THE WILDERNESS SOCIETY

Betty Charnon
Glacier Ranger District
Chugach National Forest
P.O. Box 129
Girdwood, AK 99587-0129

December 15, 2003

Re: Iditarod National Historic Trail ANILCA 1110(a) Closures

Dear Ms. Charnon,

Thank you for the opportunity to comment on the ANILCA 1110(a) closures for Crow Pass, Winner Creek, and Portage Valley proposed in the Iditarod National Historic Trail (INHT) Environmental Assessment.

The Wilderness Society (TWS), founded in 1935, is a non-profit membership organization devoted to preserving wilderness and wildlife, protecting America's prime forests, parks, rivers, deserts, and shorelines, and fostering an American land ethic. With 200,000 members nationwide, TWS has approximately 676 members in Alaska, many of whom visit the Chugach National Forest and are concerned about the management our Nation's natural resources and roadless areas.

TWS does not support any of the action alternatives in the INHT EA (see attached EA comments). However, faced with the possibility of the trail we do support the subsequent ANILCA 1110(a) closures for Crow Pass, Winner Creek, and Portage Valley. TWS strongly opposes any increase in motorized access on the Chugach National Forest. The Chugach Land Management Plan (CLMP) opened more than 87% of the Forest to cross-country winter motorized travel (calculated from FEIS, Table 3-68, p. 3-410). We believe the INHT project, which was never discussed during the exhaustive CLMP public process, will have a deleterious impact on scarce non-motorized areas remaining on the Forest.

Studies have documented the devastating impacts caused by winter motorized use on wildlife populations, natural soundscapes, air and water quality, visitor safety, and visitor experience. TWS strongly believes that the winter-motorized use of the INHT will be detrimental to Chugach resource values. TWS supports the proposed closures for the following reasons:

- ***Impacts of Recreational Snowmachine Use on Wildlife***

The Kenai Peninsula is road accessible from Anchorage and is a very popular recreation area in southcentral Alaska. Snowmachines and other motorized uses on the Kenai have increased dramatically in the past decade. Additionally, the Kenai Peninsula overall has experienced a lot of development on private lands, including subdivisions and large-scale logging. These factors have all contributed to the stress on and decline of many wildlife populations on this region of the Forest.

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Winter motorized use could well be a factor in the Kenai Peninsula moose population decline. A Summary Report on the Alaska Moose Fecal Glucocorticoid Project, which analyzed stress hormones from moose fecal samples in areas with or without frequent snowmachine use, demonstrates that moose in high snowmachine use areas experience significantly greater physiologic stress, on average, than moose in areas of low snowmachine use. Moose are often found in the flats along Winner Creek and in parts of Portage Valley. TWS believes that the continued advancement of additional motorized recreational opportunities on the Kenai Peninsula, during the most stressful time of the year, will negatively effect this population.

Excessive snowmobile use may also displace wolves, brown bears, and other species from critical habitats, travel corridors, and den sites. Indirectly, the noise generated by snowmachines, can also adversely impact animals impairing feeding, breeding, courting, social behaviors, territory establishment and maintenance, increasing stress, and/or by making animals or their young more susceptible to predation.

In Voyageurs National Park, research has demonstrated that gray wolf activity in specific bays appears to occur when snowmobiles are not present (DOI/VNP1996). The report concludes that, "A biological interpretation of these results indicate wolves tend to avoid snowmobile activity in restricted use areas. It is reasonable to assume that a disturbance-threshold exists where repeated avoidance by or displacement of an animal may result in: (1) more permanent replacement of the wolf or wolves; (2) impact on an individual animal's winter energy budget as to adversely affect productivity or survival; or (3) conditioning the animal to avoid certain areas."

The primary habitat of the elusive twenty-mile wolf pack is open to and is heavily used by snowmachines. Members of the pack often travel over the pass to Winner Creek in search of food and possibly to retreat from snowmachine noise and associated disturbances to hunting. We believe that the introduction of snowmachine use to additional areas within this population's range, namely Winner Creek and possibly Portage Valley, will adversely impact the viability of this population.

In recent years there have been frequent sightings of brown bear tracks along the Winner Creek trail, which is believed to be a route commonly used by brown bear. Tracks in the snow have been seen as early as April and there is a high likelihood that brown bear dens exist on the Girdwood side of the pass. Recent studies in Yellowstone National Park have made it clear that indirect impacts from snowmachines are adversely affecting brown bear. Indirect impacts result from the altered distribution and movement patterns of large ungulates caused by snowmobile trail use. This leads to a subsequent decrease in the availability and accessibility of critical brown bear food sources (NPS\YNP 1990; Mattson 1997). The use of snowmachines along the Winner Creek trail could also potentially increase human/bear encounters and contribute to the habitualization of bears within Girdwood.

- ***Impacts of Recreational Snowmachine use on Air and Water Quality***

In Yellowstone, toxic raw fuel and air emissions accumulate in the snowpack along rivers, streams and lakes where snowmobile roads are most common. Ingersoll et al. (1997) found increased levels of sulfates and ammonium in Yellowstone's snowpack compared to baseline conditions. Pollutants "locked" in the snowpack are released very rapidly during the first few days of snow melt. Researchers have found that 80 percent of acid concentrates are released in the first 20 percent of snowmelt, and that this acid pulse is a major cause of death for aquatic insects and amphibians (Rawlins 1993). This acid pulse may also reduce the acid neutralizing capacity of aquatic systems, particularly those found at high elevations which typically are less

capable of neutralizing acid deposition. In one study, Charette et al. (1990) determined that "during the spring melting, the massive liberation of atmospheric pollutants accumulated in the snow cover is connected to a very important increase of acidity, which may be more than 100 times higher than the usual acidity level in surface water."

In addition, two-stroke engines also discharge much of their fuel mixture, unburned, directly into the environment. Unburned fuel contains many toxic compounds including benzene, toluene, xylene and the extremely persistent suspected human carcinogen Methyl Tertiary Butyl Ether (MTBE). MTBE is a concern in snowmobiles for two reasons: 1) because these vehicles spill large quantities of unburned fuel into the environment, up to 15% of which is MTBE; and 2) because these vehicles produce very high emissions containing carcinogenic MTBE combustion by-products. In Yellowstone, for example, snowmobiles can dump from one-third to three-quarters of a gallon of MTBE directly into the environment every two hours.[1]

- ***Motorized/Non-Motorized User Conflicts***

Motorized recreation in Crow Pass, Winner Creek, and Portage Valley will negatively affect the visitor experience by impacting views, soundscape, safety, and opportunities for solitude and wildlife viewing. Winner Creek is presently the only non-motorized area that affords lowland skiing opportunities for residents of the Girdwood area. The area is a popular destination cherished by non-motorized users for skiing, snowshoeing, and hiking. Portage Valley is a popular area for ice climbing. If these presently non-motorized segments of the INHT were to become motorized it would displace non-motorized users and further diminish scarce non-motorized recreation opportunities on the Forest.

- ***Health and Safety Risks***

In addition to high risks of collision between motorized and non-motorized users, the operation of two-stroke engines on trails creates dangerous levels of airborne toxins including nitrogen oxides, carbon monoxide, ozone, particulate matter, aldehydes, 1,3 butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons (PAH). The EPA lists several of these compounds as "known" or "probable" human carcinogens. Benzene, for instance, is a "known" human carcinogen and several aldehydes including butadiene are classified as "probable human carcinogens." All are believed to cause deleterious health effects in humans and animals well short of fatal doses (EPA 1993).

- ***Municipal Land Use Conflicts***

In 1999, the Girdwood Board of Supervisors unanimously passed Resolution 99-1, in an effort to keep snowmachine use out of the Girdwood Valley. If the Forest Service authorizes snowmachine use in Crow Pass and Winner Creek it will undermine the expressed desire of the community and impact the quality of life for Girdwood residents. Furthermore, the Winner Creek trail abuts municipal lands on which snowmachine use is prohibited. Users accessing the trail from Girdwood would have to cross these municipal lands, thus would result in illegal snowmachine use on adjacent municipal lands.

- ***Fulfilling the intent of ANILCA: Traditional Activities***

Section 1110(a) of the Alaska National Interest Lands Conservation Act (ANILCA) allows for the use of snowmachines, motorboats and fixed-wing aircraft for traditional activities and for travel to and from villages and homesites in Conservation System Units (CSU's). It is essential that the definition of "traditional activity" adopted for snowmachine use in the Old Park of Denali

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[1] Calculation based on average fuel consumption (USEPA), percentage of fuel emitted as raw fuel (25-30%, USEPA), and percentage of oxygenated fuel that is MTBE (11-15%, OFA).

(36 CFR § 13.63(h)(1)) also be adopted by the Forest Service. This definition mirrors the purpose and intent of ANILCA. The bill's legislative history makes it clear that recreational snowmachining is not a traditional activity for which Congress meant to preserve access or use. The Park Service definition for Old Denali prevents a misinterpretation of the traditional activity concept, while accommodating for human activities that are necessary and essential for "rural residents engaged in a subsistence way of life to continue to do so." (16 U.S.C. § 3101).

TWS supports use of snowmachines for access for traditional activities in areas of the CSU where such traditional activity and motorized use was established prior to the enactment of ANILCA. However, we also believe that ANILCA requires motorized access for traditional activities to be managed in accordance with reasonable regulations to protect the natural and other values of the CSU.

ANILCA section 1110(a) provides specific authority to restrict or close areas to motorized use for traditional activities where the Forest Service determines the use is detrimental to CSU values. The Forest Service has an affirmative responsibility to monitor resource conditions and uses within the National Forests in Alaska and to take protective measures before damage occurs. The Wilderness Society believes the INHT will cause significant and irreversible adverse impacts to the scarce non-motorized areas remaining on the Forest. Thus at the very minimum, we urge the Forest Service to keep Winner Creek, Portage Valley, and Crow Pass closed to motorized use.

Respectfully Submitted,

Kate Taylor
Alaska Regional Associate

cc: Joe Meade, Forest Supervisor