

Data Submitted (UTC 11): 11/1/2018 1:56:16 AM

First name: Ken

Last name: Lares

Organization:

Title:

Comments: My name is Ken Lares,

Thank you for this opportunity to comment on the Chugach National Forest Plan Revision. All criticism is meant to be constructive.

I believe the CNFS should delay the closing of the comment period, the many questions about the accuracy and intent of maps representing the recreation opportunity spectrum should be addressed on the website and Facebook page prior to closing the comment period. The apparent glitch or hacking that reversed the intent of many comments supporting motorized use should be addressed and explained as well. Since when do "glitches" rewrite letters? My awareness of the CNFS has been low but I've recently spent a significant amount of time trying to "catch up" with what is happening and the intentions of the forest Service. I have many hours into your website, but I still don't feel I accurately understand the components I'm concerned about, partially because of how it is presented and partly because of the glitches or inaccuracies in the system. This in itself lowers the trust of your organization.

I've lived in Alaska most of my life. My brother and I first came to Alaska in 2000 when I was 12 years old to visit my dad in Valdez for the summer, it was a different kind of beautiful than I was used to. I am from beautiful north Idaho, but I'll never forget looking out the airplane windows at all those peaks and wondering if anyone had ever been there. The following spring break my brother and I came back up. It was a whole different world. My dad managed to borrow an Indy 500 for me and an old Arctic Cat 440 affectionately known as the "HOG" for my brother from some friends. We spent almost the whole two weeks riding in the Valdez area. That trip changed the direction of my life. I was hooked. I had never experienced the kind of freedom a snowmachine can give you. My brother and I spent all of our time digging each other out and riding with family friends.

The next fall my brother and I started school in Valdez. We ate, slept and breathed snowmachining as well as a number of other sports including dirt biking. During the darkest gloomiest times of year we had snowmachining to look forward to. We did night rides after school and learned how to repair and maintain our machines during the week so we could ride that weekend. I left Alaska in 2006 for the Marine Corps. I traveled a good bit and I've seen some beautiful places, none of them compare to here. I came back in 2010 and I've been involved with snowmachines since. Most of my riding has been in the Valdez area, I have made a few trips out though one being the use of the Primrose trail to get up in some good snow. It was a fun ride and since Valdez didn't have any good snow at the time a welcome change of pace. I am looking forward to making more trips to the CNF. The Chugach is different from the national forests in continental states in a few key ways that should alter the way the recreational opportunity spectrum is weighted. For starters there is hardly any private land here. I can't go buy 100 acres of riding area around Valdez or really anywhere there is decent riding. Everything is state, native or federal land. I rode my dirt bike all summer long on private land in Idaho as a kid. I rode all over old logging roads, my neighbors were all ok with it as long as I didn't rut it up when wet and I closed the gates behind me. That kind of access isn't an option here.

Population density, we aren't just sparsely populated we are separated by huge travel and time costs from the rest of the nation. Anyone in California can spend a few tanks of gas on a long weekend to go ride or visit any of the public land in the North West. That's a huge use potential. Alaska just isn't accessible this way. We will never have the number of people accessing our areas that they do, we will never be able to buy our own areas like they can, it will never be logged and have the trails they do. Ask any business if they can operate in Alaska the same way they do other places, I'll bet that's mostly a big no. The Forest service should approach managing public land in Alaska as uniquely as it is. The Forest Service should add recreational clubs to its list of key stakeholders alongside native corporations and land owners. In addition to the many marvels the Chugach and other parts of Alaska have to offer the lack of crowding and regulation is a big draw for the people who live here. We have traded easy access to big box stores and strip malls for access to the backcountry in all manners of recreation. We've traded cheaper utilities, vegetables (fresh ones), and fuel, free shipping for most online purchases and cheaper housing all for better access to the backcountry. Alaska is full of independents who love the outdoors

who have forsaken the conveniences of the lower 48 for the opportunities here, most are reluctant to join social organizations or be involved in politics. If you care about Alaskans and our use of the Chugach you must increase the efforts made to connect with them. That means building your online presence, hold live Q & A sessions online, and answer questions on social media, return phone calls (still waiting day 5 and counting). The first plan the forest service needs to update is its communication plan!

Compliance, whatever the forest service dictates will fail without buy-in, you could waste thousands trying to force unbalanced rules or you spend nothing and attain better results through collaboration with local groups that will promote your values. Your ability to obtain buy-in is critical to gaining compliance.

I would like to see more of a social presence of the Forest Service so those of us without an army of lawyers watching your every move can stay informed. The CNFS has 1500 or so likes and followers on FB which is slightly less than the Valdez Snowmachine Club. This is an area you can improve on. I would like to see more responses to questions and concerns addressed on the Facebook page. If there was more interaction online it would be much easier to dismiss unfounded concerns and move on to the real ones. This would build trust and gain buy-in. It's a shame an effort wasn't made earlier for that kind of visible, documented and trackable interaction. Half of the interaction online between snowmachiners is trying to understand the plans and what they mean. I realize most don't aspire to work for the Forest Service so they can maintain a Facebook page or do the things listed above. Well recreationalists don't typically factor these types of things in when they choose which sport, hobby or traditional activity to pursue but it comes with the territory.

Due to the confusion and some alleged inaccuracies in the mapping online I am hesitant to endorse one plan. I believe option B with the following amendments would be best.

*Please include the Copper River Delta area shown in Option C as open to winter motorized access in option B. This area is accessible from anywhere in the state on a weekend trip. I believe it is already seeing both motorized and helicopter use under the travel management plan. (Which is why Plan A doesn't appear to actually be "no change" as advertised)? Depending on the snow year this area is outstanding riding and provides an economic boost to the surrounding communities with the need for accommodations and gas purchases.

*Emphasize the development of corridors to allow access through non-motorized areas.

*I oppose designating any additional land as wilderness.

*I oppose changing the recreation opportunity spectrum to primitive on any additional land.

*Please include the areas open to winter motorized access in plans C&D such as Goat Mountain and the area open to summer time motorized access across the road from Summit Lake.

*Jack bay and upper Solomon Gulch should be open to winter motorized access, this has been ridden by locals for years. It is an excellent place to ride when the pass is socked in and is close to Valdez. After attending the public meeting in Valdez I asked around and many riders weren't aware there was any closed land in our area. This being off limits for motorized on paper simply doesn't make sense. It's a losing proposition, it doesn't represent actual use and it has never been effectively communicated. Get this off the books. Every rule you have such as this one that has no supported purpose (if it was supported we would have had complaints and discourse at the public level) detracts from every other rule you have and your organizations credibility. The funds that would be necessary to provide the required outreach, education and law enforcement necessary to try to enforce this would be an ineffective waste. Use those funds for something positive.

I feel the general land trading and acre counting approach in regards to recreational allocation is the wrong approach for sustainable recreation. Identify the area's that are acceptable for human use and give groups the opportunities to build, adopt, and maintain trails. Areas that need to be set as non-motorized can be done at the local level.

I am concerned that all proposed options and the general tone of the process in general is against motorized users and seeks to chip away at our recreation opportunities or lay the groundwork to do so. Just so we're clear I realize that these designations are what set the limits as to how generous the forest service can be, not how much they may restrict areas. Since that is what we are really talking about here, there is no reason any of the areas appropriate for motorized use in an ecological sense should be classified as non-motorized. Doing so just moves the decision power away from all of those who live and recreate here, isn't that what environmental justice is all about? Please stop catering to the groups from other places that have a small army of lawyers to push their agenda's. Please listen to those of us who live, work and raise families here. We don't need them to "save us

from ourselves" we need you to support our responsible use. These out of state groups aren't going to show up and volunteer hours to help you, but if you work with them I'll bet local motorsports clubs will.

We all care about this wonderful state. I don't believe any one group has any more right to these areas than another and none has the right to exclude anyone else. Any socially driven restrictions should be agreements between parties not judgements handed down from above.

I don't see any justifications for reduced winter motorized access in any of the environmental impact statement that is supported with scientific data. The only testing that I read about was carbon monoxide and particulate testing in parking lots and there was nothing found in excess of the EPA limits. I met with the forest service at the public meeting in Valdez and I was really impressed by the knowledgeable and grounded staff. However the tone in these plans don't represent the down to earth, look you in the eye, work to do right by all parties attitude portrayed by the individuals that I met. It reads more like it was written by a lawyer working for the trustees for Alaska or winter wildlands.

Does the CNFS recognize that user conflict is really social conflict? Is social policing a forest service function? If so the CNFS needs to increase its social presence. If you look at other states with wilderness plans and public recreation areas the segregated approach has simply created more tribalism. The CNFS should avoid this approach. The increased segregation just promotes conflict. Reading about the highly segregated areas down below is crazy, everyone is pointing sharp sticks at everyone else. The hikers hate the trail runners, they both hate the equestrians, all three hate the mountain bikers and all four of them are intolerant of motorized users. The segregated approach for recreation is really just discrimination. The CNFS should be working with all groups at the local level.

I've given several non-motorized folks a lift up the hill or down to wherever that lost board or ski ended up. None of them mentioned how much they disdained hearing my machine or how I ruined the scenery at the time. But put them in the position of fighting for their individual recreation areas (because you allow that context) and I'll bet every one of them will dredge up every negative thing they can think of about a snowmachine. Winter access should be recreationally appropriate or not, the same access for everybody in the management plan (all restrictions and corridors should be established at a series of meetings or individual comment sessions that can get down into the roots of issues).

From an ecological standpoint all of the studies referenced by the Trustees for Alaska, Winter Wildlands Alliance, Alaska Quiet Rights and other groups are skewed. Their comments warn of the technological advancements of snowmachines because of their range capabilities, but when it comes to emissions they reference studies from the 70's before machines became much quieter and cleaner in the mid 2000's. They don't mention the lighter weight and lower ground pressure of new machines. They don't mention the studies done that prove that someone on foot distresses animals more than OHV's do. They also don't mention that a hiker's ground pressure is 10 times higher than a snowmobile and that isn't accounting for the snow cushion between the snowmobile and the ground. What areas are closed to hikers?

It seems the forest service didn't consult or have anyone familiar with snowmachines write the sections about motorized recreation, specifically snowmachining. In contrast, the sections surrounding it are chock full of creative writing and reference the challenge level, diversity and solitude for their uses. It's like the non-motorized sections were written by a marketing agency trying to get more people into them and the motorized sections were written by someone who maybe saw a snowmachine once from a distance. Guess what, we care about those same things. We all like diversity in terrain, safe areas for beginners, challenges and the opportunity for solitude.

We live in Alaska right? So why is it when you get to the snowmachine components it's always a lame one liner like "Snowmachining is popular in these open areas". Not a word as to why or what attributes different snowmachiner's are looking for. Nothing about the need for both challenges and areas for beginners to learn.

The unique experience, backcountry access and mental health benefits they provide for older, younger, handicapped, or quite simply every demographic that non-motorized groups ignore. Nothing about needing areas close by to take kids or for those super deep days when getting too far out is asking for trouble.

Snowmachining is popular everywhere that can support it. Why doesn't the forest service take into consideration (or communicate that they do) the quality, accessibility and traditional use of terrain for recreational snowmachining? Discrimination against this group has started a domino effect leading nowhere but towards more discrimination. You push them onto smaller usable areas (so they are congested and meetups with other

users will generate conflict). Of course motorized areas aren't really motorized, it's just where they are also allowed to join everyone else. I'm not saying I want an area to ourselves, I want everyone to have equal access. In the long run it will be better for everyone if we start working together now, someday someone will want to take it all away and we should be on the same team. Outdoor Recreationalists.

Below are some of the sites I found while researching these issues.

Sincerely,

Ken Lares

<https://girdwood.com/sled-skiing/>

https://nature.berkeley.edu/classes/es196/projects/2008final/Alleyne_2008.pdf

<https://www.sierraclub.org/sierra/do-bikes-belong-wilderness-areas>

<http://www.sbnf-adopt-a-trail.com/>

<http://www.snowmobilers.org/mwg-internal/de5fs23hu73ds/progress?id=p0rPyTAmEbXSsrWNajsLwy1Rq2O-qg0iMBHlg1TP0qg>,