Rachel James

December 15, 2003

Re:ANILCA Section 1110(a) Traditional Activities

Dear USFS Iditarod National Historical Trail Planners,

Thank you for the opportunity to comment on the Seward to Girdwood Iditarod National Historical Trail (INHT) Project. I am a Girdwood resident and a lifelong Alaskan resident and appreciate the chance to be involved in the public process. When I first heard about the INHT Project, I was very excited. It is an opportunity for communities to become involved in trail building, interpretive projects, and will give the communities of Seward, Moose Pass, and Girdwood and Whittier something positive to organize around. Since I have learned more about the INHT project, I have become excited about the summer trail route ideas and apprehensive about motorized winter use. The possibility that the entire route could become a snowmachine thoroughfare is frightening. My concerns are based on the legal context of CSU management and ANILCA, the social and physical resources in the Glacier Ranger District, and the spirit of the historic trail. I understand that this comment period is not for analysis of the Environmental Assessment, rather it is to help the USFS to determine if snowmachining on the INHT would be detrimental to the other resource values in the area. I hope my comments will convince land managers and decision makers that allowing snowmachining on the entire INHT and surrounding areas that are currently closed to winter motorized use would be detrimental to the resource values of the USFS lands, as well as surrounding private and public lands.

Section 1110(a) of ANILCA and Traditional Activities

I attended the December 4 hearing at the Prince Hotel in Girdwood. Although I think the hearing was a good public discourse between the Forest Service, commercial snowmachining community, and backcountry users, I disagree that the hearing should have taken place. To have an ANILCA 1110(a) hearing is to acknowledge that snowmaching is a traditional activity. ANILCA did not intend to open up Conservation System Units to recreational snowmachine use. After reading section 1110(a) many times, it seems to me that it allows snowmachine use for access for utilitarian purposes in the context of pre-ANILCA Alaska, for the activities that are necessary to live a rural lifestyle:

> *"...the Secretary shall permit, on conservation system units...the use of snowmachines, motorboats, airplanes, and nonmotorized surface transportation methods for traditional activities (where such activities are permitted by this Act or other law) and for travel to and from villages and homesites."*

I also noticed that this section is listed under the heading Special Access and Access To Inholdings in ANILCA. If the intent was to open up recreational snowmachine use in

CSUs, why didn't Congress explicitly say "open to snowmachines"? Congress left the language open to interpretation by the Federal agencies. The USFS has the ability to interpret the language of ANILCA, staying true to the intent of the Act. It doesn't seem to me that opening the INHT to recreational snowmachining, and especially the land of upper Winner Creek is staying true to the intent of this section ANILCA.

The NPS interprets section 1110(a) of ANILCA as the following: "a traditional activity...involves the consumptive use of one or more natural resources such as hunting, trapping, fishing, berry picking or similar activities. Recreational use of snowmachines was not a traditional activity." Perhaps the USFS could adopt this interpretation as well. It would fit the multiple-use mandate of the USFS and stay true to the intent of Congress.

I hope that this letter as well as the pleas of users in the area and the articulate arguments of conservation groups from around the country will convince the USFS to define traditional activities with regard to snowmachines. I realize that is unrealistic before this project is complete so the rest of my comments will assume that snowmachining will be allowed in the INHT CSU.

Deleterious Affects of Snowmachines: Social and Physical

I believe opening previously closed areas to winter motorized use would degrade the resource values of the physical ecosystem, as well as other recreational users. A shared trail is an approach that seems like a 50-50 compromise. It is not: skiers end up yielding their experience to the motors. I have skied on shared trails in the Lolo National Forest in Montana, the Wallowa National Forest in Washington, and on shared trails in Alaska. I prefer not to ski on them because I feel in danger and the experience is unpleasant. When the trails are made very wide to accommodate skate skiers and snowmachiners, the machines tend to drive faster. When the trail is narrow, the exhaust, noise, and speed are intimidatingly close to skiers.

To my knowledge, there is not enough research about the impacts of motorized recreation on the physical resource values to determine if snowmaching would not affect the other resources of Glacier Valley. If the upper reaches of Twentymile River and the headwaters of Winner Creek were open to recreational snowmachining, I would be very concerned about the refugia that those valleys provide to animals in the winter. To the north of Winner Creek drainage, there are few non-glaciated valleys for animals to winter in. Before even considering the management decision of opening the upper Winner Creek drainage, I would encourage a thorough assessment of the physical resources to determine if there are denning bears, mountain goats, and other animals that use the drainage annually. The enjoyment of recreational snowmachiners is not worth the displacement and disturbance of animals that inhabit the area.

Spirit of a Historic Trail

Motorizing the INHT does not acknowledge the historic use of the trail. When I think about the spirit of a National Historic Trail on federal land, such as the historic Chilkoot Trail managed by NPS north of Skagway, or the Lewis and Clark Historic Trail in Montana, I think of paying tribute to the original users and learning about a period of history. When I walk on the section of the Iditarod Trail up Crow Creek Road in I feel a sense of amazement that I am walking on the same route that the mushers blazed. I truly believe that if the entire route were open to mechanized use in the winter, the social

resource values would be drastically degraded. The idea of opening up large areas previously closed areas to backcountry snowmachine use, under the Iditarod National Historic Trail Project, is unacceptable to me and many others in Girdwood. I believe that using the INHT to enhance the commercial opportunities for local companies that offer winter motorized experiences is also contrary to the spirit of a historic trail.

Of the four alternatives for the Girdwood Portion of the INHT, I support Alternative 2. I do not support any increased access or opening in Twentymile beyond what presently exists. I do not support a shelter constructed on Blueberry Pass. I am vehemently opposed to Alternative 3 that would allow snowmaching on the summer trail from Peterson Creek to Winner Creek.

I urge the USFS not to revise the Chugach Forest Plan to open previously designated closed areas to motorized use. Please do not use this project to hand-over more land to cross-country snowmachine use in more valleys and ridges that were previously closed. I am aware of the State's interest in asserting the Crow Pass RS 2477 Right-of-way and would hope that the INHT project would not accelerate or assist the speed of that assertion, ultimately allowing the claimed ROW to be managed for motorized use, or worse, construction of a highway under the legal language of RS 2477.

I anticipate that if the USFS and the State of Alaska DNR continues to yield to motorized interests, the infiltration of helicopters and snowmachines will further add fuel to conflicts between the motorized and non-motorized communities. Please take the opportunity through this planning effort to create a historic trail that will bring people together and give them a common like through a corridor that honors the traditional travel of the original users; please don't create a snowmachine superhighway. Lastly, please consider the other land managers, such as the pro-motor DNR, in bigger picture of winter motorized use when you make your final decision on the management of the INHT.

Thank you for considering my comments, I do *greatly* appreciate all of your hard work on our public lands!

Sincerely,

Rachel James