

SAR - Forest Plan - Chapter 3 - 242

Comment # Comment

- 0026810-010 Utility Systems within Brown Bear Core: Throughout the revision process, Audubon Alaska advocated for special management to minimize bear-human interactions as a conservation measure for Kenai brown bears (listed by the state as a population of special concern). The management prescription 'Brown Bear Core' was developed to address this issue and several key areas on the peninsula have been designated in the Preferred Alternative as Brown Bear Core. A significant problem with this prescription, however, is that it conditionally allows the construction of utility corridors which could seriously disrupt bear habitat by increasing human access to what are now roadless areas. This encroachment on bears would violate the intent of this conservation prescription, We strongly urge the Forest Service to modify the plan so utility corridors are not permitted in Brown Bear Core areas. As an alternative, we would recommend dropping the Brown Bear Core prescription altogether and designating these lands as Recommended Wilderness (131) or alternatively ANILCA 501(b) Recommended Wilderness (133) and renaming them as a National Fish and Wildlife Conservation Areas, hi addressing brown bear conservation on the Kenai, it is important to recognize that this small, isolated population is potentially at risk of extirpation. Proactive conservation measures now will significantly reduce the likelihood of substantial disruptions and economic impacts to local communities should an endangered species listing be required in the future.
- 0027242-007 BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.
- 0027586-002 .
CRITICAL KENAI PENINSULA BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads and winter motorized recreation activities. I ask that the forest service change these 'conditional' activities to 'no' or change the management prescription to wilderness as the best option for bear habitat protection.
- 0028389-005 Prescriptions

Brown Bear Core - . We endorse this prescription and believe it will provide appropriate protection for brown bears, providing one significant change is made. The Activities Table for Brown Bear Core allows Utility Systems as a 'conditional' activity. Unless Utility Systems is given a 'no', instead of 'conditional,' it will be just a matter of time before the misleading language in this prescription invites a major confrontation.

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0028504-006

4) Brown Bear Core:

Overall, TWS likes the concept of the Brown Bear Core prescription, and is encouraged by the fact that the Forest Service sees the need to create a prescription, which recognizes the sensitivity of the brown bear population within Chugach Forest boundaries, primarily on the Kenai Peninsula. By creating this prescription, the Forest Service responded to many people's scoping comments, which expressed that brown bears on the Kenai Peninsula need added protection in order to maintain the population's viability. From our perspective, however, the Brown Bear Core prescription falls short of its intent to protect brown bears in a number of ways.

For example, the Forest Service has heard from a number of scientists, including from the agency's own staff, that utility corridors are not compatible with brown bear habitat protection. At this time, the Brown Bear Core prescription conditionally allows utility corridors. This is not acceptable. Utility corridors would involve huge swaths of forest that would be cut and cleared. These large tracts of cleared land will have the same effect as a road would within critical brown bear habitat. Once these swaths of forest are cleared, these utility corridors will become travel corridors for the public, both for motorized and non-motorized activities, and the Forest Service will have little ability to limit access to these areas. The net result will be significant disturbance to critical brown bear habitat, and increased access by the public to areas that are intended to be protected in order to maintain the viability of the Kenai Peninsula brown bear population. Increased access will inevitably lead to an increase in defense of life and property kills, which already have increased significantly on the Kenai, and present serious management concerns to wildlife managers.

Further, the Brown Bear Core prescription is extremely liberal with respect to allowing motorized access in critical brown bear habitat. While the Forest Service has designed this prescription to allow motorized access for snowmachines and helicopters primarily in winter, the prescription also conditionally allows fixed wing aircraft landings in all seasons and commercial helicopter landings in summer. Studies both within and outside of Alaska have shown that brown bears are sensitive to and impacted by motorized activities, including snowmachines, fixed-wing aircraft and helicopters. TWS does not accept that the level of motorized activity allowed within the Brown Bear Core prescription incorporates responsible and protective management for the Kenai Peninsula brown bear population (please see attachment 5 for studies related to motorized uses and impacts to brown bears.).

Thus, TWS cannot accept the Brown Bear Core prescription as it is currently designed. TWS believes that the Brown Bear Core prescription, as written, is woefully inadequate in providing protection to brown bears because it allows utility corridors and an extremely high level of motorized activity. We request that the Forest Service review this prescription and change it so that utility corridors are no longer allowed and motorized activity is significantly limited to: snowmachine use only on trails that are designated open; no helicopter landings in any season; and fixed-wing aircraft landings limited to winter conditional-use only.

0028582-001

Vast areas are being set aside for bear areas. As far as I know, bears are not very good at reading maps and what is going to happen when these bears wander out of their areas. If you had checked with the State of Alaska, they have a map with all the known bear dens in the Kenai Peninsula for the last several years. By looking at this map, it is obvious the bears are not going to stay in your designated area.

0029049-004

Remove all Brown Bear core designations.

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0029063-023

Page 3-55, Line 1231 While the purpose of this theme is appropriate, it lacks the specificity needed to ensure appropriate protection for a species which requires large tracts of relatively ~ (

undisturbed and unfragmented habitats. Lack of quantified population objectives for brown bears on the Kenai Peninsula creates an uncertain situation for this vulnerable population. We suggest the population objectives be stated here. ~k~ ,~ ~ ~ ~ ~

Page 3-55, Line 1236 The Management Intent for this Ecological System's desired condition, for "Ecological processes relatively undisturbed by human activity," appears to allow activities that could disturb ecological processes, and thus, brown bears would not be adequately protected. The impression left by this paragraph is that it is the type of habitat that is critical to brown bears ("varied habitat types, age classes, structural stages, maintain habitat quality, associated species, managed vegetation"), however, based on findings from the IBBST, it is the food resource-salmon--that is critical to brown bears, not vegetation. Because it is critical that this food resource be available in undisturbed feeding areas, the building of campgrounds, roads, and trails to increase human fishing and use of anadromous streams and adjacent areas is not good for bears. In order to achieve the intent of this Management Prescription and to avoid increasing bear human conflicts, we believe human access should not be improved in the Brown Bear Core Management Area.

Page 3-55, Line 1253 We are concerned that conflicts are inherent in the current juxtaposition of activities allowed here and in adjacent areas. It appears that the Recreation Opportunity Spectrum (ROS) includes situations which are not compatible with the Brown Bear Core Management Area designation, e.g., Roaded Natural, which would allow resource modifications, developed sites, and motorized uses. The ROS of Semi-primitive Groups includes high concentrations of users and large groups of up to 100 people, with a low probability of experiencing solitude, closeness to nature, and tranquility. This high use would not be compatible with brown bears. The contradictions in this paragraph should be remedied to produce a desired condition more suitable for brown bears. For example, a number of activities, while not usually present, are not prohibited, under the Roaded Natural ROS (e.g., modified scenery, campgrounds, minor tourism developments, roads, motorized recreation opportunities, trails, hardened campsites and historic structures, maintaining or replacing existing cabins).

These activities would not minimize bear-human interactions, which is supposed to be a priority in this area. Clarification is needed on how new cabins could minimize bear human conflicts, and why this prescription appears to allow for increasing human use of Brown Bear Core Management Areas.

Page 3-56, Lines 1280-81 We are concerned with the statement that, while discouraged, utility corridors, power generation facilities, power transmission lines, marine transfer facilities, and administrative facilities may be allowed. All of these developments will need roads in one fashion or another. One IBBST issue of concern is that cumulative developments threaten the Kenai Peninsula's brown bear population. There is an abundance of literature concluding that roads have negative impacts on bears. We believe this prescription needs to be rewritten to better protect brown bears, e.g., where no alternatives are feasible, access road use will be restricted to) that essential for use of the facility only

Page 3-57, Brown Bear Core Area Management Area - Activities Table The table lists Marine Transfer Facilities with an ~ meaning the activity is not permitted. However reading the text of the Brown Bear Core Management Area on p. 3-56 it states " . . . marine transfer facilities an

administrative facilities are discouraged in this management area. They may be allowed if no ~/e feasible alternative is available." One says it is not permitted, the other says it may be allowed. We recommend such facilities not be allowed in Brown Bear Core Management Areas and the C ~ g

discrepancy between sections be rectified 6

Page 3-58, Line 1301 Under the Forest Plan, authorization of geophysical prospecting is to include terms and conditions controlling operating methods and times to prevent or control adverse impacts and prevent negative human-bear interactions. The Kenai NWR implemented similar restrictions when authorizing 3D-seismic survey activity by subcontractors to oil and gas companies on the refuge in 1998. Although stipulations were included on the permit to protect bears, a brown bear sow with cub were observed abandoning a den site where a survey worker "fell" into the mouth of the den. A week or two later another survey worker was killed by a brown bear boar that was disturbed from its den by a crew of several men laying wiring for explosives. It is impossible to

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know where all the dens and bear locations in an area are to properly apply stipulations to special use permits for geophysical prospecting. We believe the only guaranteed way to avoid bear human interactions is to not allow intensive use in Brown Bear Core areas.

Page 3-58* Line 1309 It is unclear how the USFS will reduce bear human interactions by creating recreation tourism developments. With regard to guided bear viewing, the IBBST has opposed commercial brown bear viewing on the Kenai Peninsula |

Page 3-59~ Line 1329 We believe that allowing roads for conducting minerals operations would negatively impact brown bears and is contrary to the primary purpose of Brown Bear Core Areas. ~

Page 3-60. Line 1357 This paragraph should clarify when Administrative facilities would be allowed or deemed necessary for effective management of brown bear habitat

0028328-018

· Brown Bear Core (242): the stated management intent of this prescription is to maintain selected habitat in a condition to provide sufficient habitat quality for brown bears on the forest. This Category 2 level-of-disturbance prescription should not allow utility corridors, which are a Category 5 disturbance. In addition, the presence of helicopters can be highly disturbing to bears, especially while denning. Summer and winter helicopter use landings should not be allowed. Other activities that should be re-evaluated for appropriateness include, managed vegetation, integrated pest management, commercial timber harvest (nonchargeable), personal use timber harvest, day-use facilities, roads, new trails, and fixed wing landings. The outfitter/guide capacity allocation of 90% is the highest capacity for any prescription. One of the prescription's goals is to minimize human bear conflicts. This percentage should be changed to reflect what is best to reduce stress to brown bears. Assuming other visitors will be visiting BBC areas, perhaps the Outfitter/Guide capacity should be dropped to 10-20% or a conditional 30% with Leave No Trace operators. Wildlife and Fish habitat projects should be changed to a conditional, based on whether the proposed project would be in conflict with the stated intent or would add unwanted competition for resources. There is nothing in Standards and Guidelines that measures certain activities to ensure brown bear objectives are met. Population objectives should be clarified. The activity matrix lists the Recreation Opportunity Spectrum (ROS) as Semi Primitive Non Motorized, yet the prescription narrative states the ROS will range from Primitive to Roaded Natural. This should be changed to Primitive. If these changes are not met, a better prescription for the protection of brown bear habitat effectiveness would be recommended wilderness.

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0029468-008 * Brown Bear Core

ARC supports the concept of the brown bear core prescription, and is encouraged that the Forest Service created a prescription that recognizes the sensitivity of the brown bear population within Chugach Forest boundaries, primarily on the Kenai Peninsula. By creating this prescription, the Forest Service responded to many peoples' scoping comments, about brown bears on the Kenai Peninsula that need added protection in order to maintain the population's viability.

The Brown Bear Core prescription falls short of its intent to protect brown bears in a number of ways. A serious deficiency with this prescription is that it allows the development of utility systems as a 'conditional' activity. The management intent for the prescription states, 'Utility corridors, power generation facilities, power transmission lines, marine transfer facilities and administrative facilities are discouraged in this management area.' However, 'discouraged' is a nebulous term. Furthermore, the following sentence stating that projects 'may be allowed if no feasible alternative is available' sends confusing signals. It can be expected that project developers will hire consultants and lawyers to demonstrate that no other alternative is feasible and that disturbance of a brown bear core area is essential for their project.

Any project that is likely to seek access across a proposed Brown Bear Core areas will be a major construction project that will necessitate not only road construction, but also vehicle access throughout the life of the project. Mentioning that, 'Resource projects in roadless areas must be accomplished without construction of new roads' will be seen as only a speed bump, not a stop sign, on the way to proving that there is 'no feasible alternative.'

Furthermore, the 'no feasible alternative' language in the prescription does not give any suggestion as to how feasibility should be determined. Consequently, it will be only a matter of time before the Forest Service is faced with a project proposal that will require technical and economic expertise well beyond that of managing a forest. The only way to avoid the time and money that will be needed to sort out the claims when this issue arises is to change Utility Systems in the Brown Bear Core Activities Table from 'C' to 'N.' Without this change, this prescription will not accomplish its intent.

0034495-008 BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.

0035082-005 Remove all Brown Bear core area corridors.

0035083-005 Remove all Brown Bear core areas.

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0035088-005 Remove all brown bear core areas.

0035090-005 Remove all Brown
Bear core areas.

0035093-005 Remove all Brown Bear
core areas.

0035095-005 Remove all Brown Bear
core areas.

0035097-005 Remove all Brown Bear
core areas

0035100-004 remove all Brown Bear core areas.

0035101-005 Remove all Brown Bear
core areas

0035103-005 remove all Brown Bear crow areas.

0035105-005 remove all Brown Bear crow areas.

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0035106-005 Remove all Brown Bear
Core areas.

0035109-005 Remove all brown bear
core areas.

0035118-005 Remove all Brown
Bear core areas.

0035120-005 Remove all Brown Bear Core designations.

0035121-005 Remove all Brown Bear Core designations.

0035122-005 Remove all Brown Bear Core designations.

0034592-002

BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.

0034623-004

BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.

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0034670-002

BROWN BEAR HABITAT. The proposed Brown Bear Core Area will not meet its management goal. A utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities are not compatible. Please change these 'conditional' activities to 'no'.

0034677-001

BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.

0034940-006

The Preferred Plan has Brown Bear Core area they have not had a unbiased scientific studies. Just more restriction.

0034942-002

As another example, I posed a question to Ted Schenck (Wildlife) concerning the proposed Brown Bear Core areas. I questioned how these areas were determined and established. I requested direction to scientific studies or data. Gary Lehnhausen responded (for Ted). He stated that the Brown Bear Core Prescription would be used to manage habitat where significant development and public use occurs. He mentioned 'protecting' the bears several times.

Gary sited Russian River campground as an example. According to Gary, the idea is not to remove the campground from the bears (?), but to limit the activities of the people to just that of the campground area! Gary stated that roads around the campground would be closed to access in order to prevent bear defense of life and property kills! He stated that other 'more restrictive' Prescriptions could also be used if necessary. For scientific studies, Gary sited data from radio telemetry showing that brown bears favor valley bottoms and salmon streams.

Now... what this means to others and me, is that the Forest Service knows that brown bears frequent these prescribed areas for salmon. Well, we all know that! This has been going on for hundreds of years. It also means the Forest Service doesn't know how many bears occupy these areas, or where they go in the winter. There is no proof of how the bears use the 'corridor'. The studies aren't very scientific, and definitely not scientific enough to close access roads, possibly remove campgrounds, restrict hiking, skiing, fishing, etc up the Russian River trails, and tell people where they must camp? If there were some great cause I could understand....but there isn't.

Furthermore. Gary uses the word 'protecting' very loosely. Brown Bears on the Kenai Peninsula are not 'protected' or endangered in any way. In fact, there is an open hunting season in these exact prescribed areas! Local game and wildlife management implied to me that they had been left out of the loop here. How disappointing. They stated that there may be other species of animals in these areas that are much more fragile than the brown bear. And we could count the number of life and property kills over the last 15 years on one hand. Really what Gary was telling me, is that my 8 year old daughter will not be able to experience the Russian Lakes area like I have.

0034950-003

Remove all Brown Bear Cove areas.

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0034951-005 Remove all Brown Bear corridors areas.

0034953-006 remove all Brown Bear Core areas.

0034954-005 Remove all Brown Bear core areas.

0034955-005 Remove all Brown Bear Core designations.

0034957-005 Remove all Brown Bear Core designations.

0034961-005 Remove all Brown Bear Core area corridors. They are biased and unscientific.

0034962-005 Remove all Brown Bear Core designations.

0034964-005 Remove all Brown Bear Core area

0034968-006 Remove all Brown Bear Core areas.

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0034969-005 Remove all Brown Bear Core area.

0034970-007 Remove all Brown Bear Core area.

0034971-006 Remove all Brown Bear Core areas.

0034972-006 Remove all Brown Bear Core area.

0034973-004 Remove all Brown Bear Core area.

0034981-005 Remove all Brown Bear Core designations.

0034982-005 Remove all Brown
Bear Core areas.

0034984-005 Remove all Brown
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0034985-005 Remove all Brown Bear Core
areas.

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0034988-005 Remove all Brown Bear Core areas.

0034989-004 remove all Brown Bear Core areas from the Kenai Peninsula

0034990-004 remove all Brown Bear Core areas.

0034992-004 Remove all Brown Bear core areas.

0034995-006 Remove all Brown Bear core areas.

0034996-005 Remove all Brown Bear core designations.

0034997-005 . Remove all Brown Bear core designations.

0034998-005 Remove all Brown Bear core designations.

0034999-006 Remove all Brown Bear core areas.

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0035000-005 Remove all Brown Bear core designations.

0035001-005 Remove all Brown Bear core designation.

0035002-005 Remove all Brown Bear core designation.

0035003-005 Remove all Brown Bear core designations.

0035004-004 Remove all Brown Bear core designations.

0035005-005 . Remove all Brown Bear Core designations

0035006-005 . Remove all Brown Bear core designations

0035007-005 Remove all Brown Bear core designations.

0035008-005 Remove all Brown Bear Core designations.

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0035009-005 Remove all Brown Bear Core designations.

0035010-005 Remove all Brown Bear Core designations.

0035011-005 remove all Brown Bear Core designations.

0035027-004 Remove all Brown Bear Core areas from the Kenai Peninsula

0035028-004 remove all Brown Bear Core areas from the Kenai Peninsula

0035029-005 Remove all Brown
Brown Bear Core areas.

0035034-004 Remove all Brown Bear Core areas from the Kenai Peninsula.

0035037-004 Remove all Brown Bear Core areas from the Kenai Peninsula.

0035039-005 Remove all Brown
Bear Core areas.

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0035041-005	Remove all Brown Bear Core areas.
0035042-004	remove all Brown Bear Core areas from the Kenai Peninsula.
0035066-006	Remove all Brown Bear Core designations.
0035070-005	Remove all Brown Bear core areas.
0035128-005	Remove all Brown Bear Core designations.
0035132-005	Remove all brown bear core areas.
0035135-004	Remove all Brown Bear Core area corridors. They are biased and unscientific.
0035137-005	. Remove all Brown Bear core designations.
0035138-005	Remove all Brown Bear Core designations.

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0035139-005	Remove all Brown Bear Core areas
0035140-005	remove all Brown Bear corridors for lack of scientific biological studies
0035141-004	Remove all Brown Bear Core designations.
0035142-005	Remove all Brown Bear Core designations.
0035144-005	Remove all Brown Bear Core area corridors they are biased and unscientific
0035145-005	Remove all Brown Bear Core designations.
0035160-005	Remove all Brown Bear Core designations.
0035170-005	Remove all Brown Bear core areas.
0035171-005	Remove all Brown Bear core area.

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0035177-002 Scientific study pertinent to the lands involved (I.E. Brown Bear core areas, reduced noise areas, etc.)

0035179-003 There is really on scientific study to back up Brown Bear Core area, so it should be removed totally.

0035183-002 For instance: Brown Bear Core areas, recreational scenic and wild rivers - reduced noise areas, etc.

0035238-005 Remove all Brown Bear Core areas.

0035242-005 Remove all Brown Bear Core areas.

0035248-006 Remove all Brown Bear corridor Core areas.

0035256-005 Remove Brown Bear Core areas.

0035257-006 Remove all Brown Bear Core area.

0035258-005 Remove all Brown Bear Core areas.

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0035260-005 Remove Brown Bear Core areas.

0035263-005 Remove all Brown Bear Core area.

0035264-005 Remove all Brown Bear Core designations.

0035266-006 Remove all Brown Bear Core areas.

0035269-005 remove all Brown
Bear Core areas.

0035270-006 Remove all Brown Bear Core areas.

0035271-005 Remove all Brown Bear
Core areas.

0035272-005 Remove all Brown Bear
Core areas.

0035273-005 Remove all Brown Bear
Core Areas.

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0035274-005	Remove all Brown Bear Core designations.
0035278-005	Remove all Brown Bear Core area.
0035282-005	Remove all Brown Bear Core Areas.
0035284-005	Remove all Brown Bear Core areas.
0035287-005	Remove all Brown Bear Core areas.
0035293-005	Remove all Brown Bear Core designations.
0035295-005	remove all Brown Bear Core areas.
0035298-006	remove all Brown Bear Core area corridors their unscientific & biased.
0035302-005	remove all Brown Bear Crow areas.

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- 0035306-005 Remove all Brown Bear Core designations.

- 0035308-005 remove all Brown Bear Core areas from the Kenai Peninsula

- 0035309-004 remove all Brown bear Core areas.

- 0035323-005 Remove all Brown Bear Core designations.

- 0035333-005 Remove all Brown Bear Core designations.

- 0035336-005 Remove all Brown Bear Core area corridors. They are biased and unscientific.

- 0035338-005 remove all Brown Bear Core areas from the Kenai Peninsula

- 0035341-005 Remove all Brown Bear Core designations.

- 0035344-005 . Remove all Brown Bear Core designations.

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0035365-004 remove all Brown Bear Core areas from the Kenai Peninsula

0035366-005 . Remove all Brown Bear Core designations.

0035369-005 Remove all Brown Bear Core designations.

0035370-004 remove all Brown Bear Core areas from the Kenai Peninsula

0035376-005 Remove all Brown Bear Core designations.

0035408-003

The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.

0035415-004

BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads & winter motorized recreation activities. Change these 'conditional' activities to 'no'.

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- 0035544-005 Critical Kenai Peninsula Brown Bear Habitat: The proposed Brown Bear Core Area is not going to meet the management goal of reducing bear/human conflicts with the allowances of utility corridors, conditional commercial timber harvesting, summer helicopter landings, new roads and winter motorized recreation activities. I ask that the Forest Service modify this management prescription by changing these activities from a 'conditional' yes to 'no' or change the management prescription to Wilderness as the best option for bear habitat protection. Brown bears on the peninsula are in a precarious position due to declining habitat. The protection of these core areas may be critical for their continued survival. The Resurrection Creek-Russian River area, in particular, should be changed to Wilderness.
- 0035547-009
- CRITICAL KENAI PENINSULA BROWN BEAR HABITAT. The proposed Brown Bear Core Area is not going to meet the management goal with a utility corridor, conditional commercial timber harvesting, summer SUP helicopter landings, new roads and winter motorized recreation activities. These activities do not ensure the protection of the most important bear habitat on the Kenai Peninsula and lead to more development spin-offs in a region where bear habitat is already shrinking dramatically. I ask that the forest service change these 'conditional' activities to 'no' or change the management prescription to wilderness as the best option for bear habitat protection. The Resurrection Creek-Russian River area, in particular, should be changed to Wilderness.
- 0035548-005 remove all Brown Bear Core areas from the Kenai Peninsula
- 0035549-005 remove all Brown Bear Core areas from the Kenai Peninsula
- 0035550-005 remove all Brown Bear Core areas from the Kenai Peninsula
- 0036314-006
- The plan does not identify how the Prescriptions will be enforced or at what financial expense they will be enforced. Examples: Noise, Brown Bear Core areas, W & S Rivers, etc.

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0036314-010

-- Prescribed Brown Bear Core areas conflict with State hunting and subsistence issues.

0036321-001

-- Crescent Lake Brown Bear Core Area. I have used this area for over 20 years; uses include fishing, hunting, aviation, hiking and snowmobiling. In all those years, I have never seen a brown bear in the area - nor have I seen any sign of brown bears. I have seen numerous black bears in this area, but no brown bears. I do not believe, therefore, that the Brown Bear Core Area designation is warranted/justified for this area.

0036322-002

As another example, I posed a question to Ted Schenck (Wildlife) concerning the proposed Brown Bear Core areas. I questioned how these areas were determined and established. I requested direction to scientific studies or data. Gary Lehnhausen responded (for Ted). He stated that the Brown Bear Core Prescription would be used to manage habitat where significant development and public use occurs. He mentioned 'protecting' the bears several times.