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Comments: I have lived in Soldotna, Alaska since 2014. I recreate in the Chugach NF year-round, specifically on the Kenai Peninsula. My family and I primarily hike, mountain bike, camp, backcountry ski, hunt, and snowmobile in the Chugach NF. We use Chugach FS cabins at least once a year, and during both the summer and winter seasons.

I consider myself an avid snowmobiler. I ride snowmobiles in CNF about 20 times per winter, on average. I always ride with at least one other person. The areas I primarily use for snowmobiling are Lost Lake (via Snug Harbor Rd or Primrose TH), Johnson Pass (via Moose Pass or east TH), Nellie Juan (AKA Snow River), Whittier, and occasionally Turnagain Pass and Hope/Palmer Creek Road.

I am particularly concerned about the adoption of any plan which restricts access to Snow River/Nellie Juan. I have made a cursory review of the DEIS and I take issue with certain findings, or lack thereof, pertaining to snowmobiles. It appears that the DEIS improperly lumps snowmobile use with other forms of motorized use (year-round or otherwise), and lacks scientific evidence needed to support its findings with respect to snowmobile use and environmental impact(s).

First, Page 23 of the DEIS notes that the winter motor vehicle corridor used to access the south fork of Snow River is "very popular with snow machine enthusiasts." I believe that this is an overstatement. In my experience, very few snowmobilers use this area, even when conditions are ideal. For instance, the parking lot used to access this area can only accommodate perhaps 12 vehicles with trailers. It is very rarely full. Moreover, the riding it is used to access is technical and thus not accessible to those without significant experience and skill.

However, I think the greater issues presented by the DEIS are presented by it lacking in almost any scientific data regarding snowmobile impact, and perhaps even more importantly - it appears that winter motorized use/access (snowmobile) is being conflated with all other motorized use.

For instance, P42 of the DEIS exemplifies this. It states, speculatively, that "Winter snowmachine use is the most common and widespread motorized use within the Chugach National Forest and may have the greatest effects on sensitive species due to habitat limitations, restricted mobility, and the vulnerability of animals in poor physical condition."

The issue presented is highlighted by the following paragraph, "Since information necessary to determine the intensity, patterns, and trends of motorized use are currently unavailable, analyses were limited to acres of land open or potentially open to motorized access as a surrogate to the area of habitat at risk from increased human disturbance." In other words, the DEIS drafters have little-to-no scientific evidence regarding snowmobiles, so have instead applied analysis of other motorized use impacts and imputed it to snowmobiles. This is not scientifically sound analysis, especially in conjunction with other findings in the DEIS. Snowmobiling is limited by seasonal snow pack and the impacts of snowmobiling, if any, would be by nature different than other motorized uses. The DEIS seems to admit that snowmobiling has no or negligible impact on air quality (P218). Likewise, assessments in the DEIS regarding snowmobiling environmental impact, or "incidental effects" are speculative and theoretical (P242). I take specific issue with the conclusions used to justify plan alternatives found on P242, including that snowmobiles may harm the forest floor and organic matter in low snow areas. This issue is already addressed. The Forest Service is required to only open these areas to snowmobile use when conditions permit, and should be closing these areas when these issues occur.

I also read the DEIS to understate the economic impact of snowmobiling. P91-92 recognizes that snowmobilers

have higher spending patterns, yet states that adjustments to motorized vehicle use or changes in recreation opportunity spectrum classes would be negligible. These conclusions seem to be at odds with each other, but it also again conflates snowmobiling with all motorized use.

In conclusion, it is imperative that snowmobile access not be restricted based on assumptions made without proper scientific bases. It is inappropriate to restrict snowmobile access based on the impact(s) of other motorized use(s).