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Comments:

In 2.3.12, the discussion of fire doesn't adequately acknowledge the existing conditions created by many years of excessive suppression. I'd strongly suggest an additional desired condition:

FW-DC-FIRE.04: wildland fuel loads match those that would be present without human interference and to meet that:

FW-OBJ-FIRE.03 Hazardous fuel mitigation efforts directly support conditions that allow wildfire to occur and return the forest to a natural fuel load without creating significant detrimental impacts to values at risk.

Re: grizzly bear desired conditions and standards, particularly FW-DC-WLGB.01 and FW-STD-WLGB, constraining developed sites to no more than 1998 levels fails to account for either the increase in human use of the forest since then or the expanding quantity and range of the bear population.

In light of expanding human demand on the forest concurrent with and expanding bear population, I'd suggested additional DC: 04. Social acceptance of and human coexistence with bears increases with greater human education and understanding of necessary steps to limit conflict in shared human-bear habitat

Further, I'd strongly support revision of DC 01 and STD 01-04 to allow projects that accommodate increased human pressure on forest, allowing for recreational use in particular, and simultaneously accommodate needs of a bear population still expanding back into its historic range

FW-DC-CR

suggested additional condition

04. Historic travel routes are accessible to a variety of travel modes, allowing a wide range of modern visitors to experience routes and sites of cultural significance in a wide array of manners. Where possible, some historic travel routes should be maintained in a historic status but allow for motorized travel.

Reasoning: access to cultural and historical significant sites helps connect visitors to their own history and that of the forest; for many reasons, the number of people who can feasibly travel for days on end by foot or other 19th-century conveyance is very limited. Allowing motorized access on historic routes makes it feasible for a far greater range of visitors to experience those historical and cultural connections.

FW-DC-RT

Either there should be a DC for road network similar to FW-DC-RT.05, or FW-DC-RT.05 should be rewritten to reflect both road and trail systems. Reasoning: for many users, the road system is the preferred access to recreational opportunities in the forest; in some cases, the very act of traversing the road system is itself a recreational opportunity. The forest has documented a growing number of visitors, and wherever possible, the road and trail systems should allow for that growing number of visitors to have the experiences that road and trail systems built to meet that need can provide. Failure to build road and trail systems that accommodate the growing number of visitors will not only degrade the visitor experience but will also increase the stress on what roads and trails are available, as well as the resources near those roads and trails. Access to backcountry terrain is one of the CGNF's greatest assets, and allowing that access for a multitude of user groups in different portions of the forest should be a part of the plan.

FW-OBJ-RT

None of the alternatives presented match desired conditions, particularly FW-DC-RT.04; in order to "accommodate current and reasonably foreseeable recreational demands", the objectives should include an alternative to expand the road and trail network mileages to meet the demand while also maintaining existing mileage, likely in conjunction with volunteers and partnership with user groups.

Furthermore, another objective should be that "all seasonal roads and trails shall be open to travel during such dates as proscribed by the travel management process." Particularly in recent years, several roadways that serve high-demand recreational resources have remained closed beyond their opening dates due to concerns about roadbed conditions. One of the objectives should reflect (a) general maintenance of such routes so as to allow travel even in shoulder season where the ground is soggy and (b) the possibility of limited spring snow removal from roadways that are largely clear but have significant drifting in some spots, thus preventing wheeled access to significant amounts of drivable roadway. By investing in road availability, the forest will provide desired access to recreational opportunities and will also mitigate the risk of resource damage from users either being unaware of, or unwilling to obey, closures during scheduled travel seasons.

FW-DC-REC.03 "Additional recreation facilities that accommodate growing demand provide quality recreation experiences and conserve forest resources" needs an accompanying objective. I would suggest:

FW-OBJ-REC.02: Additional facilities will be constructed to meet growing user demands, in accordance with the best available science, in order to meet the desired conditions in FW-DC-REC 02 and 03.

In 2.4.19, Semi-Primitive Motorized Recreation Settings, an additional objective should be to establish at least 2 miles of road or trail in such settings for each mile of road or trail closed in a given year (including unauthorized, user-established trails), in order to rectify the current situation whereby the demand for such roads and trails is substantially greater relative to the mileage of such roads and trails versus non-motorized travel routes in the forest.

In 2.4.27, Recreation Opportunities-Ski Resorts, please consider adding an additional standard, "FW-STD-RECSKI.02: Ski resorts shall allow nonmotorized recreation, including uphill travel during both operational and non-operational seasons, whenever doing so is feasible without unduly affecting the safety of the resort's staff and guests." Given the growing popularity of "earned turns," codifying the obligation of the ski resorts operating under special-use permits to allow the people access to their forest whenever feasible will help to avoid future user conflicts.

In 2.4.46, FW-STD-BCA.01, banning all construction of new roads in backcountry areas prevents the forest from adapting to visitor demand or changing resource conditions (such as establishing a new road to spread the resource impact from an existing one). FW-STD-BCA.01 should allow for flexibility in dealing with future situations, perhaps by adding something like "except in cases where construction of new roadways is necessary to meet other objectives or standards in this plan, and where such construction can be undertaken in a manner that preserves the backcountry character of the area"

In 3.5.5, with respect to distribution of acreage on the recreation opportunity spectrum in the Absaroka-Beartooth area, none of the alternatives presented emphasize one of the most unique aspects of the Absaroka-Beartooth area: outside of the designated Wilderness area, it is one of the few places in the continental US where one can arrive in a truly remote, high-elevation area by appropriate motor vehicle. This uniqueness draws a substantial number of visitors, and by the nature of motorized travel, they are able to cover substantially more mileage than non-motorized users do. As such, the increased demand for semi-primitive motorized areas should be better reflected in the land allocation for the geographic area.