Data Submitted (UTC 11): 10/29/2018 1:14:50 AM First name: Noah Last name: Mery Organization:

Title:

Comments: I moved to Soldotna in 2014. My family and I use the CNF at least 30 times per year, on average. In the winter, we snowmachine and backcountry ski. In the summer and fall, we hike, mountain bike, camp, and hunt in CNF. We rent CNF cabins at least once per year. I use the CNF 15-20 times per year for snowmobiling. The primary areas I ride are Lost Lake (via Snug Harbor Rd and Primrose TH), Johnson Pass (via Moose Pass and East TH), Nellie Juan, Whittier, Carter Lake, and occasionally Turnagain Pass and Hope (Palmer Creek Rd.).

I am writing this letter in response to the DEIS. I submitted a previous comment, but I understand that there was a problem and it may have been lost. Indeed, when I have attempted to view my comment online, the file is a comment from a different author relating to different forests in 2016.

There are various alternative plans that, if adopted, would result in reducing acreage available for snowmobile use. This is particularly apparent in alternatives C and D. I oppose these alternatives. Especially those that restrict access to Nellie Juan/Snow River. I believe that the DEIS dramatically overstates the usage that this area and Carter Lake receive from snowmobiling. Both areas have relatively tiny parking lots that are rarely full. Likewise, while I use these areas 2-3x per year each, when conditions are ideal, I have observed very few other people there.

The DEIS is fundamentally flawed otherwise. It does not distinguish snowmobile use from other motorized use, when snowmobile use is distinct from other motorized uses, which are often year-round and different by nature. Likewise, proposed restrictions on snowmobile use are not evidence-based and instead reliant on unsupported speculation.

For example, the DEIS states "The Forest Service does not have the information necessary to determine the current level or patterns of motorized use, how these patterns may be changing, or how this use may be affecting sensitive wildlife species inhabiting the Chugach National Forest. In the absence of this information, the current analysis will focus on the acreage of lands classified open or potentially open for motorized uses as a surrogate to the area of habitat at risk from increased human disturbance." Page 393.

Likewise, "Winter snowmachine use is the most common and widespread motorized use of NFS lands, and due to habitat limitations, restricted mobility, and the vulnerability of animals in poor physical condition, it may have the greatest effects on sensitive species. 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." Pages 418-19.

This rationale is problematic. It seems that the DEIS is considering general motorized use analogous to snowmobile use, as a basis for restriction of snowmobile use. Snowmobiling is distinct. This fact is not appreciated by the DEIS. Instead, the scientific evidence in the DEIS suggests that snowmobiles have minimal impact. First, the DEIS seems to recognize that snowmobiles have negligible impact on air quality. See Page 311. The DEIS also claims that snowmobiles may harm terra firma in low snow conditions. This is obviously true, but the CNF has the ability to close areas when conditions are inadequate for snowmobiling. See Page 144.

The status quo should be maintained. If restrictions on snowmobiles are being adopted, they should be science based and not speculative. Alternative plans that further restrict snowmobile use are not based on sound science.