

Appendix A

Seward-Girdwood Iditarod National Historic Trail

Response to Public Comments on EA

Public Involvement

The National Trails Act designated the Iditarod National Historic Trail (INHT) in 1978. Since then, the INHT Seward to Nome Route Comprehensive Plan published in 1986 further developed the purpose and need for this action and provided guidelines for the protection, development and management of the Primary Route and Connecting Trails and for associated heritage resources along the entire length of the INHT. A proposal to re-establish the Seward to Girdwood INHT has been listed in the Chugach National Forest Schedule of Proposed Actions (SOPA) quarterly publications since April 2001. The SOPA is sent out to approximately 300 people. The proposal was provided to the public and other agencies for comment during scoping from November 26, 2002 to December 27, 2002.

The availability of the EA for public review and the legal notice of 30-day public comment period were advertised in the Anchorage Daily News in July 2003. The EA was mailed to approximately 50 interested parties and organizations and an email with a link to the EA was sent to another 97 people. The EA was also available at the Seward District Office, the Glacier District Office in Girdwood and the Supervisor's Office in Anchorage. Comments were received from 39 individuals, organizations, and agencies. Responses to comments are shown below. Each comment and response is coded so they can be referred to in other comments.

A2: Definition of Traditional Activities

Comment: Many commenters were concerned with our definition of traditional activities. They believe recreational snowmachining should not be considered a traditional activity. Some commenters believe we should adopt the definition used by the Park Service for Old Denali Park (former Mount McKinley National Park).

Response: This comment was brought up during Forest Plan Revision. The response to comments on the Forest Plan EIS applies in this case as well (Revised Land and Resource Management Plan, Appendix K, Page K-24). Traditional activities are defined in ANILCA, the Alaska Regional Supplement to FSM 2326.1, and in the Glossary for the Revised Land and Resource Management Plan Final EIS (page Glossary-51). The definition is as follows:

“Traditional activities include, but are not limited to, recreation activities such as fishing, hunting, boating, sightseeing, and hiking. Such uses are subject to reasonable regulation to protect natural and other values of wilderness from damage. Traditional activities, which are legal, shall be allowed to continue in wildernesses where such use has occurred, and no proof of pre-existing use will

be required in order to use a snowmachine, motorboat, or airplane. No permits will be required by the general public to use these specific types of motorized transport or nonmotorized surface transportation methods for traditional activities that are otherwise allowed in areas not specifically closed to their use. ANILCA provides that such access shall not be prohibited unless, after notice and holding a hearing in the area, there is a finding that such use would be detrimental to the resource values of the wilderness. Closure of broad areas or entire wildernesses is not contemplated. However, restrictions or closures of specific areas within a wilderness may be made by the Regional Forester if, after public notice and a hearing, it is found that such use would be detrimental to resource values (Section 1110(a) of ANILCA).”

This definition is appropriate for projects that implement the Chugach Forest Plan. Redefining traditional activities is outside the scope of this project.

A3: ANILCA Hearings

Comment: Some commenters thought that since the Forest Service cannot predict the outcome of the ANILCA hearings the figures (miles) are meaningless and therefore the analysis is incomplete.

Other commenters suggested that we should not go through hearings; rather, the Forest Plan should be amended in the most expedient way to allow for winter motorized use on CSUs on the Chugach National Forest.

Response: The ANILCA 1110 hearings are required to prohibit winter motorized use on portions of the proposed INHT routes. While it is true that we cannot predict the outcome of the hearings, the analysis in the EA is complete because we have analyzed a range of alternatives to cover management options regardless of the outcome of the hearings. Alternatives analyzed in detail include an all motorized alternative as well as alternatives with a mix of motorized and nonmotorized trail segments (see EA pages 6-14).

The other part of the comment suggests that we amend the Forest Plan to allow motorized use on all CSUs and avoid the hearings. Since two of the alternatives require hearings, it would be prudent to conduct the hearings and use the information when making the decision. In addition to testimony received during the hearing process, other factors considered when making the decision include meeting the purpose and need of the project, addressing the key issues, and accomplishing the outcomes committed to in the Forest Plan.

A8-A9: Lack of Adequate ANILCA policy

Comment: Some comments state that the Forest Service does not appear to have a good policy on how ANILCA should be interpreted and should reexamine and analyze Section 1110(a).

Other comments suggest that we adopt DOI regulations to implement ANILCA 1110(a).

Response: Redefining Agency policy regarding ANILCA 1110(a) is outside the scope of this project. Using the traditional activities definition in the revised Chugach Forest Plan EIS glossary is appropriate for projects that implement the Forest Plan, as was explained in comment A2 above.

A10: Protect Inholder Access

Comment: Concern was raised that we need to protect inholder access under ANILCA Section 1110(b).

Response: All activities would be consistent with Federal Law, including ANILCA Section 1110(b).

A11: Monitor Resource Conditions

Comment: The Forest Service must still monitor resource conditions and can still close areas to motorized use where damage is occurring.

Response: Monitoring is an important part of Forest Service activities. The Chugach National Forest routinely monitors snow conditions and closes areas and trails to winter motorized use when snowpack conditions are exceptionally low or insufficient to protect the natural resources.

A4, A5, E2, and E3: State of Alaska and Alaska Railroad Concerns

Comment: The State of Alaska and the Alaska Railroad have identified a number of legal concerns related to the applicability of ANILCA and Section 4(f) of the Transportation Act easements granted by the State and the Railroad for the Iditarod National Historic Trail.

Response: The concerns identified by the State and the Railroad are outside the scope of the NEPA process, which analyzes the environmental effects of the proposed project. The legal issues raised cannot be resolved through the NEPA process but will be addressed during implementation of the project.

P1: Amendments to the Forest Plan

Comment: Commenters noted inconsistency in analyzing an alternative in detail that would require an amendment to open the trail to motorized use but not an alternative that would require an amendment to close the trail to motorized use. Also, concern was raised that the development of the Forest Plan took many years to overcome controversy and the Forest Service should not consider amending it now.

Response: The interdisciplinary team did look at options to provide an alternative that was completely nonmotorized. However, there were no feasible opportunities for a completely nonmotorized route within direction set in the Forest Plan. Any reasonable route would go through areas that are currently open

to snowmachines. A completely nonmotorized alternative would also need to meet the requirements of ANILCA where we would need to show detriment to resource values to prohibit snowmachine use. Since the analysis for the revised Forest Plan recently showed that snowmachines were an appropriate use in some of these areas, we could not reasonably find that a detriment to resource values would occur in these areas with this project. In addition, traditional uses of these areas have included motorized uses and much of the trail is along highways and railways. For those reasons, a completely nonmotorized alternative was not considered a reasonable alternative and was not considered in detail.

On the other hand, the interdisciplinary team developed an alternative that was completely motorized that would require a forest plan amendment to meet requirements of Federal Law (ANILCA). No such law exists for nonmotorized use, so the Team stayed with the basic premise of meeting Forest Plan direction.

P2: Forest Plan Under Appeal

Comment: Concerns were raised that the Forest Plan was under appeal and we shouldn't proceed with this project until the appeal was resolved.

Response: Direction regarding implementation of Forest Plans is found at 36 CFR 217.10 – Implementation and stays of decisions, as follows:

- (a) Implementation of any decision subject to appeal pursuant to this part shall not occur for 7 calendar days following publication of the legal notice of the decision as required in this part.
- (b) Requests to stay the approval of land and resource management plans prepared pursuant to 36 CFR part 219 shall not be granted. However, requests to stay implementation of a project or activity included in such a plan will be considered as provided for in paragraph (c).

P3: Range of Alternatives

Comment: Concerns were raised that we did not analyze a full range of alternatives, specifically a nonmotorized alternative.

Response: The Forest Service did consider an all nonmotorized alternative, but did not analyze this alternative in detail (see EA page 14). See response to Comment P-1 for an explanation why this alternative was not considered in detail.

I1: Future Wilderness Designation

Comment: The commenter fears that the establishment of the INHT will further impede or eliminate future designation of wilderness in the Kenai Peninsula region.

Response: The proposed activities are within inventoried roadless areas, which will be considered for wilderness recommendation in the next revision of the

forest plan. None of the proposed activities will alter the roadless character of the areas to the degree they would no longer qualify; they will remain as roadless areas. The areas were considered for possible wilderness designation in the revised Forest Plan; however, in the final decision they were not recommended for designation as wilderness. They may again be considered in the next revision process for possible designation as wilderness. The additional activity within a roadless area will be a factor to consider in a decision to recommend or not recommend an area for designation as wilderness, however it will not prevent the area from being considered for designation as wilderness.

R1: Summer Motorized Recreation

Comment: Concerns were raised that summer motorized opportunities are lacking. Specifically, some commenters were concerned that Alternative 3 showed the trail from Nash Road to Bear Lake as nonmotorized in the summer.

Response: The INHT proposal, in all alternatives, used current Forest Plan direction regarding summer motorized recreation use for all segments on the National Forest. On non-National Forest Land, adjacent NF management direction was applied, especially when terrain limited practicality of using motorized vehicles (wet or steep ground). The Alternative 3 map incorrectly showed the trail from Nash Road to Bear Lake as “nonmotorized summer / motorized winter”; it should have been “motorized year-round” as in all other alternatives.

R2: Winter Motorized Recreation

Comment: These comments were about keeping the whole trail open to winter motorized use. Specific comments include: exclusion of snowmachines is unfair; no reason to close developed trail to snowmachines; consider the ADA (Americans with Disabilities Act); boon to tourism; age of population; and new 4-stroke technology (non-smoking and quiet).

Response: Alternative 3 analyzed the effects of having all feasible routes open to snowmachine use. Local ordinances in Seward and Girdwood do not allow this use within these communities. We considered trying to restrict use to 4-stroke engines, to reduce concerns about noise; however, enforcement of this would be so difficult it was dropped from further consideration.

R3: Winter Nonmotorized Recreation in Girdwood Valley

Comment: No motorized use should be allowed in the Girdwood Valley.

Response: Alternative 3 would allow winter motorized use only on trails with National Forest jurisdiction in Girdwood Valley. This includes trails where the Forest Service has an easement across State or Municipal lands. All other

alternatives would continue Forest Plan direction by not allowing motorized use on any of the trails within the Girdwood Valley.

R3a: Increased Winter Motorized Use

Comment: Concerns were raised that all the action alternatives would increase winter motorized activity and reduce opportunities for winter nonmotorized activities. They also comment that we did not adequately analyze the impacts of the increased use.

Response: In the Environmental Consequences, Key Issue 2: Motorized/Nonmotorized Recreation section of the EA (pages 22-25), we acknowledge that trail use of all types is anticipated to increase, with a corresponding potential increase in user conflicts, but that extensive open space, off trail, is available for people seeking to avoid these conflicts.

In all but Alternative 3, Forest Plan direction regarding motorized/nonmotorized use was used. The Plan analyzed the effect of these management decisions, and did not conclude that there would be reduced opportunities for nonmotorized users. In Alternative 3, there would be approx. 47 miles of trail that would be open to winter motorized uses that are not open in any other alternative, reducing the recreation opportunity for winter nonmotorized activities by this amount, in this alternative.

Although we did not measure the actual amount of increased motorized use attributed to this project, our assessment of potential increases shows there would be no substantial effects. There would be approximately 105 miles of trail with winter motorized use. Of the 105 miles, approximately 61 miles are existing trails where winter motorized use is already allowed. Increased motorized use on these trails would likely occur regardless of this proposal. The remaining 44 miles are new trail segments. Approximately 14 of the 44 new trail miles are located in the highest concentrated snowmachine use area on the CNF at Turnagain Pass and currently receive very little to no nonmotorized use. At Turnagain Pass, nonmotorized users use the area on the east side of the Seward highway, which is closed to motorized use. Another 6 miles of trail along Kenai Lake is not managed for winter use and very little to no increase in winter motorized use is expected. Low use is expected on approximately 2 miles of trail from Ptarmigan to Vagt Lake mainly due to a lack of attractions and proximity to routes currently used by snowmachiners between Kenai and Trail Lakes. Winter motorized use is not expected to increase substantially on approximately 7 miles of trail between Vagt Lake and Johnson because most motorized use would occur on adjacent lakes as opposed to the trail. Finally, there are approximately 15 miles of winter trail over frozen lakes (Bear Lake, Kenai Lake, and Trail Lakes) where winter motorized use already occurs when conditions permit.

R4: Shared Trails

Comment: Concerns were raised that all trails that are shared between motorized and nonmotorized users would be dominated by motorized users and would eliminate opportunities for nonmotorized use. Effects of these shared trails on nonmotorized use are not adequately analyzed in the EA.

Response: For shared winter trails, the Recreation Effects Specialists Report includes the following, “many of the high use areas have alternative, preferable places, such as frozen lakes or creeks that most snowmachiner’s use when conditions permit”. Existing trails that are proposed to be part of the INHT system include Johnson Pass in all alternatives and Lost Lake/Primrose in alternative 4. Both these trails are shared winter use trails now and this would not change by implementing the INHT proposal. Several other existing trails would continued to be managed exclusively for nonmotorized winter use in Alternatives 1, 2 and 4 (Grayling Lake, Goldenfin Lake, Trail of Blue Ice, Portage Pass, Winner Creek), resulting in no change to the current conditions in all alternatives except Alternative 3. Additionally, all Girdwood trails that are not on National Forest lands or easements would be nonmotorized in all alternatives.

There is only one segment of trail with shared motorized/nonmotorized use in the summer, from Nash Road to Bear Lake. The Recreation Effects Specialists Report states “Primary users of this segment would be local, although with increased recognition as part of the INHT, more non-local use is anticipated, along with a potential for increased user conflicts.”

The EA stated that shared use trails would be at least 3 feet wide, to allow people to pass. What was not in the EA, but is part of the trail design standards developed for this project, is the clearing width. All trails managed for winter use will have a 10’ wide cleared width, to allow an open canopy for snow accumulation and provide space for passing. Naturally occurring openings will provide additional user flexibility and separation.

R5: Boat Use on Portage Lake

Comment: Commenters wanted to make sure that boat use on Portage Lake would not be visible or in any way affect the view from the Visitor Center. There were suggestions about allowing the Ptarmigan to drop people off to access the trail.

Response: The boat use on Portage Lake would be along the lake’s north shoreline between Portage Pass Trail’s end at the lakeshore and a point below the small parking area near Placer Creek in Bear Valley. A trail would be built from the parking area down to this lake access point to allow carry-in boat access. Portions of this lakeshore are visible from BBVC, the closest point is approx. 4,000 feet away, and the furthest is over 2.5 miles. The boat-access trail would be constructed to allow only small boats to be carried in; their small size would make them virtually invisible to the human eye at these distances.

The EA did not analyze allowing the Ptarmigan to drop off people. It would be more visible than the small boats described above, but it is already operating in

the general vicinity of the Portage Pass trail so allowing this use would not change what is currently visible from BBVC.

R6: Dog Mushing

Comment: Recommend that portions of the trail be managed primarily for dog mushing.

Response: Dog mushing is not a predominant recreational use of trails in this area, so was not chosen as one of the managed uses. Compared to snowmachine trail design standards, mushers may prefer larger turn radius when they are running long strings, but are capable of negotiating tighter turns, although not as efficiently (may require stopping/slowing down). Mushing would not be prohibited on any trail segment.

R7: Snowmachine Regulations

Comment: Recommend regulations for snowmachine use: travel on single track, and speed limits.

Response: These types of regulations were discussed during Interdisciplinary Team meetings, but not incorporated into the EA because enforcement would be nearly impossible.

R8: Balance Between Motorized/Nonmotorized Recreation

Comment: Concerns are that motorized and nonmotorized winter opportunities are not balanced. They also add that nonmotorized segments are affected by motorized activity because they are within sight and sound of motorized areas.

Response: This comment is correct; there are more miles where winter motorized users could be present than miles where they are prohibited in all action alternatives. The types of allowed uses follow forest plan direction in alternatives 2 and 4, in alternative 3, forest plan amendments would be required to allow winter motorized use in areas the forest plan closed to winter motorized use. Allowing winter motorized uses is considered in detail because the INHT is a CSU, which falls under the provisions of ANILCA, which allows snowmachines to be used for traditional activities.

The second concern, most winter nonmotorized segments are within sight and sound of motorized areas is also true, but most of these trails are also within sight and sound of existing high snowmachine use areas such as Turnagain Pass and the Lost Lake/Primrose Trails. In addition, many trails are within sight and sound of the Seward Highway, which is a busy highway in Alaska. In Alternatives 2 and 4, the trail through Winner Creek is nonmotorized and is removed from the sight and sound of motorized activities.

T1-R3: Historic Trail/Nonmotorized

Comment: Allowing motorized use on the INHT goes against the history of the trail. Most of the trail was actually a general route and so an actual trail should only be built where it can be documented.

Response: The intent of the INHT project is to provide a recreational trail that allows people to experience the Iditarod. The Federal Trail administrator (Bureau of Land Management) for the INHT has advised us that the exact location and modes of travel do not need to conform to what was in use during the gold rush era when the trail was originally established. Most of the use in the Iditarod was in the winter due to extensive wetlands and river crossings that were impassable when thawed. Any summer use would also, then, be against the history of the trail.

T2-T4: Twentymile

Comment: There were several comments against the Twentymile portion for the following reasons: it lacks historical reference; it's too expensive; it crosses wetlands; bears use the area; and this segment would not be usable for most of the year.

Response: While it is correct that the maps included in the 1986 Comprehensive Plan did not show the same route through the Twentymile Valley as is being proposed; a map prepared by the BLM includes this route as part of the INHT. Historical use of any route through Twentymile valley was low; however, this does not preclude establishing a recreational trail through this valley as discussed in the response to T1, above.

The trail proposed for Twentymile valley is a Trail Class 2, a primitive trail with only 1 bridge across Rosehip Creek. All other streams would be forded. The flagged route avoids crossing wetlands by staying at the toe of the slope, out of the river's floodplain. Bears use this area, as they do other areas along the proposed trail. Portions of this segment would be under snow for longer than most other segments of the proposed trail, however since it will be managed at a Trail Class 2, users would be expecting to find more rustic trail conditions, including walking over snow. This segment would not be managed for any winter use due to its location through many large avalanche deposition areas, and because the valley offers better recreational opportunities that are regularly used away from the hazardous side slopes, as discussed in the Recreation Specialist's report.

T5: Turnagain Pass

Comment: This comment voiced opposition to having a motorized trail on the west side of T-Pass. Another comment was opposed to having a year-round trail on the west side of T-Pass.

Response: The west side of Turnagain Pass is currently open to winter motorized use and has the highest concentration of snowmachine use on the Chugach National Forest. Constructing a winter-only trail here would require building bridges and clearing some trees in the lower elevations. Part of the need for this trail is to encourage snowmachiners to park at the new Granite Creek Recreation area parking lot, because the existing parking lots at the Pass are often overcrowded. Building a snowmachine trail from this parking area to the pass will enable snowmachiners to more easily use the Pass if they are parked at Granite Creek.

The EA recognized the visual impact of having a year-round trail on the west side of the Pass (page 28).

T6: Lost Lake Trail

Comment: Commenter felt that the addition of the Lost Lake trail was outside the scope of the project.

Response: Adding the Lost Lake/Primrose trail responds to the key issues identified during public scoping. The addition of this trail allows for a continuous route from Seward to Girdwood that is open to snowmachines and also protects the values of quiet, solitude, air quality, uninterrupted nonmotorized recreation, safety, and views of pristine landscapes on the parallel alternate nonmotorized route. Also, see response to T1. Additionally, conversations with the BLM indicated that many segments of the INHT in other parts of the state are in some cases hundreds of miles from the original Iditarod route. Many of these changes were done to allow the trail to connect to existing communities since many of the mining communities are no longer inhabited.

T6a: Other Site-Specific Recommendations

Comment: This comment recommends a bike path along the Seward Highway through the wetlands in the upper Turnagain Arm area.

Response: The recreation specialist's report suggests this would be the only feasible route from Ingram Creek to Twentymile valley, and that the State had proposed to build a bike path between Girdwood and Ingram Creek as part of reconstructing this section of the Seward Highway, although the planning for this project is not scheduled to begin before 2005. This highway bike path (from Girdwood to Ingram Creek) could be designated part of the INHT. While the recommendation offers a reasonable alternative to the current highway shoulder with narrow bridges, which are scheduled for widening, it is outside the scope of this project.

T7: Motorized Use Along the Highway

Comment: Commenter questioned whether motorized use was allowed along the Seward Highway.

Response: Motorized use is allowed along the highway, as described in a memo from Boyd Brownfield, PE, Deputy Commissioner dated May 8, 2000. “Snowmachine and off-highway vehicle use within the department’s rights of way is to be managed in accordance with 13AAC 02.455.” This regulation allows snowmachine or OHV use on highway rights of way when the highway is not a controlled access highway, outside the roadway or shoulder and no closer than 3 feet from the nearest edge of the roadway. (a4) Also allowed are: Crossing highways (f), and traversing a bridge or culvert (a1).

T8: Trailheads

Comment: Girdwood Board of Supervisors requested a yearlong trailhead on Crow Creek Road at milepost 2.9. This trailhead would include toilet facilities. Another commenter noted equal trailhead facilities should be built for all users.

Response: The GBOS comments are acknowledged and will be incorporated into the decision. The trailhead facilities will be constructed to accommodate the type of users for the adjoining trail sections. Separate facilities for all user types would not be an efficient use of funds.

E1: Enforcement

Comment: There were comments that we did not adequately address enforcement.

Response: Enforcement of areas closed for snowmachine use is accomplished through the Law Enforcement division of the Forest Service. First the closed area is identified generally in the Forest Plan or other appropriate document. Closure orders are then written, published and posted in an appropriate location, such as a trailhead, parking area or campground. They are also posted on the Forest Website at: <http://www.fs.fed.us/r10/chugach/>

Routine patrols are conducted by Forest Service Law Enforcement Officers and specific follow up responses are conducted following citizen reports of violations. Authority for enforcement of closures is found at 36 CFR 261.3 through 261.58.

W1: Impacts to Wildlife and Fish

Comment: The comment states that the Forest Service failed to address the direct, indirect, and cumulative impacts to fish and wildlife populations caused by winter motorized use. Specifically, they are concerned about effects of the proposed expansion of winter motorized use on wildlife. They disagree with finding in the EA (page 34) that indirect effects from recreation are not expected to be substantial. Concern was also expressed the while recreation on the trail

may not have substantial effects; the trail gives motorized users the ability to leave the trail, which would greatly increase effects on wildlife habitat.

Response: The direct, indirect, and cumulative impacts to fish and wildlife populations caused by winter-motorized use were analyzed in detail in the Wildlife Specialist Report, which supports the EA. The Forest Service has already analyzed the impacts of motorized activity on wildlife species on a broad scale in the Final Environmental Impact Statement (FEIS) for the Forest Plan (Chapter 3). This analysis showed that allowing motorized use in the specified management areas, although potentially impacting individual animals, is not expected to impact population viability of any species. The Iditarod Trail alternatives are all under the umbrella of the current Forest Plan, except Alternative 3, which would require a Forest Plan amendment.

The wildlife specialist report states that indirect effects may include reduction in habitat quality within a 15-20' trail corridor due to removal of vegetation, which may provide food, cover, breeding substrate, roosts, perches, etc. Recreational activities along the trail have the potential to disturb wildlife, causing temporary disturbance or displacement, or more permanent displacement from the area. Disturbance may cause stress, disrupt breeding, foraging, or traveling. The extent of disturbance will depend on the activity, noise level, behavior of individuals, and tolerance of individual wildlife species. The extent of acres within a 400' trail corridor that was analyzed, however, makes up less than 1% of available habitat on the Forest. Because such a small amount of habitat is affected, the effects are not expected to be substantial, or to affect population viability of any species, for any alternative.

W2: Brown Bears

Comment: Commenters feel the Forest Service has done an insufficient and incomplete analysis of existing studies and potential direct, indirect and cumulative impacts from motorized use on brown bears. Commenters do not agree that the increase in Defense of Life and Property (DLP) kills is not likely to have a substantial effect on this species. In addition, they believe that the Forest Service did not consider Alaska Department of Fish and Game hunting closures because DLP kills and vehicle collisions exceeded the limit on brown bears. Finally, commenters are concerned that greater trail access will allow more hunters and other users to leave the trail and enter the "huge undeveloped areas" where brown bears reside.

Response: The human population has expanded from just over 9,000 in 1960 to approximately 50,000 in 2000 while bears killed in Defense of Life and Property (DLP) totaled approximately 20 in each decade of the 1970's and the 1980's, and then totaled 50 in the 1990's. Whereas the human population steadily grew each year, the DLP kills spiked in the 1990's (see Suring and Del Frate 2002 paper published in the journal *Ursus*). They have continued to spike upward in the 2000's. For example, in 2002, Interagency Brown Bear Study Team (IBBST; a consortium of scientists from the US Forest Service, US Fish and Wildlife

Service, National Park Service, and Alaska Department of Fish and Game, along with several other collaborators) records indicate 8 females and 16 total bears died on the Kenai Peninsula. As of September 15, 2003, there are 6 adult females and 17 human caused brown bears mortalities.

Of the 16 bears killed in 2002, 7 were killed in vehicle collisions and the remaining 9 in DLP. Of the 9 bears killed in DLP, 2 were killed during hunting trips (1 by a moose hunter, 1 at a black bear bait station), 4 over livestock and poultry, and 3 were related to fishing. Of the 17 brown bears killed in 2003, 5 were killed outside homes, 5 were related to hiking incidents, 4 were related to fishing incidents (Russian River), 2 were related to moose hunting, and 1 was killed while it was eating a moose calf. No brown bears on the Kenai Peninsula are known to have died in vehicle collisions during 2003.

The EA does not reflect the number of Kenai Peninsula brown bear hunting seasons opened or closed by ADFG. This information is processed by Jeff Selinger, Kenai Peninsula Area Biologist for ADFG. Hunting closures are based upon the number of female bears and the total number of bears killed by human-caused mortality. In 2002 and 2003, the hunting seasons were closed because the number of human caused mortalities exceeded the limit instituted by the Alaska Board of Game. As explained above, the types of human-caused mortalities range widely and negative human-bear encounters are of great concern to the Chugach National Forest. Recommendations are in place for trail design to enhance visibility, signs to alert people, and outreach material to educate people.

The question as to whether a specific type of activity causes more bear kills is hard to answer. Mortality from year to year has been anomalous, and discerning patterns from 2002 to 2003 has been difficult. For example, the suspicion that increased annual highway collisions (as seen in 2002) would persist in 2003 did not occur. Much of the proposed reconstruction of the Iditarod National Historic Trail follows highway, road, and trail corridors that are already in place. In our analysis, we assessed the proposed trail based on modeled algorithms developed in the resource selection functions study. These functions were based on (IBBST research) movements of 43 adult female radio-collared bears from 1995-2001, from which over 30,000 point locations were obtained. Modeling the landscape and human variables led to the development of probability of use maps (indexed low, medium, and high), which we generated in relation to this project. This model has been through rigorous statistical testing; final iterations of the model are in progress now for publication, and the model is being tested against a previously published cumulative effects model. The analyses lead to the conclusions that the proposed trail passes through few places considered high or medium probability of use, and that these locations are adjacent to road corridors and existing trails. The reason these small landscape areas were positive for probability of use by brown bears was that they lay adjacent to anadromous streams. We made the recommendation to buffer anadromous fish streams according to Chugach National Forest Standards and Guidelines.

During the revision of the Forest Plan, an extensive analysis was completed on the potential direct, indirect, and cumulative impacts of motorized activities on brown

bears. The Forest Plan has also incorporated the impacts of recreation on brown bear populations and habitat within components of the inventory and monitoring assessment. This monitoring guide is currently being developed and is due to be published in June 2004. Whereas we did not specifically address in the EA how brown bears will be monitored with respect to potential impacts from motorized activities, the IBBST maintains an extensive monitoring program, including productivity, recruitment, and movements of bears across the Kenai Peninsula. The research effort is not linked to specific projects, such as the *Seward to Girdwood INHT*, but rather to the population-level influences of human activity on them. It may be most appropriate to address questions at this Kenai Peninsula wide (population level) scale, and where conservation efforts may be most productive. Further, no indications of snowmachine impacts on the distribution and movement patterns of large ungulates along the corridor of the proposed *Seward to Girdwood INHT* are known, or that ungulate population declines have occurred there. These populations are managed in hunting units by ADFG and careful attention is paid to population levels. Similarly, careful attention is paid to ensure that anadromous streams are protected, and that nutrient needs by bears are not displaced.

The concept that the entire mountain range will be opened to hunters and other users after the proposed trail is built is unlikely since the areas are so large and would involve extensive off-trail hiking through rugged terrain. In addition, much of the trail is near the Seward highway and does not extend very far into new terrain. Nonetheless, as in other trails, people may use the proposed Iditarod Trail and the surrounding landscape according to their interests. Guidelines and restrictions regarding other recreational activities will be in place.

W3: Lynx

Comment: The Forest Service must consider the potential effects of snowmachining on lynx populations. The Forest Service should consider diminished habitat quality, increased threats by competitors, elevated levels of human access, displacement, injuries and death as a result from increased access by humans, in addition to impacts associated with winter snowmachine use along the INHT.

Response: (Note: references cited in project record). The potential effects of snow-machining, diminished habitat quality, increased threats by competitors, elevated levels of human access, displacement, injuries and death resulting from increased access by humans, were considered in detail in the wildlife effects analysis. The Forest Service analyzed the impacts of motorized activity on lynx on a broad scale in the FEIS for the Forest Plan. This analysis showed that allowing motorized use in the specified management areas, although potentially impacting individual lynx, is not expected to impact population viability. The Forest Plan states that risks to population viability of lynx are associated with loss of early seral habitat, and mortality from hunting and trapping. The wildlife specialist report states that trails creating new access for hunters may affect lynx

by increasing human access. Snowmachines also offer greater access for trapping. Nonmotorized recreation can affect lynx because disturbance is dispersed and unpredictable, and snowmachining can be particularly adverse because it occurs when animals are in poor condition due to winter stress (USDA 2002a). Trail edges may provide habitat for foraging snowshoe hares, and hunting areas for lynx; beneficial to lynx in one respect, but detrimental if it makes them more vulnerable to hunting or trapping. Repeated exposure to disturbance that is predictable in time and space may cause lynx to adapt (Olliff et al 1999). Less than 1% of habitat on the Chugach National Forest occurs within the 400' wide trail corridor, for which effects were analyzed. Within this corridor, only a small portion of these acres contains early successional habitat preferred by lynx. Increased access to hunters or trappers is unlikely to have any substantial effects on the population. The trail may impact individual lynx, but is not expected to cause a downward trend in populations or impact population viability.

W4: Moose

Comment: The commenter states that the Forest Service has failed to adequately analyze the direct, indirect and cumulative impacts of snowmachines on moose populations. They claim that moose numbers are declining on the Kenai Peninsula, yet the Forest Service continues to advance winter motorized recreation opportunities without having done studies of winter motorized impacts to moose. The commenter believes moose winter range is the primary limiting factor for moose and that winter motorized use could be a factor among others in the population's decline.

Response: (Note: references cited in project record). The Forest Plan states that moose populations on the Chugach National Forest appear to be stable, but that habitat may decline over time as a result of natural plant succession. Winter range, or the available hardwood forage below 1000' elevation, is the primary factor limiting the moose population on the Kenai Peninsula. The Forest Service analyzed the impacts of motorized activity on moose on a broad scale in the FEIS for the Forest Plan. This analysis showed that allowing motorized use in the specified management areas, although potentially impacting individual moose, is not expected to impact population viability. The wildlife specialist report states that impacts to winter range and disturbance that displace moose from preferred winter foraging areas may affect moose. Recreation along the trail, such as hiking, biking, snow-machining etc, has the potential to disturb moose. Moose are thought to be comparatively tolerant of humans and to have the ability to develop a high level of habituation (Shank 1979). This is illustrated in several ways, including flight distance. Snowmachines may disrupt bedding within 300 m and foraging behavior within 150 m. This disruption causes energetic costs of movement and nutritional costs of lost foraging time or displacement to less suitable foraging areas. Moose gradually moved away from trails as snow machines arrived. Most often, these are temporary, short-term disruptions. Rudd and Irwin (1985) investigated impacts to wintering moose resulting from

recreational activities in western Wyoming. People on snowshoes or skis caused more disturbances than snowmachines. The average distance 242 moose ran to escape a snowmachine was 10.5 yards, and the average distance at which moose were displaced by skiers was 59.25 yards. There is approximately 20 miles of trail managed for snowmachines in moose winter range, approximately 20 miles managed for skiing, and approximately 10 miles managed for both in all alternatives. Only some of these miles likely get high snow machine use.

The literature indicates flight and stress are most likely when the source of the disturbance is unpredictable, is severe to sensory perception, and is in close proximity. There is also the possibility that if disturbances are not of this nature, moose may habituate to human activities and show high tolerance. Moose may even seek centers of human activity as security from predators.

Moose in the Greater Yellowstone Area were particularly affected by human use of the backcountry-motorized areas. Because of the way humans recreate in these areas, it is unlikely their activities will be predictable to moose. Routes, time of day, and numbers of people will be highly variable. As a result, there is a high probability of initiating a flight response and a low probability of habituation occurring. Backcountry areas managed for snowmachine use in moose winter range along the Iditarod Trail corridor were identified. Mitigation was developed to reduce impacts to individuals. This includes interpretive/educational signs at trailheads leading into important moose habitat to educate users about moose habitat and potential interactions. The extent of acres within a 400' trail corridor that was analyzed, however, makes up less than 1% of available habitat on the Forest. Within this 1%, only a portion is moose winter range. Within this portion, only a small portion is expected to have high snowmachine use. These areas have mitigation to reduce effects. All alternatives may affect individual moose, but there is no data to suggest that any alternative will have a substantial effect on Moose or impact populations or viability.

W5: Wolves

Comment: Wolves are impacted by snowmachines and snowmachine trails. Snowmachine trails, whether created by snowmachines or grooming equipment, may adversely alter predator-prey dynamics, habitat use, predator and ungulate movement, and distribution patterns. The Forest Service has failed to adequately address the impacts of motorized activity on wolf populations.

Response: (Note: references cited in project record). Studies show that wolves tend to avoid areas of snowmachine activity, yet activities that compact snow, such as snow-mobiling and skiing can help provide travel routes in areas that may otherwise be inaccessible due to deep snow.

Studies in Yellowstone, Voyageurs and Isle Royale National Parks (Creel et al 2002, Olliff et al 1999) tested for relationships between snow machines and glucocorticoid (stress hormones) levels in wolves and elk. Levels were substantially higher in areas and times of heavy snow machine use, and correlated

both in the short term and the long term with snow machine activity. Effects of chronically elevated levels of GC can cause reduced reproductive success, ulcers, immune system suppression, and muscle wasting. The study showed no direct evidence that current levels of snow machine activity were affecting population dynamics. While individuals or even packs may be affected by motorized winter recreation, it is unlikely to affect viability of wolves on the forest (USDA 2002a) due to the abundance, quality, and distribution of habitat.

W5a: Wolverines

Comment: Wolverines may also be adversely impacted by human disturbance, including associated snowmachine use that will result from the proposed INHT. The Forest Service has failed to adequately address the impacts of motorized activity on wolverine populations.

Response: The primary food for wolverines during winter is carrion of big game such as sheep, goats, and moose. Sheep and goats are not expected to be impacted by this project. There is no data to suggest that moose populations will be affected either. Wolverines have tremendous physical endurance and can travel up to 40 miles a day in search of food. There is no data to suggest that the Iditarod Trail will impact the abundance or distribution of winter carrion.

Denning habitat on the Kenai Peninsula is unknown at this time. Potential denning habitat adjacent to the proposed routes was considered in the wildlife specialist report. Areas that had the characteristics of potential denning habitat in other areas of Alaska, or outside Alaska, and denning habitat located in past surveys by Alaska Department of Fish and Game were noted. Areas adjacent to the proposed Iditarod routes are near existing trails or highways, which are unlikely to serve as denning habitat now, or to be impacted to any substantially greater extent if incorporated into the Iditarod Trail.

W6: Fish

Comment: The commenter believes that aquatic species will be greatly impacted by sedimentation caused by the construction and maintenance of this trail and by exposure to harmful contaminants, which may occur from contaminated snow run-off during spring thaws, among other ways. The Forest Service must comply with NEPA and provide an informed analysis of the direct, indirect, and cumulative impacts to aquatic species.

Response: In response to the comment regarding sedimentation, there was no basis presented for the assertion that “...*aquatic species will be greatly impacted by sedimentation caused by the construction and maintenance of this trail...*” within the commentor’s letter. Excerpts from the Iditarod Fisheries report of December 13, 2002 provide a response to this comment:

“Stream sedimentation is another concern to the fisheries resources. The trail(s) have potential to introduce sediment into the adjacent lakes and streams.”

Sediment introduction into lakes and streams is not necessarily harmful as streams are natural transporters of sediments and lakes are natural collectors of sediment. The majority of streams the trail crosses are higher velocity channels that normally have a constantly moving bedload. These streams need varying amounts of rocks, gravels, sands and silts annually introduced into the channel to maintain healthy fish habitat. Some streams such as Snow River and Twenty Mile River transport huge volumes of glacial silt. Though these waters provide limited direct habitat they provide migration corridors for coldwater species to access more suitable habitat. Limited amounts of sediment this trail project may introduce into these silty streams is not a concern to fisheries.

Stream problems can occur when too much fine material in the form of sand and silt is introduced into streambeds that cover gravels important to coldwater fish. Trails generally do not produce significant amounts of sediments to affect fisheries habitat in any measurable way.

There is occasionally a concern over landslides created by trails and the sediment these landslides pose to fish habitat. Trail construction planners must follow Forest Plan standards and guidelines, and the USDA Forest Service Soil and Water Conservation Handbook of Best Management Practices. This guidance provides direction for minimizing adverse impacts to water and attendant fisheries resources. The majority of the fish habitat standards and guidelines are defined by soil and water concerns, and are designed to protect and maintain such elements as stream channels, stream banks, riparian vegetation, and water quality. Additionally, project protection and mitigation measures may be found in the Region 10 Aquatic Ecosystem Management Handbook. The basis for protection is the identification of riparian areas. The riparian areas directly affect the form and function of the aquatic ecosystem, stream processes, and the quality and quantity of fish habitat. Riparian areas include the land adjacent to the water body, and the upslope areas that have a direct effect on aquatic habitat.

The INHT reconstruction/construction presents a low risk to adversely effect fisheries resources. Implementing various conservation measures will minimize adverse effects on fish habitat, thus protecting and conserving habitat to support sustainable fisheries and their contributions to healthy ecosystems.”

Implementation of applicable Best Management Practices (BMP) should ensure protection of fisheries and aquatic resources. See EA page 15 for a list of the BMPs.

In response to “...aquatic species will be greatly impacted ...by exposure to harmful contaminants.” the commenter cites four references. The **Oris (1998)** reference is a study conducted at Lake Tahoe California/Nevada to assist in determining the potential toxic and phototoxic impact of ambient levels of motorized watercraft hydrocarbon emissions. The study was conducted in July and August 1997 and analyzed the effects on zooplankton, Ceriodaphnia dubia and flathead minnow Pimephales promelas larvae. Conclusions were focused on exhaust components from motorized watercraft at the study site. The relationship to hydrocarbon contamination in a large Sierra Nevada Lake as compared to water

based contamination resulting from hydrocarbon discharges from snowmachines is not substantiated within the study.

The **Heintz et al. (1998)** reference was a study using pink salmon embryos where the researchers exposed the embryos to direct contact with oil-coated gravel, direct contact with the effluent from oil coated gravel and direct contact with very weathered oil coated gravel. This study was aimed at determining possible effects of crude oil associated with the Exxon Valdez oil spill on pink salmon embryos. The relationship to hydrocarbon contamination from direct contact with crude oil as compared to water based contamination resulting from hydrocarbon discharges from snowmachines is not substantiated within the study.

Balk et al. (1994) studied the effects of two-stroke outboard motor engine exhaust on rainbow trout, perch, and flathead minnows. Experiments were conducted by injecting fish with exhaust condensate, feeding fish with cod chips containing engine exhaust condensate, or running an outboard engine in a tank then transferring that water to a holding tank where fish were present. The relationship to hydrocarbon contamination from injection, ingestion or holding tank exposure as compared to water based contamination resulting from hydrocarbon discharges from snowmachines is not substantiated within the study.

The last reference was associated with testimony of **John P. Giesy (1997)** to the Tahoe Regional Planning Agency on pollution and boating in Lake Tahoe. Additional excerpts from Dr. Giesy to the Tahoe Regional Planning Agency in 1997 state:

"John P. Giesy, PhD, of Michigan State University, made a written statement to the Tahoe Regional Planning Agency, in which he refers to the Swiss and Swedish studies, as well as studies done at Switzerland's Lake Constance, in an attempt to answer the question put to him: "Is it possible that petroleum hydrocarbons released to Lake Tahoe from outboard, two-stroke engines in recreational watercraft could cause toxicity to aquatic organisms and pose a hazard to the aquatic populations of Lake Tahoe?" His answer - yes, it is possible. But, and this is what's usually left out, he qualified his answer by writing, "Because I have not had an opportunity to review all of the available literature and because I have not had an opportunity to view Lake Tahoe and collect my own information, at this time I can only indicate the potential for adverse effects to occur from continued inputs of PH from the use of two-stroke outboard engine in recreational watercraft." He then says, "I agree with the authors of the report entitled: 'Lake Tahoe Motorized Watercraft Impact Analysis' (Feb. 1997), when they state on page 3-9 of that report that, 'The cumulative impact of hydrocarbon emissions on water quality and the aquatic environment cannot be accurately quantified at this time.' I think the possibility of hazard does exist and that further analyses would be necessary to determine that the operation of two-stroke outboard engines is completely safe for the aquatic environment."

Here again, the relationship to hydrocarbon contamination in a large Sierra Nevada Lake as compared to water based contamination resulting from

hydrocarbon discharges from snowmachines is not substantiated by the statements.

The cited references relate to hydrocarbon pollution studies in free water. Though, it is understood that under certain circumstances, this is a serious problem that effects fish life cycles, the references clearly do not link two-cycle snowmachine use and resulting hydrocarbon emissions which occurs in Southcentral Alaska with detrimental effects to local fisheries. Consideration must be given to area and use intensity, weather, temperature, runoff, and a myriad of other factors to determine effects, if any, from snowmachine emissions. Currently, we have little information to suggest that snowmachine emissions in Southcentral Alaska are causing measurable negative effects to our fish stocks.

References Cited:

Balk, L., G. Ericson, E. Lindesjoo, I. Petterson, U. Tjarnlund, and G. Akerman. 1994. *Effects of Exhaust From Two-Stroke Outboard Engines on Fish*. Institute of Applied Environmental Research, Laboratory for Aquatic Ecotoxicology, Stockholm University.

Giesy, J.P. 1997. *Testimony of John P. Giesy at the Tahoe Regional Planning Hearing on Boating Impacts*. February 26, 1997.

Heintz, R.A., J.W. Short, and S.D. Rice. 1998. *Sensitivity of fish embryos to weathered crude oil: Part II: Incubating downstream from weathered Exxon Valdez crude oil caused increased mortality of pink salmon (*Oncorhynchus gorbushcha*) embryos*. Environmental Toxicology and Chemistry 18: 3.

Oris, J.T. 1998. *Toxicity of ambient levels of motorized watercraft emissions to fish and zooplankton in Lake Tahoe, California/Nevada*. Center for Environmental Toxicology and Statistics, Miami University, Oxford, OH. April 1998

W7: Plants

Comment: The commenter noted that we did not comply with the Endangered Species Act because we did not complete surveys for sensitive plants (Winner Creek/Twentymile).

Response: The Endangered Species Act covers species that are Federally listed as Threatened, Endangered, or Proposed. The Biological Evaluation completed for plants states that, “[t]he only federally listed plant in Alaska is *Polystichum aleuticum*, which is listed as endangered. It is only known from Adak Island and is not expected to occur in the project area.” The analysis regarding Threatened, Endangered, or Proposed plant species is complete and complies with the ESA. The reference to EA page 36 is regarding sensitive plants that have been identified by the Regional Forester. Forest Service policy regarding management of sensitive species is contained in FSM 2672.1. In addition, the EA on page 36 states that the Winner Creek/Twentymile segment will be resurveyed for sensitive

plants and a biological evaluation completed prior to any ground disturbing activities.

W8: State of Alaska Authority

Comment: The State of Alaska requests that the final documentation recognize the Alaska Department of Fish and Game's (ADF&G) authority to manage all resident fish and wildlife. The Service and the ADF&G committed in a Master Memorandum of Understanding to coordinate and consult on any issues that affect resident fish and wildlife and their uses.

Response: We recognize that ADF&G manages wildlife populations whereas the Forest Service manages wildlife habitat.

Y1: Hydrology

Comment: Commenter did not agree with our conclusion that negative impacts to hydrological resources would be minimal.

Response: The EA identifies that more severe surface erosion and sedimentation may occur with increased snowmachine use during periods of low snow cover (EA p. 32). Although snowmachine use on and off-trail at times of low snow cover can be harmful to the resources, especially on steeper hills and trails, it is the policy of the Chugach National Forest to minimize these negative impacts by closing areas and trails to winter motorized use when snowpack conditions are exceptionally low or insufficient to protect the natural resources. The Forest Service will continue to apply this policy on winter motorized areas of the INHT. Also, the Forest Service will apply trail construction and maintenance standards that comply with the Best Management Practices established to protect water quality (EA, p. 15). Although increased winter motorized use is likely to occur, these preventative factors will accommodate it and minimize the impacts to hydrological resources.

M1: Maintenance

Comment: Concerns were raised over maintenance of existing trails on the South end where flooding has caused the trail to be difficult to access or impassable. Concerns were also expressed over maintenance costs and new trails competing for currently limited dollars.

Response: Under Alternative 1, current maintenance funding levels are not adequate to cover trail maintenance. At current funding levels deterioration of trails can be expected to continue. Flood events in recent years have caused substantial damage, out stripping the capacity of local volunteers and current funding level commitments.

Under all action alternatives trail maintenance money is expected to increase as the length of the trail increases and by designation of a National Historic Trail.

Currently some National Historic and National Scenic Trails receive separate operation and maintenance funding from Congress.

Maintenance of the INHT from Seward to Girdwood will offer a significant challenge. A decision to proceed with any of the alternatives 2, 3, or 4 will mean the rebuilding of old and/or construction of new trail to higher standards for most of the trails. Higher quality will result in lower maintenance cost per mile and insure longevity.

Concern over existing trail conditions on the southern end (between Mile 12 Hill and Nash Road) will be remedied by reconstruction, replacement of damaged culverts, and improvement of fords or installation of bridges. Final trail and bridge design will follow a decision to implement an action alternative.

Rebuilding will be completed with capital funding replacing aging culverts, reconstructing older bridges, and placing tread on solid foundations. Bridge sites will be engineered to minimize effects from flood events, reduce impacts on remote bridges, especially on the flood prone southern end near Seward. The construction of spare bridges and stockpiling spare parts is planned as a part of initial construction to insure maintenance responsiveness. Quality trail construction will set a firm foundation as length is increased, overall costs will increase but, it will also reduce maintenance cost per mile.

Increase trail infrastructure on the Chugach Forest and a National Historic Designation will increase competitiveness for existing operation and maintenance funding for the Forest.

O1: Iditarod Dogsled race

Comment: The commenter is against any expansion of the Iditarod racecourse.

Response: Congress designated the INHT in 1978. The Bureau of Land Management is the Trail Administrator for the INHT and they developed a Comprehensive Plan in 1986. This project has been developed to implement the portion of trail from Seward to Girdwood as discussed in the Comprehensive Plan. The routes in this project would be developed for a number of uses for summer and winter recreation, along with associated heritage resources and sites. The Iditarod Trail Sled Dog Race is a separate event that first ran to Nome in 1973 and commemorates the 1926 Serum Run to Nome. Although the use of sled dogs may be allowed on many segments of trail, this project is not affiliated with the race. The purpose of this project is to implement recommendations made in the 1986 Comprehensive Plan. Decisions regarding the location of the Iditarod Sled Dog Race are outside the scope of this project.

O2: Health and Safety

Comment: The commenter claims the Forest Service did not analyze the health and safety risks associated with shared use trails, specifically concerns regarding snowmachine emissions.

Response: This issue has been adequately analyzed during Forest Plan revision. The following is a summary of that analysis that specifically relates to this project.

Snowmachine emissions include air pollutants and volatile organic compounds. Two-stroke engines emit about 20 to 30 percent of the consumed fuel through the exhaust (Haines 2001, USDI National Park Service 1996). Snowmachine hydrocarbon emission exceeds emissions from most other motor vehicles, with exhaust carbon dioxide levels around 1,000 times higher than an automobile operating at similar speeds (Fussel 1997).

In general, snowmachine use on the Forest is widely disbursed. Snowmachine use may degrade the air quality that currently exists within localized areas of the Forest. Localized short-term high concentrations of carbon monoxide and other pollutants would occur where snowmachines are used. Snowmachine use would diminish the air quality in areas where high concentrations of snowmachines assemble. Relative to the INHT, these are primarily the Turnagain Pass and Lost Lake areas. Turnagain Pass is part of all action alternatives and Lost Lake is included in Alternative 4.

Studies within the West Yellowstone, Montana area have found levels of snowmachine generated carbon monoxide that have exceeded federal standards. These occurrences are primarily during days of high snowmachine traffic, with over 1,000 snowmachines moving through the National Park entrance per day, and during periods of air stagnation and temperature inversions. In comparison, use is much less and snowmachine traffic patterns are less concentrated within the Chugach National Forest. The Turnagain Pass area has the highest snowmachine use concentrations on the Forest. Use studies of motorized and nonmotorized users (Skustad 2001) have indicated significantly less use intensities compared to West Yellowstone use patterns. Maximum use counts indicated a peak of 100 vehicles per day associated with snowmachine users. Generally, use was less than 50 vehicles on weekend days. Weekday numbers averaged around 10.

Unlike West Yellowstone, the Turnagain Pass and Lost Lake areas are not in a mountain basin prone to air stagnation due to temperature inversions. Present use of the areas indicates no visibility impairment (Skustad 2001). While Chugach National Forest personnel have undertaken no measurement of carbon monoxide or nitrogen oxides within the Forest, the relatively small number of snowmachine users in the area indicates that impacts to air quality from carbon monoxide or nitrogen oxide levels would be minor. Even with a potential increase in snowmachine use, this diminishment of air quality would likely be below federal standards for pollution. Future monitoring may be needed to verify that these standards are not being exceeded.

References Cites:

Fussel, L. 1997. *Exposure of Snowmobile Riders to Carbon Monoxide*. Park Science 17 (1) pp. 1, 8-10.

Haines, H. 2001. *The Snowmobile Dilemma, Lab Results*. Montana Department of Environmental Quality. 6 p.

<http://www.deq.state.mt.us/ppa/p2/snowmobl/snowbl.htm>.

Skustad, C. 2001. *Glacier Ranger District, 2000-2001 Winter User Count Data*, USDA Forest Service, Chugach National Forest, Glacier Ranger District, Girdwood, Alaska. 8 p.

USDI National Park Service. 1996. *Restricted Winter Use Report, Voyageurs National Park (1992-1996)*. Voyageurs National Park, International Falls, MN.

L2: Railroad Land

Comment: The Alaska Railroad commented that no distinction is made between “State” land and “railroad” land. Railroad land is distinct and different from State land and impacts of the Trail on Railroad lands must be considered separately from land managed by other State agencies.

Response: Page 42 of the EA clearly considers railroad land separately from State land under the Lands section. Table 5 and table 6 each have a row for railroad lands to be crossed by the trail, making a distinction between the way railroad land was considered and other State lands were considered.

In the Landownership and Land Use Rights Report in the Project File a clear distinction between railroad lands and State lands is made. For example, it states: “A major linear feature that intersects the project area corridor in several locations is the Alaska Railroad right-of-way. This railroad right-of-way was conveyed out of federal ownership to the State of Alaska under the Alaska Railroad Transfer Act of 1982 (P.L. 97-468; 96 Stat. 2556). It is a State owned railroad that has ownership of the right-of-way and associated other properties.” and “The lands that contain the railroad track right-of-way are owned and managed by the State owned Alaska Railroad Corporation. There currently exist problems with public trespass of the railroad right-of-way. Any proposed Forest Service crossing of the right-of-way will require obtaining an easement or long-term permit from the Alaska Railroad Corporation”. The report goes on to analyze the effects of the proposed alternatives and continues to recognize railroad land as different from other State lands.

L4 and L5: Moose Pass Pedestrian Crossing

Comment: The Alaska Railroad is concerned that trespass over their trestle in Moose Pass would increase with the proposed activities. In addition, they fear that trail users will elect to cross on the railroad bridge at Moose Pass and follow the tracks rather than the trail. They feel that carefully constructed access at Moose pass may mitigate this problem.

Response: Alternative 4 includes a footbridge at Moose Pass that would address this concern. See EA pages 12-13.

L6: Trail Creek Pedestrian Crossing

Comment: Currently the Railroad trestle at Trail Creek is illegally used as a pedestrian crossing. This dangerous, unsafe practice could also be mitigated or eliminated by the construction of a parallel and separate bridge. There is no way to make the Railroad bridge at Trail River safe for pedestrian use. The trail must cross on a separate bridge outside the Railroad right-of-way.

Response: All action alternatives include a separate pedestrian bridge to address this concern. Use of the railroad crossing at Trail Creek by pedestrians has been identified by the Alaska Railroad as an illegal, dangerous, and an unsafe practice. The Forest Service has proposed to build a separate pedestrian bridge to access the INHT in all action alternatives.

L7: Railroad Pedestrian Stations

Comment: The Alaska Railroad commented that comfort and protection from the natural elements for passengers waiting for the Railroad passenger train during inclement weather might suggest the construction of pedestrian railroad stations. Minimally, drop-offs should have a stable platform for passengers for good footing and a waiting area comfortably and safely away from the track.

Response: Constructing stations for Alaska Railroad passengers are outside the scope of the project.

L9: Railroad Concerns Near Girdwood

Comment: The Alaska Railroad is concerned about the proposed trail alignment near the tracks. They believe the trail should not cross the tracks at grade or parallel the tracks closer than 70 feet.

Response: The Chugach National Forest recognizes the Alaska Railroads property rights and would not cross the tracks except in an area where the railroad has agreed and provided a permit or easement for public crossing. The Forest Service trail would not parallel the tracks on Alaska Railroad lands without these rights being granted by the railroad. If on National Forest lands and the location present a safety issue related to the railroad, the Forest Service would like to work with the Alaska Railroad to mitigate these safety issues. In the Girdwood area, the trail would be outside the National Forest and under the jurisdiction of the Girdwood Trail Authority. The Chugach National Forest is working as a partner to help facilitate the establishment of a continuous route for public use, however, in Girdwood it is not planned for the trail to be a National Forest land interest.

C1-C4: Chugach Alaska Corporation Concerns

Comment: The CAC is concerned about impacts to their land if the INHT was located on a federal easement (CNI 13.6) through their land. They are concerned about trespass, littering and vandalism. They are concerned about the location of a trailhead in their Snow River tract and believe that a better location would be immediately south of the Snow River tract on public land.

Response: Forest Service personnel acknowledged the private land issues raised by CAC and in a June 2003 meeting indicated to CAC that a serious attempt to locate the INHT to avoid CAC lands would be made. The alternatives in the EA were shown to cross the CAC parcel because the United States holds an easement right under the 1982 CNI Settlement Agreement across this land. This route was a feasible and efficient route to access the public land for the INHT. A route that would avoid CAC lands that was a minor reroute was mapped due to CAC concerns and the Forest Service's willingness to address these concerns.

This minor reroute was field verified and is considered a feasible and efficient route for the INHT that would avoid CAC lands. This is clarified in the Decision Notice.

N1: Concerns Regarding Access to Mining Claims

Comment: There were concerns that the none of alternatives would allow summer motorized use on known mining roads to access mining claims.

Response: None of the alternatives would change or eliminate any of the rights associated with ownership of mining claims (EA page 38 and Minerals Report in Project Record). Also see Mitigation Measure on page 16 of the EA that discusses miner's use of ATVs on trails that are closed to general public ATV use.