

Date submitted (Alaskan Standard Time): 10/31/2018 9:27:59 PM

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Comments:

There are many comments citing the enjoyable times spent on motorized vehicles in the Chugach National Forest. If the enjoyable times come at the expense of conservation, though, then these arguments are inadequate justification. The real question that should be asked is why do we propose change at all?

I am Alaska Native--my ancestors have lived here for thousands of years. How we access primitive land has changed, but conservation and respect for nature have always and will always be core to our beliefs. I believe this mindset is shared by the forest service as well as most Alaskans who enjoy the remote wilderness. I am primarily a non-motorized national forest user since I enjoy hiking, biking, cross-country skiing, downhill skiing, and backcountry camping; however, I have thoroughly enjoyed a couple old mining roads in the Chugach on ATVs. There aren't many roads/trails to ride ATVs in the management area and I don't have a snowmobile, so this change has little impact on me personally. However, I can see what this does to the Alaskan lifestyle and the value should be clearly identified.

Saving wild lands is a worthwhile effort, but does this plan accomplish meaningful change. The proposed draft land management plans appear to be change for the sake of change. There may be additional motives, but ultimately the reasons can be traced back to one of the four motives below.

- 1) The current plan is allowing permanent damage to significant and ever-growing areas of the National Forest.
- 2) To maintain or gain personal promotion, high-level forest service officials must show that they have strategic vision that will generate positive change for the environment.
- 3) The Forest Service has reached a point of stagnation and is searching for projects or additional opportunities for improvement.
- 4) Outside environmentalist are pressuring the Forest Service to keep Alaska wild.

I will address these motives in order.

Motive #1: The summer routes are largely on narrow single-track trails created decades ago by hunters or miners. These summer trails may travel five to 50 miles, but they are a small line in an incredibly immense wilderness. These trails are typically limited by terrain, so off trail impact is negligible. Summer access for motorized vehicles is so minuscule in comparison to the forest's vast acreage, that changing the management plan in response to summer motorized users is ludicrous. Since summer use does not appear to have enough impact to warrant this change, winter use can be examined next.

Winter rules require minimum snow cover before an area can be used by motorized vehicles. For the terrain in the Chugach National Forest, though, the limitation is naturally set as well. Without enough snow cover, motorized use is not enjoyable and leads to expensive machine damage. Once adequate snow cover is achieved, the land is buffered from damage created by motorized vehicles. Many of these areas can receive 20 to 30 feet of snow which make significant damage unreasonable to assume. This is demonstrated by the most popular snowmobile locations around the state. Most of the popular areas are in fragile tundra environments

above the tree line where there are no trees to limit movement. Yet when the snow melts, all the motorized vehicles tracks disappear and the land returns to pristine ground. Since the machines do not appear to significantly damage the forest land in summer or winter, the people themselves can be examined next.

There are bad actors in both motorized groups as well as non-motorized groups, so we can't eliminate the risk of national forest damage from people without banning people altogether. If we assume that a greater number park users create a greater risk to the environment, then we can assume that by closing much of the Chugach National Forest (this is essentially what is proposed when travel corridors from the road system are removed), we are transferring this risk to other areas of Alaska. People are still going to ride—they will just increase the populations elsewhere. Basically, this is transferring the perceived risk to the state parks. We are not reducing overall wilderness risk. If risk reduction were the goal, there are simpler solutions such as increasing the minimum snow cover.

Motive #2: On paper this effort looks good politically and in staff performance reviews. This change could be touted as a win for the environment. In reality, though, as illustrated above, we will be spending money to change the plan for little to no gained value. The strategic vision is flawed.

Motive #3: Idle minds will always find something to work on. If administrators are low on work, minds will seek to "improve". While this can be good, we must be careful that the changes actually add value. In this case, the value is not clear.

Motive #4: Allowing motorized use surely increases the number of people in an area, but not the way most outside environmentalists expect. Just because a beautiful forest is open, doesn't mean it will have vast numbers of people swarming the area like a National park in the lower 48. To enjoy motorized off-road vehicles, Alaskans must travel to relatively remote and primitive areas. Alaska is vast and the difficulty of reaching most locations means that the human impact is spread out. Once reaching a riding location, the riding isn't set up like a city park that anyone can explore. The terrain often limits novice riders. Even the most popular riding locations will max out with less than 150 vehicles on a weekend. Contrast this number with 20k people per day each in Yellowstone and Yosemite, 4k per day in Denali, and 6.5k in Arches national park. The machine footprint in the Chugach is negligible. It can be easy to see why outside environmentalist would apply their vision of national parks to Alaska.

From a lower 48 environmentalist perspective, there are so many wild Alaska pictures that show pristine land. It's obvious why they would seek to protect it—they would love to someday explore our home and enjoy the last frontier. The thought of a noisy 2-stroke snowmobile racing by and flying off jumps in such a beautiful place reduces the natural appeal; however, as I mentioned, the machine-accessible areas are so small in comparison to the vast forest that change is hardly warranted from an environmental standpoint.

In summary, with such long and cold Alaska winters, reducing winter enjoyment opportunities for locals without sound justification will only serve to hurt Alaska's economy. None of the four motives that I listed are satisfactory justification for this change. These proposals waste taxpayer dollars and harm the Alaskan way of life with no clear benefit to the land.

Although a no-change option makes the most sense, if a single plan must be chosen, alternative B would be the best.