

Dear Betty:

Below are the comments of the Alaska Center for the Environment and the Sierra Club on management considerations under ANILCA Section 1110(a) as they pertain to the proposed Iditarod National Historic Trail project. Please also see ACE's earlier comments, dated July 16, 2003, on the EA for the proposed project.

We're in an odd situation. We believe, as we have explained many times, that the Forest Service has made a major error in interpreting "traditional activities" under Section 1110(a) to include recreational snowmachining. We think this is clearly contrary to Congress's intent and to the law, as we believe the courts will eventually find. Consequently, we believe that the present hearings and public comment period are unnecessary; closing these trail segments to recreational snowmachining does not in fact close them to a traditional activity.

Additionally, we commented in July, and we still believe, that the Forest Service should adopt the No Action alternative. This relatively lengthy trail is likely to be highly popular with motorized users. Building it would virtually certainly result in increased snowmachine use in the area (both on and off the trail, including in areas presently closed to recreational snowmachining), and therefore increased conflicts (in a region where the conflicts are already substantial) and increased resource damage.

Nevertheless, the Forest Service's apparent desire to go forward with this project forces us, until the Section 1110(a) issue has been litigated, to attempt to protect the resource values of the relevant trail segments from the adverse effects of recreational snowmachine use.

Recreational snowmachining in the area will be detrimental to significant resource values. We didn't see any references in the EA to the literature regarding the adverse effects of snowmachines. Alaskan discussions of this issue include the one in the revised Chugach National Forest Management Plan EIS, which though inadequate might be helpful. The best Alaskan discussion is probably the Denali National Park EA regarding the maintenance of the closure to snowmachining of the Park's core Wilderness area. In the lower 48, the Yellowstone National Park winter use EIS might be the most thorough discussion of the adverse effects of snowmachining on natural resources and values.

Snowmachines degrade a wide variety of resources and values. We'll merely list some of them here since more detailed discussions are available elsewhere (see immediately above). They pollute air and water; they damage soils and vegetation; they harm wildlife; they degrade the natural soundscape (natural quiet and natural sounds); they scar otherwise beautiful snowscapes; and they destroy solitude and other wilderness values. All of these impacts affect not only Alaskans but our visitors as well—and the businesses that seek to offer a unique Alaskan wilderness experience for their clients. Even if recreational snowmachining were in fact a "traditional activity" under Sec. 1110(a), this activity is clearly "detrimental to the resource values" of the area and can—and should—be prohibited by the Forest Service. Both present and future Alaskans and visitors deserve from the Forest Service both responsible long-term stewardship of the Chugach's special resources and values and a fairer and more balanced allocation of winter recreation opportunities.

Thank you for considering these comments.

Sincerely,

Cliff Eames

Betsy Goll

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