

10/26/2018

I appreciate the opportunity to comment on the 2018 Chugach National Forest Draft Land Management Plan.

My name is Vaughn Schiweck. I have lived in Anchorage, Alaska since 2007. I thoroughly enjoy the ability to recreate in the Chugach National Forest. It is one of the more spectacular places on Earth. I believe that people should be able to access the forest as long as they do it in a responsible way that doesn't do harm to the forest. Due to the vast expanses and remoteness of the Chugach, motorized access is often required in order to fully experience the forest.

I am a hunter, fisherman, boater, dirtbike and mountain bike rider, backcountry snowboarder/splitboarder, and avid mountain snowmachiner. I was recently blessed with a baby boy who I hope will grow up to be able to experience the Chugach National Forest as I have. I hope to take him boating, fishing, hunting, and camping in Prince William Sound and on the Kenai Peninsula. I also hope to take him snowmachining in the spectacular mountains of the Kenai Peninsula and the Valdez/Cordova area.

My only major purchase the year I moved to Alaska was a snowmachine. My absolute favorite activity in the Chugach National Forest is riding snowmachines. Like many Alaskan snowmachiners, I have been a regular at Turnagain Pass. Sometimes my friends and I do snowmachine-assisted snowboarding laps and sometimes we just ride our sleds. I've ridden at Lost Lake, Johnson Pass, and Skookum many times. Just last year I made it to Whittier and experienced the awesomeness of the icefields above the Spencer and Blackstone glaciers. In 2017, I made it almost out to the big piece of National Forest land east of Valdez. I intend to check out Crescent Lake, Nellie Juan Lake, and Resurrection Pass in the near future. The riding is always good, and often it is amazing.

The Chugach provides truly world-class snowmachining that people in the lower 48 can only dream about. The steepness and ruggedness of the mountains, the vast beauty of the glaciers, and the depth of the snow are simply unparalleled. My friends and I have a lot of fun on our sleds, but we always stop to appreciate the beauty of the mountains that we have been able to access because of these motorized wonder machines. I hope that one day, my son and I will ride our sleds to the top of one of the many mountains in the forest, so that he too will get to look out and experience the jaw-dropping awesomeness that is the Chugach National Forest.

I recently became aware of the Forest Service's plan to update the Chugach National Forest Land Management Plan. As I started to research the options presented in the Draft Management Plan, in the Draft Environmental Impact Statement, and on the Chugach National Forest website, I started to realize that our motorized access to the Chugach National Forest is under attack. Of the four alternatives presented, A through D, none of them protect our motorized access as it currently stands today.

Alternative A:

Alternative A appears to be an obsolete also-ran that isn't really up for consideration based on the changes made during the 2007 Kenai Winter Access Project. I wonder why the Forest Service even included it as an option. I cannot support Alternative A.

Alternative B:

Alternative B comes closest to approximating the current situation. Unfortunately, Alternative B has some significant flaws:

The ROS (Recreation Opportunity Spectrum) map for Alternative B shows the huge piece of land east of Valdez and northeast of Cordova marked as "Primitive", meaning we would no longer be allowed to ride snowmachines there. There is no reasonable explanation for closing this area to motorized use. This closure is unacceptable to me.

The ROS for Alternative B doesn't show a motorized corridor from Whittier to the Spencer/Blackstone Icefields that would protect our traditional access to that amazing area.

The ROS for Alternative B doesn't show the existing motorized corridor up the Twentymile River.

For these reasons, I cannot support Alternative B as it is currently proposed. It needs some significant changes.

Alternative C:

In my conversations with Forest Service Personnel, Alternative C was pitched to me as the most attractive option for the recreational snowmachiner. When I pointed out that the Spencer/Blackstone Icefield area and Nellie Juan Lake area were marked as "Primitive" I was told that ANILCA would save our motorized access rights to those areas. I was told that ANILCA Section 1110 will protect my ability to do recreational snowmachining as a "traditional activity" in areas inside the Wilderness Study Area that have been used for snowmachining, no matter what color those areas are on the ROS. However, this warm and fuzzy feeling is based solely on the assumption that recreational snowmachining qualifies as a "traditional activity." ANILCA generally refers to subsistence uses - not recreational uses. Nowhere in the ANILCA document does it define recreational snowmachining as a "traditional activity." So, the interpretation is left to the Chugach National Forest. But alas, I was told that the lines in the Draft Management Plan that define recreational snowmachining as a "traditional activity" were accidentally deleted. But not to worry, those ever-so important missing lines will be in the final draft. I'm sorry, but that's just not good enough. No number of hand-over-heart earnest promises from Forest Service personnel will convince me that they will not take away our motorized access in the future if they have the opportunity. I need to see it in writing. I need to see these areas marked open for motorized use (brown or blue) on the Recreation Opportunity Spectrum maps. If the Forest Service intends to let us continue to ride snowmachines in these areas, then why not mark them open to winter motorized use (brown) on the ROS? I understand that the ROS is not the actual travel management rule, but it does guide future travel management decisions. Marking the Spencer/Blackstone Icefield and Nellie Juan

Lake areas “Primitive” (yellow) on the ROS will set the stage for the Forest Service to shut down our motorized access to these areas on a whim in the future. At the very least, it will cause unnecessary confusion for years to come. Relying solely on ANILCA to protect motorized access to these areas is a shaky proposition at best, and I predict it will not stand the test of time.

As if that wasn’t enough, Alternative C also comes with a myriad of additional restrictions on motorized use on the Kenai Peninsula, where much of the land goes from year-round motorized (blue) to winter-only motorized (brown). Although I understand that there is not much land currently open to motorized use in the summer, changing this land from blue to brown on the ROS dashes any hope that we will ever regain summer motorized access to any of it in the future.

Additionally, Alternative C comes with a vastly increased Area Analyzed for Wilderness Recommendation in the Wilderness Study Area, and with it, a vastly increased area marked “Primitive” (yellow). As someone who likes to boat, hunt, fish, and camp in Prince William Sound, I think that “Semi-Primitive Non-Motorized” (green) is an appropriate designation for this area. I think that increasing the size of the primitive area and the recommended wilderness area would be too restrictive on boaters, hunters, and fishermen in Prince William Sound.

The sales pitch for Alternative C was that we snowmachiners get access to the large piece of land east of Valdez/northeast of Cordova. But that deal is no bargain, because we already have winter motorized access to that land today! That area is not currently proclaimed closed to winter motorized use by a Forest Order, so it is therefore open to winter motorized use.

The other sales pitch for Alternative C was that it has the most acreage open to winter motorized use. This is laughable for two reasons: 1) The Comparison of Alternatives table in the Draft Environmental Impact Statement doesn’t list a status quo option. If it did, the motorized acreage in a status quo option would be similar to that listed for Alternative C. 2) The big “increase” in motorized acreage is due to the big piece of land out by Valdez/Cordova, which is remote and difficult for the average snowmachiner to access in a day trip.

For these many reasons, Alternative C is totally unacceptable to me. I view Alternative C as a sneaky ploy by the Forest Service. They are telling us what a great deal we are getting while actually setting the stage to reduce motorized access to our public land on a whim in the future.

Alternative D:

Alternative D has all the failings of Alternative C, but it’s even worse. It has the Blackstone Glacier area included in the Area Analyzed for Wilderness Recommendation. This is totally unreasonable because it almost guarantees that snowmachiners will be banned from this area in the future. I have no faith that our pleas to be allowed access to Blackstone under the traditional use provision in ANILCA will stand if this area is marked as Wilderness.

For this reason, along with all the reasons noted in my discussion of Alternative C, Alternative D is totally unacceptable to me.

My Recommended Recreational Opportunity Spectrum Maps:

Now that I've discussed my take on the disappointing alternatives proposed by the Forest Service, I would like to propose a solution that maintains motorized access while respecting people who enjoy non-motorized recreation in the forest. I would like to propose an option that takes the best parts of Alternative B and Alternative C. It takes some creative mixing of Alternative B and Alternative C just to maintain the access that we have today, without creating any new restrictions on our future access.

I propose what I will call a Modified Alternative B. This will be Alternative B as proposed by the Forest Service, with the following changes:

- 1) Keep the big piece of land east of Valdez/northeast of Cordova open to winter motorized use (brown) as shown in Alternative C. This is an amazing, scenic, and huge area for world class snowmachining and heli-skiing. It is remote, but it can be accessed via snowmachine on a good weather day in April with some determination.
- 2) Provide a motorized corridor (brown) from Whittier to the Spencer/Blackstone Glacier Icefield area as shown in Alternative C. This will protect traditional snowmachine access to this amazing area that is within reach of the majority of snowmachiners in Alaska.
- 3) Show the existing motorized corridor (brown) up the Twentymile river on the Recreation Opportunity Spectrum map.

I have attached maps that show this proposed option.

General Comments:

While doing the research on this subject, I found it inexplicably difficult to determine what the actual current access rules are. I never did find a current ROS map. I did find Current Summer and Winter Motorized Recreational Access Management maps, but then a Forest Service representative told me that these maps are not the governing documents. It turns out that for summer, the Motor Vehicle Use Maps are the governing document; if it's not proclaimed open on the MVUM, it's closed. For the winter, the Forest Orders are the governing document; if it's not proclaimed closed by a Forest Order, it's open (if there is enough snow.) But there is nothing in the Forest Orders document that directly states that the rest of the forest is open – you have to talk to the right person at the Forest Service to figure that out. The MVUM and Forest Order documents can be found on the CNF website, but they're buried. The Draft Land Management Plan refers to an Over-Snow Vehicle use map. But unfortunately, a Forest Service representative told me that map doesn't exist due to some kind of technical issue with the template. We need accurate, up-to-date Over-Snow Vehicle Use Maps that show the land that is open to motorized use. We'd all be a lot better off if the Forest Service took half the energy they spend finding creative ways to shut down our motorized access and put it toward making the public aware of the current rules.

I hope the Forest Service will consider comments provided by the public based on their merit. I hope they will give more weight to comments from people who actually spend time in the Chugach National Forest, and who actually studied the proposed alternatives vs the status quo. I hope the Forest Service will take the time to weed out the comments made by hackers and bots.

I hope the Forest Service will consider that recreation opportunities in the Chugach National Forest create a significant economic engine for Alaska. These opportunities are some of the biggest reasons why many people live in Alaska, including myself. People come from all over the world to heli-ski out of Valdez, rent a snowmachine and ride out to Spencer Glacier, or do snowmachine-assisted ski laps on the motorized side of Turnagain Pass. While they are here, they buy gear in our shops, food in our restaurants, and gas at the local stations. I personally have done more than my fair share of stimulating the local economy by buying snowmachines and gear.

I hope the Forest Service will recognize that closing down motorized access to places like the Spencer/Blackstone Icefield Area and Nellie Juan Lake area will not have the positive impact on motorized/nonmotorized relations that they are looking for. Areas like this are too remote for skiers to access. Pushing snowmachiners out of these areas would only cause more congestion, discontent, and safety issues in busier areas like Turnagain Pass.

The Chugach National Forest should be promoting and protecting motorized access corridors so the snowmachiners can go ride the backcountry while the skiers get the easier-to-access frontcountry to themselves like it is today. These corridors provide a needed compromise between the motorized and non-motorized users.

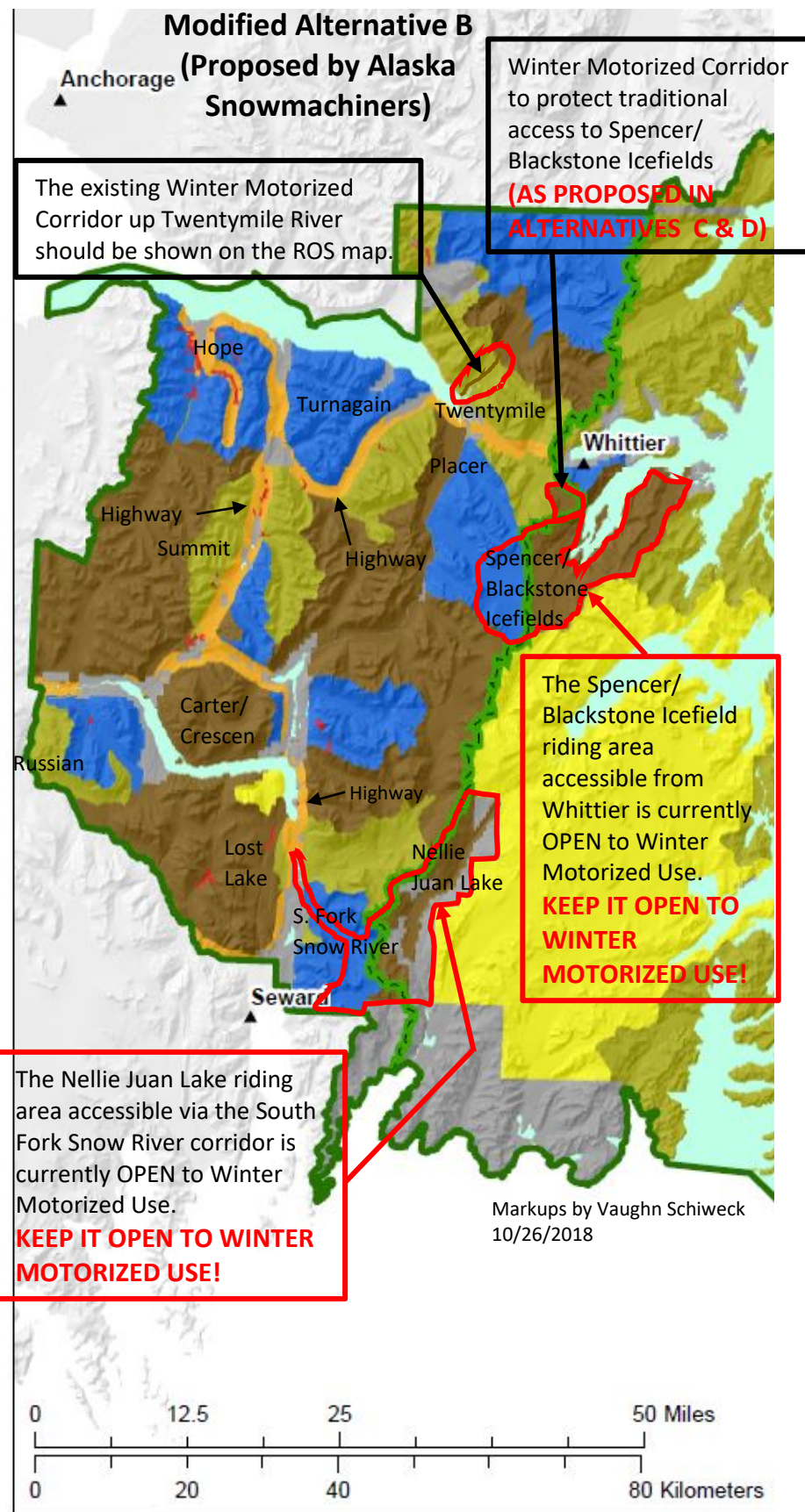
I am convinced that the motorized and non-motorized users can find a compromise that works for everyone. I think that relations between the motorized and non-motorized communities have been improving lately, partly because skiers have started to utilize snowmachines to access the backcountry. Alaska has some of the best sled-assisted skiing/snowboarding in the world, and it would be a shame to shut any of it down.

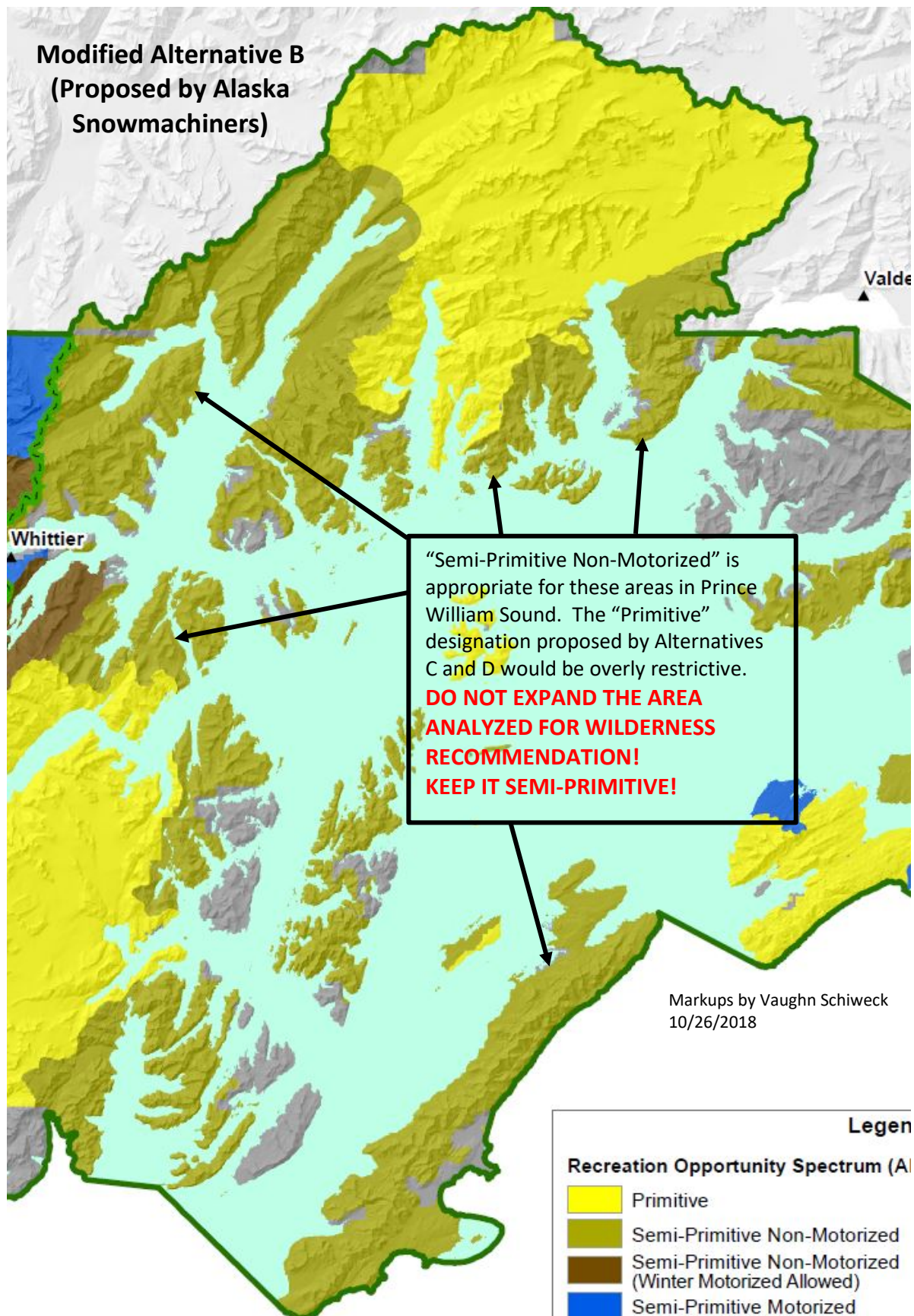
I am disappointed in the Forest Service's inability to put together a Forest Plan Alternative that is not a thinly-veiled attempt to restrict motorized access in the future. I should not be surprised, as the Forest Service has a proven track record of tightening restrictions, building gates, and demolishing roads. I hope the Forest Service will consider my proposal for a Modified Alternative B that maintains the status quo for motorized access and protects it for the future.

Due to issues with the Chugach National Forest Comment Page being hacked, I have attached this document as a PDF. I also intend to fax it in, as well as have it hand delivered to the office in Anchorage.

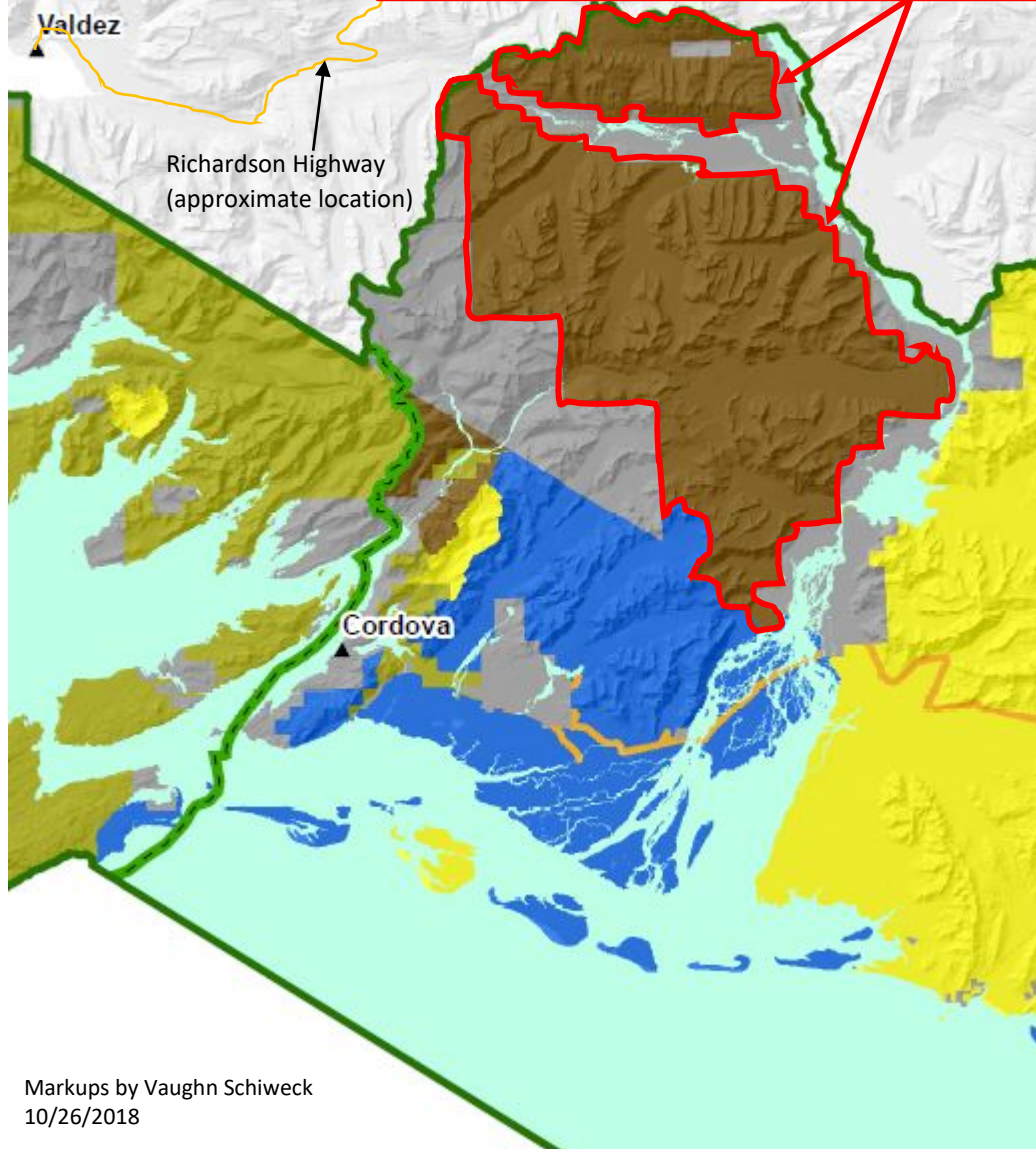
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My proposed Modified Alternative B Maps are attached on the next pages.











**Modified Alternative B
(Proposed by Alaska
Snowmachiners)**



Markups by Vaughn Schiweck
10/26/2018

Table 8. Applicable managerial recreation opportunity spectrum

| | Recreation Opportunity Spectrum Class | Surface Access¹ | Air and Water Access¹ |
|---|---|--|--|
|  | Primitive | Nonmotorized, primitive trails, foot, horseback | Kayaks, canoes, motorboats, airplanes |
|  | Semiprimitive nonmotorized | Nonmotorized, developed trails, foot, horseback, bicycles | Kayaks, canoes, motorboats, airplanes |
|  | Semiprimitive nonmotorized (winter motorized allowed) | Nonmotorized summer, developed trails foot, horseback, bicycles, snowmachines | Kayaks, canoes, motorboats, airplanes, helicopter landings (winter only) |
|  | Semiprimitive motorized | Motorized, snowmachines, off-highway vehicles, developed trails, foot, horseback, bicycles | Kayaks, canoes, motorboats, all aircraft |
|  | Roaded natural | Motorized, off-highway vehicles, snowmachines, developed trails and roads, foot, horseback, bicycles | Kayaks, canoes, motorboats, all aircraft |
|  | Rural | All types | All types |

Markups by Vaughn Schiweck 10/26/2018