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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 in the Iditarod National Historic Trail (INHT) Environmental Assessment (EA). I am writing on behalf of the Alaska Quiet Rights Coalition (AQRC), a statewide organization focused on the social impacts of motorized recreational vehicle use and dedicated to promoting the right and the opportunity of the public to enjoy areas of natural sounds and natural quiet on public lands and around their homes, cabins and recreational areas. The Wilderness Society joins in these comments.

AQRC does not support any of the action alternatives in the INHT EA. However, faced with the possibility of the National Historic Trail, we support the closures to the use of snowmachines for traditional activities under Section 1110(a) for Crow Pass, Winner Creek, and Portage Valley. The Quiet Rights Coalition strongly opposes any increase in motorized access on the Chugach National Forest. Natural quiet, and the opportunity to hear and enjoy natural sounds—a raven's wing beats, falling snow, the wind in the trees—is an essential natural resource, and as much a part of the natural world as fish, wildlife, trees, shrubs, wildflowers, scenic beauty, wilderness, or clean air and water. Its presence is critical to our physical, mental, emotional and spiritual health. Wildlife depends on it in ways that we are only now beginning to learn.

Until very recently, natural quiet was taken for granted. The idea that it could be lost was inconceivable. Now, however, although there are still quite a few places (in Alaska, the rest of the country, and the rest of the world) that look like they did 200 years ago, there are almost no places that sound like they did just one or two decades ago. The Chugach Land Management Plan (CLMP) opened more than 87% of the Forest to cross-country winter motorized travel (that figure was before the agency changed course for the previously non-motorized Carter/Crescent Lake areas, so the percentage would actually be significantly higher). We believe the Iditarod National Historic Trail project, which was never discussed during the exhaustive CLMP planning process, will have a deleterious impact on the few non-motorized areas remaining on the Forest.

As we stated in our comments on the INHT environmental assessment, the Quiet Rights Coalition believes that the Forest Service errs in interpreting "traditional activities" under ANILCA Section 1110(a) to include recreational snowmachining. This is contrary to Congressional intent. In Section 1110(a), entitled "special access," Congress meant to preserve the right of local people to carry on consumptive, utilitarian lifestyle activities. In the legislative history of this section, the House Report makes clear that Congress intended to preserve "access. . . for traditional or customary activities such as subsistence and sport hunting, fishing, berrypicking, and travel between villages." H. Rep. 96-97, Part 1 at 238-39 (April 18, 1979). The Senate Report, adopted at the conclusion of the ANILCA legislative process, echoes this sentiment. See S. Rep. 96-413 at 247-48 (1980), reprinted in 1980 U.S.C.C.A.N. 5191-92 (mentioning "subsistence and sport hunting, fishing, berrypicking, and travel between villages"). Thus both the legislation and the legislative reports make clear that Congress intended to authorized continued access in conservation system units by snowmachine through Section 1110(a) -- but only where these forms of transportation had been traditionally used for consumptive activities in a

particular area prior to ANILCA.

Nonetheless, since it appears that the Forest Service intends to go forward with this project, we write to point out the well-established detrimental impacts caused by snowmachines on natural soundscapes, visitor experiences, wildlife populations, vegetation, and air and water quality.

Federal agencies have studied the impact that snowmachines have on Wilderness values and on visitors to protected federal lands.[1] For instance, the Park Service recently concluded that snowmobile use in Denali National Park would result in several impacts to Wilderness values and solitude, including:

- Winter snowmobile trails would be visible in the summer due to snow compaction, delayed melting, and subsequent vegetation changes;
- User conflicts would be widespread between snowmobile users and other recreationists, including dog-mushers, cross-country skiers, and skijors;
- Natural quiet, solitude, and undisturbed vistas would be diminished, and associated Wilderness values would be significantly reduced, marring visitors' experience; and
- One of the only areas in Alaska where winter recreation has been managed for non-motorized activities would be lost.

NPS, "Environmental Assessment for Proposed Permanent Closure," Nov. 1999 at 41-44.[2] The studies cited by the Park Service acknowledged that while non-motorized users such as dog mushers or cross-country skiers were negatively impacted by the presence of snowmobiles, snowmobilers tended to be more indifferent to non-motorized users. That is because snowmobile engine noise would likely interrupt any feeling of solitude available to a non-motorized recreationist, as found in the Sawtooth National Recreation Area. Snowmobile noise can be heard up to two miles away -- with the noise easier to hear along ridges of a forested area -- and snowmobile sounds travel even farther when the motorized use occurs above treeline and during colder weather, such as would be the case for use in many of the proposed areas of the INHT. In visitor use surveys conducted in Yellowstone and Grand Teton National Parks, visitors reported that the noise, pollution, and impacts to wildlife from snowmobile use were "the least enjoyable part of the national park experience." Also, due to the lingering impacts of compacted trails and the fact that winter trails are visible in the summer, snowmobile use in the winter could negatively affect visitor experience of the Chugach in the summer months as well.

Moreover, agencies have studied and documented the direct, indirect, and cumulative impacts of snowmobile exposure on wildlife behavior and population levels.[3] Snowmachines cause direct impacts through harassment -- some intentional, some not -- that injures or kills wildlife, as well as indirect impacts from disturbance, changes in distribution, and elimination of the use of preferred habitat. The noise, odor, intrusion, and harassment from snowmobiles causes stress to wildlife, which could cause species to abandon preferred habitat in areas of the Chugach.[4] Moreover, the natural flight response to snowmobile use would result in adverse energy expenditure during the winter season, when energy expenditure can be high already. Also, snowmobile tracks compressing the snow could adversely affect subnivean animals (mice, voles) by creating snow barriers to movement and by killing individual animals. And, finally, compacted trails from snowmobiles would change the wildlife distribution patterns that have developed naturally in the Forest, because these trails provide energy-efficient, packed down travelways.[5]

The detrimental impacts of snowmachine use on vegetation, soils, and wetlands is well known.[6] Snowmobile use in vegetated areas resulted in considerable changes in species composition and plant density, as well as abrasion and breakage of exposed vegetation including seedlings, shrubs, and young trees. Even when there was adequate snowcover to prevent direct abrasion of vegetation, studies have found that the compacted trails formed by snowmobiles affect the subnivean environment by causing major temperature reductions and changes in snowpack characteristics. These changes, in turn, alter species composition, change plant density, delay the melting of compacted winter trails, and provide moisture over a longer period of time to the vegetation in the trail area. Studies show that temperature reductions also change soil surface microstructure, which reduces the suitability of a site for seed germination, the storage organs of perennial plants, and spring wildflower viability. Soil compaction also increases surface runoff, reduces infiltration of the soil, impedes the exchange of gas between soil and air, and inhibits root growth.

Finally, snowmachines have serious impacts on air and water quality.[7] Studies have found that snowmobile

emissions include hazardous air pollutants and volatile organic compounds, and that snowmobiles' two-stroke engines emit about 30 percent of the consumed fuel unburned through the exhaust. Discharges from snowmobiles' two-stroke engines can lead to indirect pollutant deposition into the top layer of snow and subsequently into the associated surface and ground water. One study cited has found that high concentrations of lead and hydrocarbons were left behind in pool water adjacent to snowmobile trails during the week following ice-melt, and that "fingerling brook trout showed lead and hydrocarbon uptake from surface water and food chain feeding as well as reduced stamina." See Adams, S. E. 1975. Effects of lead and hydrocarbons from snowmachine exhaust on brook trout *(Salvalinus fontinalis)*. Transactions of the American Fisheries Society: 104(2): 363-373.[8] The U.S. Environmental Protection Agency has concluded that snowmobiles and all-terrain vehicles produce about 15 percent of all hydrocarbons emitted by mobile sources.

The above discussion makes clear that snowmachine use on the Iditarod National Historic Trail will have detrimental impacts on the resources and values of the affected CSUs on the Chugach. We urge you to prohibit the use of snowmachines on the INHT. Thank you for this opportunity to comment.

Sincerely,

Trisha Herminghaus
Board President

cc: Joe Meade, Forest Supervisor

(Footnotes)

[1] See, e.g., Jackson, E.L., and R.A. Wong, 1982. Perceived conflict between urban cross country skiers and snowmachiners in Alberta. Journal of Leisure Research, First Quarter: 101-110; Littlejohn, M. 1996. Yellowstone National Park Visitor Study. Univ. Idaho, Cooperative Parks Study Unit. Report 75; Littlejohn, M. 1996a. Visitor Services Project Grand Teton National Park Visitor Study. Project Report 74. Univ. Idaho Cooperative Park Studies Unit; U.S. Forest Service. 1998. Stateline snowmachine environmental assessment. Lolo National Forest, Missoula, MT. 83 pp.

[2] This EA is available on the internet at www.nps.gov/dena/home/planning/snowmobile.html.

[3] Aune, K. E. 1981. Impact of Winter Recreationists on Wildlife in a Portion of Yellowstone National Park, Wyoming. M.S. thesis, Montana St. Univ., Bozeman. 111 pp.; Dorrance, M. J., P. J. Savage, and D. E. Huff. 1975. Effects of Snowmachines on White-Tailed Deer. J. Wildl. Manage. 39(3):563-569; Freddy, D. J., 1977. Snowmachine Harassment of Mule Deer on Cold Winter Ranges. Job Progress Report, Deer-Elk Investigations. Colorado Division of Wildlife. Project No. W-38-R-32; Moen, A.N. 1976. Energy Conservation by White-Tailed Deer in the Winter. Ecology 57: 192-198; Neumann, P. W. and H. G. Merriam. 1972. Ecological effects of snowmachines. Can. Field-Nat. 86: 207-212; Rudd, L.T., and L.L. Irwin. 1985. Wintering moose vs. oil/gas activity in western Wyoming. Alces 21: 279-298; Simpson, K. 1987. The effects of snowmobiling on winter range use of mountain caribou. B.C. Minist. Environ. Parks Wildl. Working Rep. No. WR-25. 13pp; Tyler, N. J. C. 1991. Short-term Behavioural Responses of Svalbard Reindeer to Direct Provocation by a Snowmachine. Biological Conservation (56). pp. 179-194; Voyageurs National Park. 1996. Restricted winter use report. Voyageurs National Park (1992-1996). Voyageurs National Park, International Falls, Minnesota. 21pp.

[4] Goodrich, J. M. and J. Berger. 1994. Winter recreation and hibernating black bears *Ursus americanus*. US. Biol. Conserv. 67(2): 105-110; Watts, P.D., and C. Jonkel. 1989. Energetic cost of winter dormancy in grizzly bear. Journal of Wildlife Management 54(4): 654-656; MacArthur, R.A., V. Geist, and R.H. Johnson. 1982. Cardiac and behavioral responses of mountain sheep to human disturbance. Journal of Wildlife Management 46: 351-358.

[5] Meagher, M., S. Cain, T. Toman, J. Kropp, and D. Bosman. 1994. Bison in the greater Yellowstone area: status, distribution, and management. Paper presented at the National Brucellosis Symposium. Jackson Hole, Wyoming; Fancy, S. G., and R. G. White. 1985. Energy expenditures by caribou while cratering in snow. Journal of Wildlife Management. 49(4):987-993.

[6] Greller, A.M. 1974. Snowmachine impact on alpine tundra plant communities. Environmental Conservation 1(2): 101-110; Keddy, P.A., A.J. Spavold, and C.J. Deddy. 1979. Snowmachine impact on old field and marsh vegetation in Nova Scotia, Canada: An experimental study. Environmental Management 3(4): 409-415; Neumann, P. W. and H. G. Merriam. 1972. Ecological effects of snowmachines. Can. Field-Nat. 86: 207-212; Pesant, A.R., C. Fernet, L. Belzile, and J.L. Dionne. 1985. Effects of snowmachine traffic on yield and botanical composition of forage stands in Quebec. Canadian Journal of Plant Science 65(3): 543-552; Pesant, A.R. 1987. Snowmobiling impact on snow and soil properties and on winter cereal crops. Canadian Field Naturalist 101(1): 22-32; Rongstad, O. J. 1980. Research needs on environmental impacts of snowmachines. In Andres, RN.L. and P. Nowak Off-Road Vehicle Use: A Management Challenge. USDA, Wash. D.C. pp. 220-227; Tietz, K.S. 1996. Standardized trampling in interior Alaska taiga ecosystem: impact evaluation. M.S. Thesis, Univ. of Alaska, Fairbanks, Fairbanks, AK. 67 pp.; Wanek, W.J., and L.H. Schumacher. 1975. A continuing study of the ecological impact of snowmobiling in northern Minnesota. Final Research Report for 1974-75. Bemidji State College, Bemidji, Minnesota; Wanek, W.J. 1971a. Snowmobiling impact on vegetation, temperatures, and soil microbes. In Chubb, M. (ed.). Proceedings of the Snowmachine and Off the Road Vehicle Research Symposium. College of

Agriculture and Natural Resources, Department of Park and Recreation Resources, Tec22h. Rep.8. Michigan State Univ., E. Lansing, MI. 196pp.

[7] Adams, S. E. 1975. Effects of lead and hydrocarbons from snowmachine exhaust on brook trout *(Salvalinus fontinalis)*. Transactions of the American Fisheries Society: 104(2): 363-373; Ferrin, R. S. and G. P. Coltharp. 1974. Lead emissions from snowmachines as a factor in lead contamination of snow. Proceedings of the Utah Academy of Science, Arts and Letters. 51(1): 116-118; Fussell, L., 1997. Exposure of snowmachine riders to carbon monoxide. Park Science 17(1), pp.1, 8-10; Hagemann, M., and M. Van Mouwerik. 1999. Potential water quality concerns related to snowmachine usage. Internal memo. USDI, National Park Service, Water Resources Division; U.S. Environmental Protection Agency. 1999. Federal Register 64(25) 6008-6013.

[8] See also Hagemann, M., and M. Van Mouwerik. 1999. Potential water quality concerns related to snowmachine usage. Internal memo. USDI, National Park Service, Water Resources Division.