mile (or at least ½ mile if adjacent to a Primitive setting). Standards: (1) Motor vehicle use by the general public is not allowed; and (2) Management actions must result in High or Very High Scenic Integrity. Guidelines: (1) The development scale of recreation facilities should be 0-1 to protect the undeveloped character of desired SPNM settings; (2) Less than 15 parties per day encountered on trails and less than 6 parties visible at campsite, since an increased in the number of groups may lead to a sense of crowding; and (3) Vegetative management may include very limited timber harvest for the purpose of maintaining a natural setting. Suitability: (1) Motorized recreation travel is not suitable; and (2) Lands are not suitable for timber production.

- Semi-Primitive Motorized (SPM): Semi-Primitive Motorized settings provide motorized recreation opportunities in backcountry settings. Routes are designed for Off Highway Vehicles (OHVs) and high clearance vehicles that connect to local communities, access key destinations and vantage points, provide short day trips on scenic loops or facilitate longer and even overnight expeditions. Visitors challenge themselves as they explore vast, rugged landscapes. Mountain bikes and other mechanized equipment may also be present. Facilities are rustic and are used for the purpose of protecting the setting's natural and cultural resources. Bridges are sometimes present to accommodate foot, horse and ATV traffic but are built from native or natural appearing materials that blend with the surrounding landscape and maintain the semi-primitive character of the setting. There may also be nodes that function as portals for visitors to park their ATVs and explore adjacent Semi-Primitive Non-Motorized and Primitive settings. SPM areas are ½ mile from primitive motorized roads and trails, not closer than ½ mile or better than primitive roads.
- Roaded Natural: Potential Roaded Natural subclasses:
 - Roaded Natural (RN) - Mostly equal opportunities to affiliate with other groups or be isolated from sights and sounds of human activities. The landscape is generally natural with modifications moderately evident. Concentration of users is low to moderate, but facilities for group activities may be present. Challenge and risk opportunities are generally not important in this class. Opportunities for both motorized and non-motorized activities are present. Construction standards and facility design incorporate conventional motorized uses.

- Roded Modified (RM) - Roded Modified has been used as a subclass of RN by several Forests and Regions for many years. Roded Modified has typically been defined as areas exhibiting evidence of forest management activities that are dominant on the landscape. Examples of RM include heavily logged areas, evidence of mining, oil/gas, or other minerals extraction activities.
- Rural: Area is characterized by a substantially modified natural environment. Opportunities to affiliate with others are prevalent. The convenience of recreation sites and opportunities are more important than a natural landscape or setting. Sights and sounds of man are readily evident, and the concentration of users is often moderate to high. Developed sites, roads, and trails are designed for moderate to high uses.