

Chapter 5:

Consultation and Coordination

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5.0 CHAPTER 5: CONSULTATION AND COORDINATION

5.1 Scoping and Public Involvement

5.1.1 Scoping Period

The Nabesna ORV Management Plan/EIS scoping period began December 21, 2007, with the publication of the NOI to prepare an EIS in the Federal Register (Vol. 72, No. 245, pages 72754-72755). The NOI invited federal and state agencies, local governments, private organizations, recreational users, and the public to comment on areas of interest or concerns related to the action being proposed. Scoping included newsletters, public meetings held in the affected areas, and meetings with key stakeholders. During the first scoping period, comments were accepted through June 3, 2008, or 60 days after the last public scoping meeting. In spring 2008, a newsletter was mailed to the park's base mailing list and to recreational ORV permit holders (a total of 360 addresses) and posted on the park's website. This first newsletter described the planning process, the issues and objectives, and asked the public for input about trail conditions, use, and management strategies. It contained the dates and locations of the public scoping meetings and information about how to submit comments or obtain more information.

Public scoping meetings were held in Tok, Slana, Glennallen, Fairbanks, and Anchorage from March 26 to April 3, 2008. A total of 91 members of the public were in attendance. The meetings were publicized through local news and event posts and through public service announcements. NPS specialists and planners attended the meetings to answer questions and talk about planning issues. The meetings addressed planning objectives and issues, NPS regulations related to ORV use, maps of the affected area, the planning process, and a range of management options. A scoping report was published in July 2008 (NPS 2008d) and made available for public review. A second newsletter was distributed in fall 2008 to update the public regarding the planning process.

Based on public scoping comments, the NPS developed a set of draft alternatives. In December 2008, an informational package describing these draft alternatives was sent out for public review and comment. The period for commenting on the draft alternatives extended through January 10, 2009, and the NPS received 30 comments. The NPS modified the draft alternatives based on these comments; the resulting five alternatives were evaluated in the draft ORV Management Plan/EIS. The NPS distributed a third newsletter in spring 2009 to update the public regarding the planning process and to inform the public that the scope of the EIS had expanded to include subsistence ORV use on the nine trails. The NPS published a supplemental NOI in the Federal Register (Vol. 74, No. 81, pages 19589-19590) to address this scope expansion. The NOI extended the public scoping period through June 29, 2009, and solicited comments from the public, including local rural residents and residents of the park's 23 resident zone communities who engage in subsistence activities within the park.

5.1.2 Other Public and Agency Consultation and Coordination

Internal correspondence and contact between the NPS and other agencies, subsistence councils/commissions, and members of the public have been ongoing throughout the course of the Nabesna ORV Management Plan/EIS development. Documentation of these interactions is available by request in the administrative record.

The NPS has held and attended many public meetings to discuss the ORV Management Plan/EIS process and solicit input. Several meetings have occurred between the NPS and the National Parks

Conservation Association, one of the plaintiffs in the lawsuit described in Section 1.1.1. The NPS also has met with members of other organizations listed in Section 5.4 (e.g., Alaska Center for the Environment, Wilderness Society).

The NPS recognizes the importance of the involvement of outside experts and stakeholders in the planning process. Therefore, the NPS has held and attended public meetings sponsored by other federal agencies, state agencies, and subsistence councils/commissions to discuss the ORV Management Plan/EIS. Relevant public meetings and other consultations are summarized in chronological order in the following list:

On February 7, 2008, the NPS met with staff from the State of Alaska (ADNR and ADF&G) to inform them about the project, the planning process, preliminary issues, and discuss the best way to coordinate during the planning process. After the meeting, the NPS entered into a cooperative agreement with ADF&G under which they conducted fish habitat assessments at all ORV stream crossings in the analysis area. The ANILCA implementation division of ADNR also reviewed and commented on the draft Plan/EIS prior to public release.

The NPS also consulted with ADF&G biologists at various times regarding the relationships between current trail conditions, potential trail improvements, and access to moose and Dall's sheep harvest opportunities.

The NPS contacted USFWS on March 14, 2008, to initiate an ESA Section 7 informal consultation for this ORV Management Plan/EIS. The USFWS responded on March 28, 2009, in concurrence with the NPS determination that there are no federally listed or proposed species and/or designated critical habitat within the analysis area.

Between September 22 and 24, 2008, the NPS met with several groups in Washington, D.C., including representatives from the State of Alaska; Congressman Don Young's office; Senator Ted Stevens office; Senate Energy Subcommittee on Parks; Senator Lisa Murkowski; Assistant Secretary of the Department of Interior; House Committee on Natural Resources—Subcommittee on National Parks, Forests and Public Lands; as well as the National Parks Conservation Association.

The NPS presented the ORV Management Plan/EIS to the federal subsistence Southcentral Regional Advisory Council on October 9, 2008, at their fall meeting, and to the Citizens Advisory Commission on Federal Areas on November 7, 2008, at their fall meeting.

The NPS briefed the Southcentral Regional Advisory Council again on March 11, 2009, and March 11, 2010, and the federal subsistence Eastern Interior Regional Advisory Council on March 11, 2009.

The Wrangell-St. Elias Subsistence Resource Commission (SRC) was briefed on March 18, 2009.

On September 29, 2009, the NPS presented another update on the Plan/EIS at the fall meeting of the Wrangell-St. Elias Subsistence Resource Commission. They were briefed again on February 17, 2010. As a result of that briefing, the SRC formed a sub-committee to closely review the draft Plan/EIS. The sub-committee met three times with WRST staff with the purpose of reviewing and commenting on the draft Plan/EIS.

The State Historic Preservation Office (SHPO) is on the mailing list for the project and has received all project newsletters. Informal consultation was initiated by WRST staff in order to discuss a strategy for consultation. The NPS formally initiated consultation with SHPO during the review of

the draft Plan/EIS. The strategy is to develop a Programmatic Agreement based on implementation of the preferred alternative.

5.1.3 Tribal Consultation and Coordination

The NPS has conducted government-to-government and other tribal consultation and coordination with various tribal entities throughout the ORV Management Plan/EIS process. Relevant tribal meetings are summarized in chronological order in the following list:

On January 10, 2008, the NPS met with members of Mt. Sanford Tribal Consortium and the Cheesh-na Tribal Council. Cheesh-na is the federally recognized tribal government in the village of Chistochina.

The planning process was discussed on April 29, 2008, and in the spring of 2009 at the semi-annual government-to-government meeting between the NPS and Cheesh-na.

On April 23, 2008, and again in the spring of 2009, the NPS met with members of the Mentasta Village Council and discussed the ORV Management Plan/EIS as part of the semi-annual information exchange prescribed by the Memorandum of Understanding (MOU) between the village and the NPS.

On May 12, 2008, the NPS met with the Ahtna Customary and Traditional Committee to brief the committee on the Nabesna ORV project.

5.2 Major Issues Raised During Scoping

The public involvement efforts described in Section 5.1 led to the identification of a range of issues associated with the Nabesna ORV Management Plan/EIS. These issues are summarized in Section 1.5.

Several studies and technical data were requested during public scoping. Where appropriate, the NPS addressed these suggestions through additional data collection.

A portion of the public comments related to alternative management actions. Comments received after the public scoping regarding the draft alternatives included expressions of support or opposition to various alternatives, suggestions for additional consideration within the range of alternatives, comments regarding resource impacts, and other elements for consideration in the preparation of this Plan/EIS.

5.3 NPS Response to Comments

5.3.1 Introduction

The *Nabesna Off-Road Vehicle Management Plan/Draft Environmental Impact Statement* was released to the public on August 11, 2010. A Notice of Availability was published in the Federal Register on that date (Vol. 75, No. 154, pages 48721-48722). Five public meetings were held across Alaska to review the draft plan and receive public input: September 20, 2010, in Anchorage, Alaska; September 21, 2010, in Copper Center, Alaska; September 21, 2010 in Slana, Alaska; September 22, 2010 in Tok, Alaska; and September 23, 2010 in Fairbanks, Alaska. The public comment period closed on November 10, 2010.

During the public comment period, NPS held numerous briefings at the request of stakeholders in order to facilitate public review and comment. Briefings included the following: Citizen's Advisory Council on Federal Areas on October 21, 2010; Cheesh-na Tribal Council on October 25, 2010; Wrangell-St. Elias Subsistence Resource Commission on October 6, 2010; and Ahtna Customary and Traditional Committee on October 27, 2010. NPS personnel attended and answered questions at two meetings held by the Slana Citizen's group to help them review and understand the draft EIS.

During the 90-day comment period, comments were received via hard mail, e-mail, through the Park's website, and through the NPS Planning, Environment, and Public Comment (PEPC) site. In total 153 comment letters were received via these means. Some comment letters included multiple signatures, and we received 12,587 electronic form letters from National Parks Conservation Association members. The 153 comment letters include organizations that represent tens, hundreds, or thousands of people, including Alaska Outdoor Council, National Parks Conservation Association, Specialty Vehicle Institute, Slana Alaskans Unite, Coalition of Retired NPS Employees, Safari Club International, Copper Country Alliance, Alaska Quiet Rights Coalition, and Residents of the Wrangells. Agencies submitting comments included the State of Alaska and Environmental Protection Agency. Advisory Boards or Commissions included the Wrangell-St. Elias Subsistence Resource Commission, Eastern Interior Resource Advisory Council, and the Citizens Advisory Commission on Federal Areas. Native groups included Ahtna Inc. and Cheesh-na Tribal Council.

5.3.2 Content Analysis Process

A standardized content analysis process was conducted by the planning team to analyze the public comments on the draft EIS. Each letter, e-mail, or PEPC entry that was submitted in response to the comment period is considered a "comment letter," and each of those comment letters was parsed to extract individual "comments" or specific themes or issues that could be grouped according to the categories described later in this document.

Each comment letter was read by at least two members of the planning team to ensure that all substantive comments were identified and coded to the appropriate subject category. Substantive comments are defined by the NPS (2001) as those that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS.
- Question, with reasonable basis, the adequacy of environmental analysis.
- Present reasonable alternatives other than those presented in the EIS.
- Cause changes or revisions in the proposal.

In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Once identified by the planning team members, each substantive comment was sorted based on the impact topics identified in the draft EIS (Soils, Trail Condition, Wetlands, Vegetation, Water Quality and Fish Habitat, Wildlife, Scenic Quality, Cultural Resources, Subsistence, Wilderness, Visitor Opportunities/Access, Socioeconomics, and Natural Soundscapes). In addition, the following categories were identified: Alternatives, Purpose and Need, Management Objectives, Laws and Regulations, Monitoring, and Other.

NPS recognizes several options for responding to comments, including:

- Modifying the alternatives as requested.
- Developing and evaluating suggested alternatives.
- Supplementing, improving, or modifying the analysis.
- Making factual corrections.
- Explaining why the comments do not warrant further agency response, citing source, authorities, or reasons that support the agency's position.

5.3.3 Response to Individual Comments

Table 5-1 contains responses to specific comments, organized by the impact topics identified in the draft EIS. Some general categories were also included beyond the impact topics, to facilitate evaluation of topics brought up in the content analysis. Comment letters were assigned unique numbers (Letter IDs) as they were received. Within each comment letter, individual substantive comments were assigned unique comment numbers (Comment IDs). These numbers are used in this section of the document so that reviewers can easily find their comments and how we responded to them. Table 5-2 is an index of comment letter numbers and the names associated with each. Organizations and government entities are specified, where applicable. Table 5-2 also lists the page numbers where the comments from each comment letter and NPS responses to those comments appear in Table 5-1. For comment letters evaluated and determined not to contain substantive comments, "Non-substantive" is listed in Table 5-2 instead of a page number. Reviewers can use Tables 5-1 and 5-2 to find their individual comments and the NPS responses.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
Soils - Existing Conditions		
N068-2	For instance it would have been nice to know the original condition of the Copper Lake Trail say in 1972, and again in 1982 and then 1992. That period of time saw very nearly drought conditions Basin wide along with extremely hot summers which resulted in the disappearance of the ice lens or as is more commonly called, Permafrost. The disappearance of the permafrost in the entire basin is a major event, and is very applicable to future uses to the Copper Lake trail.	Aerial photography from the time frames you reference in your comment are available and can be used to make generalized conclusions regarding trend in trail condition. However, NPS does not have past trail assessment data that allows us to make specific conclusions about trends in trail condition or soil conditions associated with it. A general discussion of Permafrost and its association with different vegetation types is included on page 3-5 of the Draft EIS. Effects of climate change on permafrost related to ORV trails is discussed briefly on page 4-10 of the Draft EIS.
N068-3	The change in soil composition and level of response would just now be starting to come in to effect yet the discussion in the Draft EIS (Chapter 3, page 3-2) on weather and soils are completely generic.	Section 3.3.1 of the Draft EIS discusses general soil types in the area. For a discussion of anticipated changes in soil composition and other effects to soils please see the Environmental Effects discussion on soils, pp. 4-8 to 4-22.
Trail Conditions - Existing Conditions		
N072-24	Condition classifications are presented in section 3.3.2.2 but definitions are not provided for the classifications which include Good, Fair, Degraded, Very Degraded and Extremely Degraded. We assume you have these definitions and we would request they be included in the final EIS.	As explained on page 3-15 of the Draft EIS, "Condition classification was based on several measured factors, including trail width, rutting, mud/muck index, slope, and soil substrate." The data dictionary for the trail assessment/condition classification as well as an explanation of how trail segments were classified will be included as an Appendix to the Final EIS.
N078-20	We recommend extending the Black Mountain Trail to the Copper River just south of Black Mountain. This relatively new access route does not appear in Figure 3-2; however, subsistence hunters have been accessing this area by ORV for more than ten years. Because it is very difficult to boat that far up the Copper River, subsistence hunters transport rafts on ORVs to this crossing point at the Copper River to further access hunting opportunities on the west side. Allowing this trail extension will also help disperse sheep hunters to relieve pressure and alleviate concerns over increased ORV traffic in the Black Mountain and Tanada Peak areas. If the trail extension is not designated, subsistence hunting opportunities would be severely restricted in both the upper west side of the Copper River, as well as the east side of the Copper Glacier.	This extension will be considered for designation as a trail for subsistence ORV users when baseline trail mapping occurs during implementation and prior to monitoring off-trail impacts (See Draft EIS, page B-4). Whether or not long term designation occurs will depend on: 1) location of the existing trail and its resistance to ORV impacts; and 2) ability to contain the existing trail within one alignment.
Trail Conditions - Environmental Consequences		
N017-21	The document does not seem to include any information regarding the effectiveness of the proposed trail improvements. Will they in fact accomplish their stated purpose?	Effectiveness of the proposed trail improvements is discussed in detail in Chapter 4 (Environmental Consequences) of the Draft EIS. For example, a discussion of the effects of improved trails on wetlands under alternative 4 is discussed on page 4-45 of the Draft EIS, accompanied by a table displaying "Wetland Acres Impacted" as well as "Acres Allowed to Recover". This type of discussion is included for each impact topic in Chapter 4 of the Draft EIS.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N066-1	These ORV routes become impassable to anything that travels on foot--humans included	Degraded to severely degraded portions of trails can making hiking difficult, but not "impassable". This is acknowledged in the Draft EIS under a description of the existing condition of each trail (pp. 3-10 - 3-15, Draft EIS)
N069-5	We believe that the assumption that improving the trails will eliminate the impacts is flawed, particularly in view of widely-demonstrated behaviors by those operating ORVs, which often include driving outside the designated trails to get around obstacles, resulting in impacts outside the established trail corridor.	Under the Alternatives where trail improvement is proposed (Alternatives 4 and 5), recreational ORV use would not be permitted on trails in fair or worse condition until trail improvements occur. This would eliminate the need for recreational ORV users to drive around "obstacles". Conditions of the recreational ORV permit are listed on page 2-7 of the Draft EIS and include staying on designated trails. These are the conditions upon which the analysis was based.
N072-16	This trail (Tanada) goes through a very wet and fragile environment and until the trail is improved we are concerned that continued ORV use of this trail will result in further expansion of the already extensive resource damage and/or require a system of temporary closures.	Under Alternatives 3, 4, and 5, if monitoring for unimproved trails indicates (based on the standards described) that resource impacts associated with degraded trails are expanding, NPS will consider a range of management actions, as described in Table 2-3, page 2-21 of the Draft EIS.
N085-14	Percentages given in Table 3-5 are wrong. Instead of 49.8% recreational and 50.2% subsistence, your numbers actually come to 47.7% recreational and 52.3% subsistence. 2) Relying on "round trips" is misleading when evaluating use because of the different lengths of the trails and the different percentages of user groups on the trails. Since the recreational ORV users can't drive on the Black Mountain and Trails south of Tanada Lake. and since the other two longest trails - Tanada Lake and Copper Lake - have a preponderance of subsistence users. the actual ORV use in "trail miles" works out to 33% recreational and 67% subsistence.	The information presented in the "Percent of Total Round Trips" column of Table 3-5 (page 3-21, Draft EIS) is most useful for displaying information regarding individual trail use. The information presented in the "Total" row under the "Percent of Total Round Trips" for both Recreational and Subsistence ORV use will be deleted in the Final EIS.
N085-15	The discussion in 3.3.2.3 indicates that 74% of permits are given to recreational users and 26% are given to subsistence users. It also says that the NPS estimates that only 25% of subsistence users get permits. The math actually then means that 58% of ORV users are subsistence users and 42% are recreational. This would add another 6% to the subsistence use in points 1 and 2 above, which would mean that 73% of the ORV use on trails in the analysis area is from subsistence users, and only 27% from recreationalists, not "fairly evenly split."	The narrative in the first paragraph of page 3-20 of the Draft EIS is intended as a general characterization of ORV users on the trails, based on permit data. As stated by the commenter, "NPS estimates that only 25% of subsistence users get permits." This estimate should not be extrapolated to attempt to calculate specific levels of subsistence and recreational ORV use. The NPS stands by the data presented in Table 3-5, which is based on "ORV permittee phone surveys, harvest data, and trail counter data." (Draft EIS, page 3-20).
N085-16	None of this analysis takes into account the subsistence use on "94 miles of other motorized trails in the area" (p.3-10), where recreational ORV use would not be permitted. Most of the 94 miles experience "...less than 20 passes per year...by local subsistence users.. 'If you add this trail use - say 10 passes per mile off trail -to the totals from Table 3-5 and the points above, subsistence use climbs another 3% to 76% of the total use on trails in the analysis area, over 3/4ths of the total use.	The narrative on page 3-20 and the data presented in Table 3-5 of the Draft EIS are not intended to provide an estimate of the subsistence ORV use in the entire analysis area; but rather a general characterization of ORV users on the trails, based on permit data, and specific trail use for the trails presented in Table 3-5. These trails, as stated on pp. 1-1 and 3-10 of the Draft EIS, are the focus of the analysis. The EIS states that "estimating actual use from the number of subsistence permits, which are not required, underestimates subsistence use" (Draft EIS, page 3-20).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N085-21	This trail condition is impaired now and will continue to be so bad in the future that recreational use (1/4 of all use) cannot be permitted on it under any reasonable alternative.	The Draft EIS acknowledges the existing degraded condition of trails in the area (Table 3-2, page 3-19, Draft EIS). In three of the five alternatives (including the NPS preferred alternative 5), recreational ORV use is not permitted on trails in worse than fair condition until trails are improved.
N085-22	Where is the "effectively surrounded" determination that permits ORV travel across park land on a very degraded trail to an "inholding"?	Page 2-7 of the Draft EIS (Under "ORVs for Accessing Private Inholdings") describes management of the use of ORVs for accessing private inholdings within the analysis area, common to all alternatives. A correction will be made to this section to note that the Suslota trail does not access private inholdings within the park.
N116-1	The environmental impacts of trail use are much overstated in the document	The methodology used to analyze and describe impacts is described for each impact topic in Chapter 4 of the Draft EIS. Wherever possible, impacts are quantified based on trail-specific measurements and/or described based on research cited in the Draft EIS.
Wetlands - Environmental Consequences		
N085-2	This sentence should be corrected to read: "Aside from the Nabesna Road and associated private land development, ORV trails are use is the only source of non-natural wetland disturbance within the analysis area...The majority of beneficial wetland stabilization and natural revegetation would occur from the abandonment of ORV trails use that cross(es) extensive wetlands by constructing upland trail reroutes." (Section 4.3.1.3)	The sentences as written imply that ORV use goes along with ORV trails. The Final EIS will be modified to clarify this sentence.
N085-3	Impacts from off-trail ORV use on wetlands is thoroughly discussed in Chapter 3. But the analysis in Chapter 4 fails to account for those impacts off the 9 trails. a) -Most of the wetlands found within the analysis area are high quality wetlands	The Chapter 3 discussion (on page 3-10 of the Draft EIS) of the 94 miles of other motorized "trails" in the area and Figure 3-3 provide our best representation of detectable off-trail use. While there may be other off-trail use occurring, it is not detectable on satellite imagery and consequently resulting in negligible impacts to soils, wetlands, or vegetation. This will be clarified in the Final EIS in the discussion on page 3-10. Discussion of impacts from ORV use off the nine trails is included in the cumulative impacts section for most impact topics. For example, contribution of off-trail ORV use to cumulative effects on wetlands are discussed on page 4-38 of the EIS, with a similar discussion for most impact topics. (Same response for N085-3, N085-4, and N085-7)
N085-4	This "single pass" background from WRST research is not used in this chapter to evaluate impacts to wetlands from off-trail use. For any alternative, no off-trail use is estimated in any kind of numerical terms, such as miles driven, acreage of evidence of use, acreage of damage. By the terms of Section 811, the ORV use is limited to "appropriate" use, governed by "reasonable regulations," which regulations do not permit damage to wetlands.	
N085-7	Reading the evaluations in Chapter 4 makes it seem that these off-trail ORV trips have no measureable impacts, including in wetlands. Even the 94 miles of trail located in 1986 were not inspected for this document:	
N085-5	The same observations about the susceptibility to wetland damage from use on 9 trails apply to the areas surrounding these 9 trails. These 9 trail locations were not developed to take advantage of the worst ground for ORV use; those areas of the worst ground are off-trail, and are still open for ORV use.	Table 4-9 (page 4-33 Draft EIS) displays estimated impacts to wetlands from ORV use. These estimates include wetland impacts surrounding the 9 trails resulting from trail braiding and "migration" of the trail over time. Other off-trail impacts are not discussed or analyzed because they have not been documented in past trail inventories or assessments in the park and/or they are not visible on satellite imagery or aerial photography.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

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N085-6	So the ORV use "changes" the wetlands and this is OK because they can still retain some wetland functions. Habitat is a wetland function, and permanently altering it does not maintain or protect that function. A purpose of WRST is tomaintain unimpaired.. landscapes in their natural state; to protect habitat.. ... (Section 201 a of ANILCA) A fundamental resource of WRST is "The park protects continuous intact ecological communities...largely unaffected by humans." (p.1-9)	Impacts to wetlands are described as "moderate" under Alternatives 1 and 3 and "major" for alternative 2, based on the analysis of actions proposed in these alternatives and based on the impact criteria for wetlands described on 4-31 of the Draft EIS. Based on the 2010 "Interim Guidance for Impairment Determinations in NEPA Documents" the Final EIS includes Appendix A, which describes an impairment determination for each impact topic for Alternative 6 (the preferred alternative). Consistent with the Interim Guidance, the Final EIS does not include impairment determinations for the other alternatives.
Vegetation - Environmental Consequences		
N085-12	The same lack of impact evaluation for ORV use off-trail is true for vegetation	The Chapter 3 discussion (on page 3-10 of the Draft EIS) of the 94 miles of other motorized "trails" in the area and Figure 3-3 provide our best representation of detectable off-trail use. While there may be other off-trail use occurring, it is not detectable on satellite imagery and consequently resulting in negligible impacts to soils, wetlands, or vegetation. This will be clarified in the Final EIS in the discussion on page 3-10. Discussion of impacts from ORV use off the nine trails is included in the cumulative impacts section for most impact topics. For example, contribution of off-trail ORV use to cumulative effects on wetlands are discussed on page 4-38 of the EIS, with a similar discussion for most impact topics.
Water Quality and Fish Habitat - Environmental Consequences		
N153-2	On the Copper Lake Trail I do not support the finding of Moderate concern for Fisheries Resources. I believe this should be reduced to Low or Minimal. A fish weir has been operated approximately ~ mile up from the mouth of Tanada Creek for about 10 years. Sockeye salmon are known to migrate through and spawn in Tanada Lake and near its outlet. Chinook salmon have also been documented passing the weir. Annual counts are typically less than 20 fish. It is not known if this is a viable population or a mix of opportunistic strays from other spawning populations. We have no knowledge of a specific spawning area for these fish. With roughly 20 plus miles from the weir to the lake, the chance of the Copper Lake Trail crossing site to coincide with the specific spawning site of any of the Chinook salmon is extremely low. If there were redds located specifically at the crossing point, then there would be concern from direct substrate disturbance. There are no reports of Chinook spawning in this area Downstream siltation from tire disturbance should also not be considered a factor, as Tanada Creek routinely incurs much higher, sustained levels of siltation caused by flood scouring of silt banks and surface run off.	Page 4-72 of the Draft EIS states "Of the 59 representative trail-stream crossings in the analysis area assessed by Buncic et al. (2009), one crossing, TC-1, where the Copper Lake trail crosses Tanada Creek, has habitat suitable for Chinook salmon spawning. If spawning nests were present, bottom disturbance by ORV crossing could cause direct fish egg mortality in this location...a localized, moderate, adverse impact." A determination of moderate impact for alternatives 1, 2, and 3 was reached because these alternatives leave the crossing unimproved, thus mortality of individuals or disturbance of spawning gravels might occur. This is consistent with a moderate level of impact, as described in the Impact Threshold Criteria for Fish Habitat on page 4-71 of the Draft EIS.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

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Wildlife - Existing Conditions		
N081-6	The paucity of information is reflected in the DEIS, which gives a full page to moose and less than a third of a page to all furbearers and small game combined	The amount of information presented in Chapter 3 and analyzed in Chapter 4 is issue driven. In this case, the management of ORV use (which does not include snowmachines) is more likely to have impacts on the species discussed in detail (such as moose and Dall's sheep) than on furbearers.
Wildlife - Environmental Consequences		
N015-6	If trails in Nabesna are repaired or constructed as hard compacted trails that are easily accessible for hiking and ORV use, the public will make use of these trails. This will have an adverse impact upon wildlife. Moose and sheep are not habituated to humans, and will move away from these frequently used areas.	The Draft EIS predicts a 93 percent increase in ORV use (over current levels) for alternative 4 and 83 percent increase in ORV use (over current levels) for Alternative 5 (pp. 4-92 and 4-95 respectively). Effects of the increased level of ORV use and associated hunting pressure on Dall sheep and moose are described on pp. 4-92, 4-93, 4-95, and 4-96. The Draft EIS concludes that the impacts to wildlife under Alternatives 4 and 5, where trail improvement occurs, would be moderate.
N073-24	We also disagree that hunters will be displacing animals. Under current conditions the animals are a long way away from the trails.	The determination that animals could be displaced under some alternatives was based on the projected level of ORV use (see response to N015-6) and anticipated increases in hunting pressure associated with that use. Hunting pressure extends beyond trail corridors.
N075-25	We believe that increased use by all users will result in more pressure on wildlife pushing them further back from the trails and may result in more competition for other resources such as berries and fish	We agree. Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program. In Appendix F (ANILCA Section 810(a) Summary Evaluation and Findings) the NPS concludes for Alternatives 4 and 5 that "improved access may attract additional general (sport) hunters to the trails in the Nabesna District, with the potential to increase competition for the area's wildlife resources...however; it is not anticipated to significantly restrict subsistence activities" (page F-7, Draft EIS).
N075-26	While we agree that Alternative 4 will improve subsistence access to resources, we believe that trail improvements under that alternative and Alternative 5 will result in an increase in competition for resources and greater pressure on wildlife when fully implemented.	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N078-14	We expect that hunting pressure north of Nabesna Road will not increase significantly, if at all, with trail improvements. These short trails go straight to hunting areas in the mountain foothills and hunter numbers have naturally leveled in this area. Local users have utilized the area south of Nabesna Road for generations and the number of hunters has not significantly changed for over 20 years. These trails, for the most part, also have reachable destinations in the mountain foothills—trail improvement likely will not change this. There is little to suggest the improved trails will cause the number of hunters to significantly increase beyond normal fluctuations (see attachment).	We agree for some of the trails. Table 4-1 (page 4-3, Draft EIS) predicts only slight increase in ORV use between Alternatives 1 (no trail improvement) and Alternatives 4 and 5 (trail improvement) for the Reeve Field, Trail Creek, and Lost Creek trails. The increases predicted for the Soda Lake and Caribou Creek trails can be attributed to a projected increase in recreational use, since these trails access recreational opportunities (public use cabin on Caribou Creek and Soda Lake on the Soda Lake trail).
N078-26	We question the assertion that Alternative 5 will have a “ <i>moderate</i> ” effect on wildlife, especially considering the DEIS determined the no action alternative, with no improvements, would have a “ <i>minor</i> ” effect. For example, ORV trails have the general effect of creating exposed organic and mineral soil areas—prime substrate for sedge and grass growth. The DEIS effects analysis neglects to mention this new vegetation, available during the summer months, is seasonally beneficial to brown and black bears, moose, and caribou. While the ORV traffic can damage lichens, affecting winter caribou range, caribou prefer the resultant quick growing sedge and grass growth during the summer months. Additionally, wildlife—particularly moose and caribou—frequently utilize certain ORV trails for travel as it provides a route through brush.	The moderate effect on wildlife predicted for Alternative 5 is based on increased disturbance impacts from ORVs and increased hunting pressure, particularly off the improved Copper Lake and Tanada trails (page 4-96, Draft EIS). The determination of moderate effect is not based on effects to wildlife habitat, which are predicted to be positive under alternative 5 (page 4-96, fourth paragraph, Draft EIS).
N078-27	The citation found on page 4-85 (ADF&G (1996)) pertaining to ORV displacement of moose, is not reflective of the pressure found in the Nabesna area. The referenced report pertains to state lands where there are few, if any, designated trails; ongoing trail use tends to incrementally increase the number and length of discernible trails over time; and more categories of hunters have access. In the Nabesna area, hunting pressure is already restricted in the park by federal subsistence regulations and in the preserve by existing and proposed trail restrictions	The citation and preceding sentence will be deleted from the text in the Final EIS.
N081-7	We are not suggesting an end to hunting and trapping of small game, furbearers, and non-game species. We are pointing out that, without much knowledge of how many of these animals there are and how many are taken by hunters and trappers, an upsurge in harvest for some reason (fur prices increases or a new market, for instance) could result in a population being severely impacted before the NPS noticed it. Therefore, it would be wise to limit the take by prohibiting recreational ORV use in the Park and Preserve	Snowmachines are not considered as an ORV in the Draft EIS and their use is not analyzed in detail, for reasons explained on page 1-15 of the Draft EIS. Since snowmachines are the primary means of access for trapping, the prohibition of recreational ORV use in the park and preserve would have no effect on current trapping activity that occurs in the analysis area.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N081-8	Under Alternative 5, with recreational ORV use allowed, overall impacts to wildlife are expected to be “long-term, adverse, and moderate” (4-95). Considering that one of ANILCA’s three stated purposes for Wrangell–St. Elias Park and Preserve is “to protect habitat for, and populations of, fish and wildlife,” prohibiting recreational ORV use is simply following ANILCA’s intentions. Recreational ORV use can be eliminated without reducing opportunities for subsistence harvest of fish and wildlife by local residents	The long term, adverse, and moderate impacts to wildlife predicted for Alternative 5 are attributed to "the substantial increase in projected ORV use and increased access to game species", not impacts to wildlife habitat (page 4-98, Draft EIS). Habitat conditions are expected to improve with "improved condition of trails, maintenance of the single trail alignment, and continued monitoring and maintenance activities to ensure that impacts associated with unimproved trails do not expand" (page 4-98, Draft EIS). It is concluded that the predicted moderate impacts "would not affect the viability of any of these wildlife populations" (page 4-98, Draft EIS). We agree with the concluding sentence of your comment.
N081-9	For all alternatives, an important cumulative impact is missing from the discussion of effects on wildlife (and also on other values). That impact comes from snowmachines, which may be used in both Park and Preserve, both on and off designated summer ORV trails, for both subsistence and recreation. Within the next twenty years, off-road visits by snowmachines could increase substantially. This would be especially true with if the expected frontcountry development includes year-round lodges. Snowmachines impact wildlife in a number of ways: destroying ptarmigan and small mammal winter shelter by compressing snow; changing the predator–prey balance by creating well-packed trails that wildlife travel on; displacing wildlife; and increasing wildlife harvests. It is surprising and incomprehensible that this source of cumulative impacts—which as the potential to be moderate to major over the next twenty years—has not been mentioned, while others, expected to be minor, were discussed	The Final EIS will consider snowmachine use in the analysis area in the cumulative analysis for wildlife.
N145-1	The analysis in the EIS of impacts on wildlife focuses almost exclusively on hunting and on species that are hunted in the national preserve. Little is said about wildlife-watching and species that are not hunted. Inasmuch as many visitors go to the Nabesna District to watch its birds and mammals, we urge that this gap be remedied in the final EIS.	Wildlife viewing is acknowledged as an activity under the Visitor Opportunities/Access impact topic on page 3-86 of the Draft EIS. Impacts resulting from ORV use on those engaged in non-motorized activities are described on pp. 4-158 to 4-169 of the Draft EIS.
N153-3	I believe the potential increase in use of this trail once a bridge is installed [across Tanada Creek] could lead to a substantial increase of wildlife harvest.	Your concerns are reflected in the conclusion that Alternatives 4 and 5 would result in a moderate impact to wildlife because of "the substantial increase in projected ORV use and increased access to game species" (pp. 4-95 and 4-98 for Alternative 4 and 5 respectively, Draft EIS). We agree that there would be increased ORV use on an improved trail and increased hunting pressure. (Same response for N-153-3, N153-4, and N153-5).
N153-4	trail. I also believe this will result in increases in subsistence hunting pressure on wildlife; especially on remote sheep populations.	
N153-5	For years, the occasional impassability of Tanada Creek combined with difficulties of mud hole travel have combined as an effective means of passive management for these remote sheep populations.	
Scenic Quality - Existing Conditions		
N097-8	Human impact (ie. trails) are part of the aesthetics of the Park and must be recognized as such	Section 1.7 of the Draft EIS (starting on page 1-16) sets out the applicable Federal Laws, Regulations, and Policies. There is no requirement that NPS address human impact as part of the aesthetics of the park.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
Scenic Quality - Environmental Consequences		
N007-3	Perhaps nowhere in the document are your conclusions more flawed than on the issue of impairment. According to your analysis none of the alternatives constitutes impairment because each of the only has "minor impacts to scenic quality".	A conclusion of minor impact to scenic quality for each alternative is based on the scale of the impact to scenic quality as well as how visible the impacts are to most viewers. This is explained in the conclusion section for each alternative in the Scenic Quality section of Chapter 4 of the Draft EIS (pp. 4-98 to 4-114). (Same response for N007-3 and N076-6)
N076-6	Given the visual similarities of game trails and properly maintained ORV trails, impairment of Park and Preserve resources due to the existence of the ORV trails is not a tenable argument.	
N081-10	We hope that the Service will encourage a more intimate experience of the Park and Preserve than what can be obtained from the road, and recognize the magnitude of the impact of degraded motorized trails on those who do leave the road. The impact of the degraded trails on scenic beauty should not be minimized because a minority of WRST's visitors experiences them	The Draft EIS acknowledges, for unimproved trails, that degraded trails impact scenic quality for trail users as well as those driving the road. See, for example, the first full paragraph of page 4-102 of the Draft EIS.
Cultural Resources - Existing Conditions		
N015-1	The Ahtna Tene Nene' Customary & Traditional Use Committee would like to start of by pointing out that documentation Traditional Ecological Knowledge of the Nabesna trails should have been obtained prior to the draft of this Nabesna EIS. These trails have historic use by the Ahtna People. Funds should be set aside to conduct such research by WRST management along with Cheesh-na Tribal Council, Mentasta Village Councils and Ahtna Heritage Foundation.	Historic trail use by the Ahtna People is described for each of the trails in section 3.5.2.3, Documented Cultural Resources along ORV Trails in the Analysis Area. The information presented here was obtained in most cases by interviews with Ahtna people. For example, "in the early 1980s linguist James Kari interviewed Fred John, an Upper Ahtna, who talked about using this trail to travel north to Tetlin (Haynes and Simeon 2007)" (page 3-65, Draft EIS). WRST intends to pursue the documentation of the Traditional Ecological Knowledge (TEK) related to these trails as part of an Ethnographic Cultural Landscape Inventory which will be included as a component of the Section 106 process in accordance with the National Historic Preservation Act. This work would incorporate previous ethnographic documentation but would expand on that effort to focus on the trail network in the Nabesna District as a Traditional Cultural Property. This would be a collaborative effort with the village councils and the Ahtna Heritage Foundation.
N068-5	Another impact related topic that is never mentioned is trail management by indigenous users. Not speaking to prior users detract in our estimation from the overall alternatives by making this document an ORV document only as opposed to a Trails Document.	Trail management by indigenous users is described in the third paragraph, page 3-63, of the Draft EIS. The information cited here is a direct reflection of interviews with Ahtna people.
N068-6	WE (Cheesh'na) are descendants of a Trail using society where trails had meaning, purpose and served as a resource to family and users.	This is acknowledged in the Draft EIS on page 3-63 and under the trail by trail descriptions in section 3.5.2.3.
N068-7	Cheesh'na Tribal Council views these trails as a resource and it matters to us that any discussion of these trails should include meaning, values, and remembrances...These discussions should have had a chapter all its own but is not even mentions in some several hundred pages of text.	Please see responses to comments N015-1, N068-5, and N068-6. Additionally, the Cultural Landscape Inventory would result in a stand alone document that will highlight the importance of the trail network to the native community, including meanings, values, and remembrances. As such, it will be more relevant and more useful in future planning efforts.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-1	The lands within Wrangell - St. Elias National park and Preserve accessed via the trails that are the subject of this EIS are critical to the pursuit of traditional subsistence activities and to the preservation of our values and lifestyle choices. In some cases, these trails have been in use for thousands of years by the Ahtna Headwaters people. These trails are more than just a mean to access the park and preserve. They are the mean by which we teach our youngsters to appreciate nature, to be self sufficient and to connect with something bigger than ourselves. We have a relationship with the trails that inspires in us a desire to sustain them and be stewards of this special place. This is not a wilderness to us - it is part of our homes and we are part of this great landscape.	Thank you for your comment. The NPS acknowledges the importance of trails to the pursuit of traditional subsistence activities (see sections 3.5.2.2 and 3.5.2.3 of the Draft EIS). Please see response to comment N015-1.
N078-40	Page 3-64, Section 3.5.2.3: The Northern Land Use Research (NLUR) studies provided information on cultural resources along ORV trails in the analysis area. Several trails were identified as RS 2477 ROWs. After identifying these historic ROWs, an NLUR survey is cited as stating " <i>NLUR personnel did not observe any signs of the RS2477 historic trail.</i> " It is not clear what would be constructed as a "sign" of an RS 2477 ROW; however, we object to including the above reference on the basis that readers may interpret them as relating to the validity of the RS 2477 ROW. To avoid such misconceptions, we recommend deleting "RS2477" from the quoted sentence wherever it appears in the trail subsection	Thanks for the comment. Your suggested change will be made in the Final EIS.
Cultural Resources - Environmental Consequences		
N068-4	There is no information here relevant to the impact of Climate Change vis a vis the ability to continue to utilize these trail for use that are directly a part of family nutrition, educational, health or cultural makeup needs.	The cumulative effects of climate change are discussed as follows: soils, page 4-10; wetlands, page 4-39; vegetation, page 4-58; fish habitat/water quality, page 4-76; and wildlife, page 4-87. The combined effect of climate change and other factors (ORV use, trail improvement) is then expressed in the Conclusion section for those impact topics.
Subsistence - Existing Conditions		
N048-2	How can this current crop of high powered, noisy, smelly, gas guzzling, go anywhere, mudslinging, terrain terrors, animal harrassing four wheelers be considered traditional means of access when they didn't even exist prior to the formation of the park?	The determination that ORVs were a traditional means of access for subsistence activities was made in the Wrangell St. Elias National Park and Preserve 1986 General Management Plan (Draft EIS, section 1.7.3.7, page 1-23). The 1986 General Management Plan defined ORVs as "any motor vehicle, including all-terrain vehicles, designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, wetland, or other natural terrain, except snowmachines or snowmobiles." This definition will be added to the Glossary of the Final EIS.
N068-1	We question for instance the lack of local knowledge, input and/or contact for reference purpose. There is no narrative of any one long time subsistence user or family members who has ties to the trails.	Please see response to comment #N015-1 under Cultural Resources. Additionally, the NPS interviewed Wilson Justin as a long time subsistence user who has knowledge of the trails and he is cited in Chapter 3 of the Draft EIS.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-11	Reliance on data from permits issued by the NPS is problematic because operators who obtain Recreation Special Use Permits are not restricted to any one trail and because subsistence users are not required to obtain permits at all. further it is possible that operator might obtain permits and not make use of them.	The NPS agrees. The problems associated with permitted ORV use are described on page 3-20 of the Draft EIS. That is why "numbers were estimated based on trail counter data, permit data, telephone interviews with permittees, and harvest data" (Draft EIS, page 4-2). (Same response for N075-11 and N078-19)
N078-19	We also suggest noting the possibility that while a permit holder may have a permit, they may not actually make the trip to the Nabesna area. For example, when the trails were closed this past summer, a week before hunting season, many individuals with permits may not have made the trip	
N075-12	Hunting data is also problematic. The Nabesna area includes part of two game management areas; Unit 11 and Unit 12. Unit 11 covers most of the interior portion of the park including the area accessed by McCarthy Road. Harvest data would have to be analyzed after sorting hunt reports by harvest location. In recent years there has been a Federal Subsistence Permit requirement for Unit 11 but before that analysis would have to include state hunt reports. Unit 12 includes a small portion of WRST NP and Preserve including the last 15 miles of the Nabesna Road. The majority of the unit is located north of the park in the Tok and Tetlin Wildlife Refuge areas. As with Unit 11 hunt reports would have to be sorted by harvest location. There is no indication in the analysis that this has been done.	We agree with the first portion of your comment. Harvest data is not reliable as a sole source of information to display current ORV use. Hunters harvesting an animal report their mode of transportation and general area where harvest occurred. Sometimes this can be used, when overlayed with trail locations, to determine that a specific trail was used to access the harvest area. But sometimes the harvest location information is too general. Please see the response to comment N075-11.
N078-17	We request the DEIS (Page 3-20, Section 3.3.2.3) indicate when subsistence ORV trail permits were first made available and add the most recent 5 years of ORV permit data to Table 3-4	This information has been added to the Final EIS.
N078-41	Page 3-68, 3.5.3, Subsistence: The State of Alaska also provides subsistence opportunities within the preserve; therefore, we recommend starting the first sentence of this section with <i>"Federally qualified subsistence use is allowed ..."</i>	The recommended change will be made in the Final EIS.
Subsistence - Environmental Consequences		
N007-4	It acknowledges, albeit insufficiently, the negative impacts of Alternative 5 on subsistence as well. All three of these [scenic quality, wildlife, and subsistence] are resources/values that are essential to the integrity WRST as established by ANILCA. You do a disservice to the concept of impairment as articulated in Management Policies and to the careful and long labors that went into the passage of ANILCA by limiting the stated purposes for Wrangell-St. Elias National Park & Preserve as well as its integrity as a unit of the National Park System to "scenic quality".	The Draft EIS does not identify scenic quality as the only purpose for Wrangell-St. Elias National Park and Preserve. Please see section 1.3 (Park Purpose and Significance) which lists various purposes and significance statements. Based on the 2010 "Interim Guidance for Impairment Determinations in NPS NEPA Documents" the Final EIS includes Appendix A, which includes an impairment determination for each impact topic for Alternative 6 (the preferred alternative). Consistent with the Interim Guidance, the Final EIS does not include impairment determinations for the other alternatives.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N073-10	Trail improvements may or may not result in increased trail use, displacement of wildlife, and more hunters, resulting in increased competition with subsistence users. These impacts need to be taken into consideration in any planned improvements.	The effects of trail improvements on wildlife and on subsistence resources are described in Chapter 4 of the Draft EIS. Please see pp. 4-95 (Alternative 4 effects on wildlife); 4-98 (Alternative 5 effects on wildlife); 4-133 (Alternative 4 effects on access and competition for subsistence resources); and 4-135 (Alternative 5 effects on access and competition for subsistence resources).
N148-12	We also take issue with some of your estimates of future ORV use for subsistence users. In light of the fact that Slana residents report a decrease in the area's population, and the WRST SRC reports no significant growth in the area's population, the subsistence estimates seem too high, and therefore slant the estimates of future resource impacts. Also, other factors such as the cost of gasoline, the amount of game in the area, weather, fires, and the length and timing of the hunting season can affect the numbers of both subsistence and recreational users and don't seem to be addressed.	Please see response to comment #N073-21. ORV use estimates for improved trails north of the Nabesna road (Caribou Creek, Trail Creek, Lost Creek, Soda Lake, and Reeve Field) predict little to no increase in subsistence ORV use. For the improved Tanada Lake and Copper Lake trails, Alternative 5 predicts a 36% increase in subsistence ORV use for the Copper Lake trail and slight increase in subsistence ORV use for the Tanada Lake trail. For alternative 5, the reason for the lower levels of predicted increase was based on anticipated competition with recreational ORVs (sport hunters). Under Alternative 4, no recreational ORV use would be permitted, so projected subsistence ORV use was estimated at a higher level for these two trails (125% increase for Copper Lake trail and 250% increase for Tanada Lake trail). Several other comments were received regarding the high predicted numbers for these two trails for Alternative 4. The Final EIS will adjust the predicted subsistence ORV use levels downward for the Tanada and Copper Lake trails under Alternative 4. (Same response for N148-12 and N073-21).
N073-21	Estimates about growth in trail use: We believe that the estimates of future subsistence use of trails (Table 4.1) are too high. Future subsistence use levels will be based on game availability, not on improved trails. Game densities will not support that level of subsistence users. In addition, there has been no significant growth in the area population. So subsistence use is unlikely to increase.	
N073-22	Link between trail use and wildlife populations and harvest opportunities: Nowhere in this draft EIS are trail users connected with game populations and hunting regulations. Trail use is nearly all driven by wildlife populations and the ability to hunt. Trail condition has a much more limited impact than those two factors.	The Draft EIS acknowledges in several places that trail use is driven by hunting. Page 3-20 characterizes recreational ORV use and states "a major component of recreational ORV use includes the use of ORVs to support sport hunting" (Draft EIS, page 3-20). Current recreational and subsistence ORV use levels were estimated, in part, through harvest data (Draft EIS, page 3-20). And the assumptions for the projected ORV use levels displayed in Table 4-1 acknowledge the link between trail use and hunting (see paragraphs 6 and 7, page 4-2 of the Draft EIS).
N073-25	Finally, we disagree with conclusion that Alternatives 4 and 5 will have a moderate negative impact on the numbers and distribution of significant subsistence wildlife resources. This is based on the above two comments. We believe that there will be a minor negative impact.	NPS maintains that the ORV use predicted for recreational and subsistence use on improved trails under Alternative 5 is reasonable, given the number of recreational ORV users (including hunters) who would be attracted to an improved trail (Tanada Lake) that offers a recreational destination as well as sport hunting opportunities (sheep hunting in the wilderness preserve). This level of predicted ORV use justifies the moderate impact on wildlife described on page 4-98 of the Draft EIS, based on the Impact Threshold Criteria shown on pp. 4-83 and 4-84 of the Draft EIS. However, the Final EIS will re-analyze the effects to wildlife predicted for Alternative 4, based on the adjusted numbers described in the response to comment #N073-21.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-10	We believe that reliance on this data (Table 4.1) unnecessarily skew the projected environmental consequences of both Alts 4 and 5. The data is particularly troublesome with regard to the projected impacts to designated Wilderness in Alternative 4 caused by unrestricted subsistence ORV use and by an increase in use created by the improvement of trails leading to designated Wilderness	The NPS will re-analyze environmental effects associated with the Tanada Lake and Copper Lake trails, based on adjusted subsistence ORV use for those trails under Alternative 4. Please see the response to comment #N073-21.
N075-18	We believe that the projected increase in subsistence use is far too high and skews the projected environmental concerns against subsistence access. We request that the projected use numbers be modified to reflect our concerns and that the ORV EIS include specific strategies the NPS will use to mitigate pro actively impacts to designated Wilderness and other areas caused by increased access by ORVs	Please see response to comment N075-10. And, the Final ORV EIS will include specific strategies to mitigate impacts to designated Wilderness and other areas caused by increased access by ORVs (designation of improved trails in the Wilderness for subsistence ORV users and off-trail monitoring outside of the Wilderness).
N078-16	The DEIS indicates subsistence users are expected to increase by two or three percent a year on the basis of past trends of permit issuance; however, the number of permits issued is not reflected in any of the subsistence harvest data nor does the DEIS include actual data. Permits are not required for subsistence users, so increases in permit numbers more likely reflect existing users getting permits for the first time	The NPS agrees. The assumptions associated with permitted ORV use are described on page 3-20 of the Draft EIS. That is why "numbers were estimated based on trail counter data, permit data, telephone interviews with permittees, and harvest data" (Draft EIS, page 4-2).
N078-18	It seems reasonable to expect the percentage of subsistence users obtaining ORV permits has increased over the years due to education. As such, estimating 25 percent of subsistence users obtain permits is likely understated. The highest number of federal subsistence moose hunters (FM714) is 54 in 2007 (hunters using the Nabesna area, reporting ORV use); therefore, it seems that a substantially higher percentage of subsistence users are obtaining ORV permits	It is acknowledged in the Draft EIS that 25 percent is an estimate (page 3-20, Draft EIS). This percentage was not used to estimate current or projected ORV use on trails.
N085-13	The analysis underrepresents subsistence ORV use. There is also little to no acknowledgement of inholder ORV use, which is unevaluated and unregulated.	The analysis represents the best available data, which is based on multiple data sources, including "permit records, ORV permittee phone surveys, harvest data, and trail counter data" (Draft EIS, page 3-20).
N153-7	Subsistence can fulfill both physical and spiritual needs. The experience of some extent of an arduous expedition as one travels deeper into the land and wilderness is spiritually fulfilling. Extensive trail hardening, installing bridges, gravel, etc. will very negatively impact this aspect of the existing subsistence opportunity.	Thanks for the comment. Improved trails would provide access to subsistence resources and ample opportunities for non-motorized arduous expeditions.
Subsistence - Cumulative Impacts		
N153-6	Extensive hardening may lead to the need for more extensive, and direct management of recreational and subsistence harvests.	For Alternatives 4 and 5 (where trail hardening is proposed), the Draft EIS states "Should an unsustainable increase in harvest levels occur, the Federal Subsistence Board and the Alaska Board of Game could modify seasons, harvest limits (e.g., horn or antler restrictions), or both" (Draft EIS, page F-5).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
Subsistence - 810 Appendix		
N073-23	Regarding the analysis of the potential of Alternatives 4 and 5 to reduce important wildlife populations, we disagree with the statement that there will be a significant increase in ORV use and hunting pressure. We recommend deleting the word "significant" from this statement. Trails use is nearly all driven by wildlife populations and the ability to hunt, not by trail conditions.	The word "significantly" will be deleted from the second sentence of the fourth paragraph under the heading "The potential to reduce populations" on page F-5 of Appendix F (ANILCA 810 evaluation) in the Final EIS. However, some increases in ORV use will occur due to improved trail conditions. Numerous commenters have noted that the trails in their current degraded condition provide a deterrent to some ORV users.
N075-27	For these reasons we dispute the findings of the ANILCA 810(a) Summary and Evaluation and request that it be modified. Alternatives 4 and 5 will result in moderate to major impacts depending on the season, specific trail, hunting management unit and NPS land status.	NPS maintains that the ORV use predicted for recreational and subsistence use on improved trails under Alternative 5 is reasonable, given the number of recreational ORV users (including hunters) who would be attracted to an improved trail (Tanada Lake) that offers a recreational destination as well as sport hunting opportunities (sheep hunting in the wilderness preserve). This level of predicted ORV use justifies the moderate impact on wildlife described on page 4-98 of the Draft EIS, based on the Impact Threshold Criteria shown on pp. 4-83 and 4-84 of the Draft EIS. These findings were used in the ANILCA 810(a) Summary and Evaluation to conclude that Alternative 5 is "anticipated to have a moderate negative impact on the numbers and distribution of important subsistence wildlife resources" (Draft EIS, page F-5). However, the Final EIS will re-analyze the effects to wildlife predicted for Alternative 4, based on the adjusted numbers described in the response to comment #N073-21.
Wilderness - Existing Conditions		
N017-19	The Act refers to "a primitive...type of recreation" (3-82). ATV riding (and snowmachining) are hardly "primitive" forms of recreation. But instead of primitive recreation, the DEIS uses in several places terms like "primitive quality" (3-82) and "primitive experience". It may be a subtle difference, but failing to use the exact phrase "primitive...recreation" makes the inappropriateness of motorized recreation in Wilderness less obvious or stark; it seems to avoid calling a spade a spade. Similarly, there is less emphasis than there should be on the Congress's concern about "growing mechanization." The words of the Act are powerful and deserve emphasis and repetition.	The NPS agrees that ORV riding is not a primitive form of recreation. None of the alternatives considered in the Draft EIS considers permitting recreational ORV use in the designated wilderness. ORV use to access subsistence opportunities in the designated wilderness is permitted in all alternatives, consistent with ANILCA and the findings of the 1986 Wrangell St. Elias National Park and Preserve General Management Plan. See Section 1.7.3.7, page 1-23 of the Draft EIS. The use of snowmachines in the wilderness is outside the scope of this EIS. See Section 1.1, page 1-1 of the Draft EIS.
Wilderness - Environmental Consequences		
N078-42	Page 4-155, second paragraph: The second sentence states "...the anticipated increase in ORV use associated with improved trails would result in moderate impacts to opportunities for solitude and a primitive experience." This impact would also be associated with anticipated use of proposed new, non-motorized trails. We recommend clarification to remove potential bias	Thanks for the comment. This sentence will be clarified in the Final EIS as follows: "...the anticipated increase in ORV use associated with improved trails and increase in non-motorized use in association with non-motorized trail construction would result in moderate impacts to opportunities for solitude and a primitive experience."

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N085-23	The difference between an evaluation of wilderness as an impaired resource in Alternative 4 and the evaluations of wilderness in Alternatives 1, 2 and 3 as not impaired is contrived and makes no numerical or analytical sense. Table G-1 says that because of off-trail use (by subsistence users) in Designated Wilderness, that Alt 4 would reach Impairment in wilderness character. There only difference between Alt 4 and Alts 1, 2, and 3 in this regard is that there are projected to be fewer off-trail users in the future in the 1, 2, and 3 scenarios (the numbers of which are mathematically off - see point #3 above). But that just means that there may be more mudholes in designated wilderness from Alt 4, while many ORV "social trails," tracks, and get stuck areas will happen in both types of wilderness (with both types managed "for the preservation of the physical wilderness resources ...[and] wilderness character" Management Policies 6.3.1) under all alternatives. Even the evaluation of Alt 5 in Table G-1 is not correct, in that the "containment of off-trail impacts," which hopefully would occur in designated Wilderness, is an illusion under this alternative for the eligible wilderness, where off-trail impacts from increasing subsistence use off the Tanada and Copper an Boomerang improved trails would be managed after they are observed, with the penalty that subsistence users just have to move ten feet away from the newly closed recovering "trail" to create a new one, likely in wetlands, through use.	The projected numbers for subsistence ORV use on the Tanada and Copper Lake trails under Alternative 4 will be adjusted. Based on the revised projections, impacts will be re-evaluated in the Final EIS. Based on the 2010 "Interim Guidance for Impairment Determinations in NPS NEPA documents" the Final EIS includes Appendix A, which is an impairment determination for each impact topic for Alternative 6 (the preferred alternative). Consistent with the Interim Guidance, the Final EIS does not include impairment determinations for the other alternatives.
Visitor Opportunities and Access - Existing Conditions		
N010-1	The distinction that you draw between sport and subsistence activities was not recognized by those people or myself, either then or now... The fact that the resources feed families is the main focus.	The Draft EIS makes no distinction between the effects of subsistence ORV use vs. the effects of recreational ORV use, other than to quantify the projected numbers of each type of ORV user per alternative. There is a regulatory distinction. Page 3-63 of the Draft EIS explains the eligibility requirements for hunting on the lands designated as National Park. As explained on page 1-15 of the Draft EIS, changes to the Federal Subsistence Regulations are outside the scope of this EIS. (Same response for N010-1 and N010-3)
N010-3	No distinction should be drawn between what you call subsistence users and Alaska residents seeking public resources for personal consumptive use. The tow are one and the same.	
N010-4	Personal consumptive use is not a recreational purpose. Examples of recreation purposes would be hiking, camping, and photography	For the purposes of the Draft EIS, recreational ORV use includes the use of ORVs associated with sport or general hunting in the preserve by those not engaged in federal subsistence uses, as well as camping, photography, fishing, or other recreational pursuits. A definition of "Recreational ORV use" will be included in the glossary of the Final EIS. The Draft EIS acknowledges that "a major component of recreational ORV use includes the use of ORVs to support sport hunting. This includes accessing dispersed campsites and potentially transporting harvested meat" (Draft EIS, page 3-20).
N010-5	The only hunting or fishing falling under the heading of sport is guided pursuit of trophy	The term "sport hunting" as used in the Draft EIS includes general hunting under State hunting regulations. The definition of "sport hunting" will also be provided in the glossary of the Final EIS.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N017-9	NPS seems at times to share this attitude, appearing to ignore the possibility of non-motorized travel as a means of "access" (e.g., 3-88; "Away from the road corridor, access is by airplane, snowmobiles, and/or ORV...."; see also ES-6).	Non-motorized uses are acknowledged on page 3-86 of the Draft EIS, and the effects of ORV use on non-motorized activities are described for each alternative in the "Visitor Opportunities/Access" portion of Chapter 4 beginning on page 4-158 of the Draft EIS. Non-motorized hiking trails and routes are also proposed within the range of management alternatives considered in the Draft EIS. However, the sentence you refer to in your comment will be changed in the Final EIS to read as follows: "Away from the road corridor, most access is by airplane, snowmobiles, and/or ORV..."
N051-1	Please consider that the majority of "recreational" users of these trails are actually "traditional" users and most have a long history of trail and resource use within their families.	Page 3-20 of the Draft EIS will be edited to include a more detailed characterization of recreational ORV users. The revised narrative will include a description of the component of recreational ORV users who have ties to the area or who have used the trails for many years. The Draft EIS acknowledges that most of the trails were in existence when the park was created (first paragraph, page 3-10, Draft EIS). However, this does not change the eligibility requirements for federally qualified subsistence users in the park/preserve, as described on page 3-68 of the Draft EIS.
N060-1	ATV (3, 4 or 6 wheelers) use in the Wrangell - St. Elias National Park is not a customary and traditional use	The determination that ORVs were a traditional means of access for subsistence activities was made in the Wrangell St. Elias National Park and Preserve 1986 General Management Plan (Draft EIS, section 1.7.3.7, page 1-23)
N073-19	Use of the term "recreational": The term "recreational ORV use" is misleading. The vast majority of non-subsistence ORV use in Wrangell-St. Elias National Park and Preserve is by other Alaskans hunting and fishing under general State of Alaska hunting and fishing regulations. This is a very utilitarian use in that it provides access in support of a traditional activity. In many cases, these users include former local residents who have moved to urban areas for employment and education, making them ineligible for federal subsistence, but who are members of families that have customarily and traditionally engaged in subsistence uses in the park. We are concerned that the term "recreational" does not accurately reflect the nature of this use. Our recommendation is that ORV use be managed using the following three user classes: subsistence, other traditional hunting/fishing, and recreation. In the event that it is necessary to restrict use, recreational use would be restricted first; other traditional hunting/fishing, second; and subsistence only as a last resort.	The Draft EIS characterizes recreational and subsistence ORV use on page 3-20. This discussion acknowledges that "a major component of recreational ORV use includes the use of ORVs to support sport hunting" (Draft EIS, page 3-20). However, this discussion will be expanded in the Final EIS to include the approximate percent of recreational ORV users who are engaged in hunting activities. Additionally, "recreational ORV use" will be defined in the glossary of the Final EIS.
N075-13	Administrative use of the trails should be included in the analysis	Administrative use was included in data gathered via trail counters and so is included in the projected use estimates shown in Table 4.1. This information will be explained in the Final EIS under section 4.1.1 and there will be a discussion of Administrative ORV use included in the characterization of trails users under section 3.3.2.3 (labeled "Subsistence vs. Recreational ORV Trail Use" in the Draft EIS). Additionally, administrative use will be discussed in the Final EIS under section 2.3 (Actions Common to All Action Alternatives). (Same response for N075-13 and N075-14).
N075-14	We can expect long term administrative use to increase and become available for maintenance and required monitoring continue. Use of ORVs by permitted researchers should be included in this category.	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-16	Our observation is that use of the Nabesna area trails by subsistence users has been stable over the last 10 years or even decreased. The population of Slana and surrounding areas has declined. The cost of fuel and limited time for hunting makes it unlikely that even with increased access subsistence users would travel in greater numbers from Glennallen, Kenny Lake or McCarthy.	Please see the response to comment #N073-21 (Subsistence). Based on this and similar public comments, projected subsistence ORV use numbers will be adjusted for the Copper Lake and Tanada Lake trails under Alternative 4.
N078-13	We suspect the increase in recreational ORV use permits issued between 1985 and 2005 is largely attributable to increased compliance	Thanks for your opinion. We disagree, based on conversations with long-term residents along the Nabesna road (NPS, 2008d).
N078-39	Page 3-1, 3.2, first paragraph: We request this discussion more accurately reflect the actual distance and length of time it takes to travel to the Nabesna area from Anchorage. Although the border of the park is "less than 200 miles east of Anchorage," the highway distance to the beginning of the Nabesna Road is 263 miles, taking approximately 5 hours travel time. Since that is significantly longer than 200 miles on a typical interstate highway elsewhere, some readers may reach inaccurate conclusions about the area's accessibility	The Final EIS will be changed to more accurately reflect the actual driving time required to reach the trailheads from Anchorage or Fairbanks.
N081-17	On more than one occasion, muscle-powered travel, which certainly is as traditional as one can get, is not acknowledged as a means of access. Instead, the document tells us that "away from the road corridor, access is by airplane, snowmobile, and/or ORV...." (ES-6). This needs to be corrected. Access by foot should be emphasized, not ignored	The primary focus of the Draft EIS is the effects of Off Road Vehicles. However, non-motorized uses are acknowledged frequently throughout the document, including Chapter 2 (proposals for non-motorized trails and routes); Chapter 3 (individual trail descriptions, pp. 3-10 to 3-15; and description of visitor facilities and activities, pp. 3-84 to 3-87); and Chapter 4 (Effects on Visitor Opportunities and Access, pp. 4-158 to 4-169).
N125-1	Conflicts between quiet recreational users and motorized users are highly exaggerated.	Page 4-168 of the Draft EIS discusses impacts to non-motorized users as a result of implementing the alternative that would result in the most long term motorized use. It describes some negative impacts but concludes "On balance, Alternative 5 would result in a substantial increase in visitor opportunities for non-motorized backcountry users that would be considered a beneficial impact" (Draft EIS, page 4-169).
N131-3	Also, it would be prudent for the Park Service to define what an ORV is. There are many definitions from different agencies. However, in recent years the ORV market has expanded to the use of Side by Side vehicles which can carry 2 - 6 passengers.	The definition of Off Road Vehicle provided in the glossary of the Draft EIS (page 6-14) will be edited in the Final EIS to include the new side-by-side all terrain vehicles. It will also be edited to clarify that ORV does not include snowmachines.
N148-15	In truth, there seem to be five distinct ORV user groups in WRST; four are listed in order of priority, from highest to lowest, 1) inholders, 2) subsistence, 3) sport hunters & fishermen, and 4) pure recreational. A fifth group is actually administrative NPS personnel, and that use is omitted from consideration in the EIS. Trail crews should log many trips during construction activities, hauling materials and personnel, and their impacts may be substantial. NPS monitoring and maintenance use of the trails will be necessary. The study seems incomplete without these impacts.	Administrative use was included in data gathered via trail counters and so is included in the projected use estimates shown in Table 4.1. This information will be explained in the Final EIS under section 4.1.1 and there will be a discussion of Administrative ORV use included in the characterization of trails users under section 3.3.2.3 (labeled "Subsistence vs. Recreational ORV Trail Use" in the Draft EIS). Additionally, administrative use will be discussed in the Final EIS under section 2.3 (Actions Common to All Action Alternatives).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
Visitor Opportunities and Access - Environmental Consequences		
N014-1	I urge you not to adopt a set of double standards (one for recreational users and one for those living in close proximity). In devising your plan please keep in mind that you are managing public land - land that belongs to all of us regardless of where we live. All off-road vehicles contribute to the problem, not just those of the recreational users. Make your regulations fair and applicable to all of us.	The Draft EIS makes no distinction between the effects of subsistence ORV use vs. the effects of recreational ORV use, other than to quantify the projected numbers of each type of ORV user per alternative. There is a regulatory distinction. Page 3-63 of the Draft EIS explains the eligibility requirements for hunting on the lands designated as National Park. As explained on page 1-15 of the Draft EIS, changes to the Federal Subsistence Regulations are outside the scope of this EIS.
N016-5	All ORV users should be permitted and charged use fees. Permitting helps build credible use data; not having that data for over 1/2 the current ORV use is not scientifically based.	Section 101 of ANILCA describes the broad purposes of conservation system units throughout Alaska, including "Provide the opportunity for rural residents engaged in a subsistence way of life to continue to do so" (Draft EIS, page 1-8). Wrangell St. Elias National Park and Preserve is "an inhabited area where local communities and traditional activities remain integrated within the wilderness setting" (Draft EIS, page 1-10). As such, charging fees for subsistence ORV use or requiring permits for that activity is not necessary or appropriate.
N016-10	The draft Nabesna ORV EIS lacks an objective analysis of motorized use in the WRST Preserve. ANILCA guarantees of continued traditional use by inholders, federally qualified subsistence users and non-locals within the federal conservation unit are held dear by Alaska's outdoors people.	We disagree that the Draft EIS lacks an objective analysis of motorized use in the WRST preserve. A substantial portion of the analysis in Chapter 4 of the Draft EIS is devoted to describing impacts from motorized use on trails in the preserve. The effects on opportunities for motorized use in the analysis area are displayed for each alternative under the "Visitor Opportunities/Access" portion of Chapter 4 starting on page 4-158 of the Draft EIS. In response to the second part of your comment, ANILCA (section 1110) provides for snowmachines and certain other means of transportation to access traditional activities in conservation system units, but ANILCA does not provide for the use of ORVs for recreational purposes (including general or sport hunting in the preserve).
N017-13	At 4-179 the document refers to motorized trails as "shared-use" trails; at other places we believe the term "multi-use" was employed. These are unfortunate terms, which ignore the fact that the benefits of the "sharing" are not equal. There is very little impact to the motorized user when a non-motorized recreationist uses the trail, but there is clearly an adverse impact to the muscle-powered user when he/she encounters the sights and sounds, or experiences the other impacts, of motorized use.	The terms "shared use" or "multi-use" are used in the EIS to describe that a trail is not used exclusively as motorized or non-motorized or that the trail may be improved or constructed to accommodate both uses. The use of these terms does not imply that there are no effects associated with shared-use trails. The effects to non-motorized users from ORV use are described for each alternative in "Visitor Opportunities/Access" section of Chapter 4 beginning on page 4-158 of the Draft EIS.
N017-14	But it's also the case that the experience is diminished by seeing evidence of ORV use—that is, trails that have obviously been seriously degraded by such use.	The Draft EIS describes the effects of degraded trails and motorized use on non-motorized users in the "Visitor Opportunities/Access" section of Chapter 4 beginning on page 4-158. For example, "some non-motorized backcountry users probably avoid using the ORV trail system because of deteriorated trail conditions, shifting their activity to off-trail areas or trail opportunities elsewhere in the region" (Draft EIS, page 4-159).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N033-1	Also, we would need the ability to gather wood for heat and not allowing chainsaws and ATVs would be very difficult.	The use of chain saws in the park/preserve is outside of the scope of this EIS. And...there is no alternative considered within the Draft EIS that would prohibit the use of ORVs for subsistence uses (such as firewood gathering). Alternatives 3, 4, and 5 consider monitoring and management actions that could effect the use of ORVs for subsistence purposes.
N072-46	We found Table 4-1 perplexing and we question the rationale applied to project ORV use on improved trails under Alternatives 4 and 5, as well as the analysis of their environmental consequences and the subsequent selection of Alternative 5 as the park's environmentally preferred alternative.	Assumptions used for Table 4-1 are as follows: For Alternatives 1 - 3, future projections were based on past permitting records and trends (see page 4-2 of the Draft EIS, last two paragraphs). For the alternatives that include trail improvements (4 and 5) projected use was based on a trail-by-trail analysis using several assumptions: 1) if trails were improved, the hunting component of recreational use would increase but would be influenced by State hunting regulations (page 4-2, seventh paragraph); 2) the purely recreational component of recreational ORV use would increase, sometimes significantly, based on if the trail accesses a particular recreational destination; and 3) for the subsistence component of projected ORV use, the biggest factor was competition with recreational ORV users. If recreational ORV use would be permitted on an improved trail (Alternative 5), the projection for subsistence ORV use is a slight to moderate increase. If recreational ORV use is not permitted on certain improved trails (such as trails in the park in Alternative 4) we projected a significant increase in subsistence ORV use. However, based on public comment, we have adjusted the subsistence ORV use projections for the Copper and Tanada trails for alternative 4 and will re-analyze the effects for those trails under that Alternative in the Final EIS. (Same response for N072-46, N072-47, N072-48, N072-49, and N075-08) Additionally, the Final EIS analyzes effects of a sixth alternative which is a combination of elements of Alternatives 4 and 5.
N072-47	According to Table 4-1, the overall ORV use level is almost the same for both alternatives, with Alternative 4 projected to have 1,771 total round trips (both recreation and subsistence) and Alternative 5 is slightly less at 1,679. There is no discussion in this document about the development of these use projections or why the assumption was made that subsistence use on Copper and Tanada Lake trails in Alternative 4 is almost double that of Alternative 5 when the main difference is that recreational riding is not permitted in Alternative 4. Further, there is no discussion to explain how a lack of recreational riders, as provided in Alternative 4, results in a four-fold increase in subsistence use over current use levels on the Tanada Lake Trail and an almost 3-fold increase on the Copper Lake Trail. Please clarify and explain.	
N072-48	The overall similar use level projections result in similar environmental consequence projections, arguably providing the Park Service with an advantage to selecting Alternative 5 as its environmentally preferred alternative because it appears to cause no more impacts than Alternative 4, despite its generous accommodation of recreational ORV use on the national park trails. Alternately, we would argue that with no recreational riding on these two park trails, their overall use under Alternative 4 would be less and, therefore, so would the environmental consequences.	
N072-49	Therefore, we disagree with the assessment that Alternative 5 is environmentally preferable and argue that Alternative 5's proposal to allow recreational ORV users on Tanada Lake and Copper Lake trails significantly increases the potential cumulative impacts to trail corridors and park resources by inviting the additional subset of recreational ORV users who are unlikely to possess resource stewardship ethics similar to local motorized trail users. Further, recreational ORV use on the park trails could significantly increase negative impacts to subsistence users and resources, such as wildlife displacement, pressure and competition. We support Alternative 4 as the environmentally preferred alternative.	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-8	In the case of environmental consequences in designated wilderness, use is project to nearly triple. We question the methodology, data and analysis leading to the projected increase in ORV use particularly with respect to subsistence ORV use in designated Wilderness.	
N073-12	In planning for non-motorized trails and routes, it will be important to take possible conflicts with subsistence use areas and subsistence users into consideration. For example, the draft EIS mentions a trail accessing the Copper River at approximately Mile 4 on the Nabesna Road. There is an existing subsistence access route very close to this location.	Implementation of proposed non-motorized trails and routes will require some level of NEPA compliance. This will include, for each project, an ANILCA 810(a) Summary Evaluation and Findings which includes an evaluation of potential effects on 1) potential of the action to reduce important subsistence fish and wildlife populations; 2) what affect the action might have on subsistence fisher or hunter access; and 3) the potential for the action to increase fisher or hunter competition for subsistence resources.
N075-9	Table 4.1 does not include administrative uses of the trail.	Administrative use was included in data gathered via trail counters and so is included in the projected use estimates shown in Table 4.1. This information will be explained in the Final EIS under section 4.1.1 and there will be a discussion of Administrative ORV use included in the characterization of trails users under section 3.3.2.3 (labeled "Subsistence vs. Recreational ORV Trail Use" in the Draft EIS). Additionally, administrative use will be discussed in the Final EIS under section 2.3 (Actions Common to All Action Alternatives).
N075-15	Should funding be limited the projections in Table 4.1 are not at all reasonable. Table 4.1 does not take into account the possibility of restriction to access based on monitoring.	Alternatives 4 and 5 of the Draft EIS propose to fix most of the existing degraded trails. In order to evaluate environmental effects that would result from these alternatives, we had to assume that the projects would be funded and trails would be improved. For an analysis of effects that would occur on unimproved trails with the proposed monitoring in place, see the environmental effects described for Alternative 3 in Chapter 4 of the Draft EIS.
N078-11	Throughout the DEIS there are references to an expected doubling of trail users should trails be improved. There is little evidence for this given the patterns over the past 20 years.	Please see the response to comment #N073-21 (Subsistence). Based on this and similar public comments, projected subsistence ORV use numbers will be adjusted for the Copper Lake and Tanada Lake trails under Alternative 4.
N078-12	Given the distance from major population centers and the lack of private recreational property off the Nabesna Road, we do not expect to see high numbers of recreational ORV riders in this area.	Significant increases in recreational ORV use are predicted under the following scenario: where currently degraded trails are improved and a particular trail leads to an attractive recreational destination (for example, Caribou Creek, Soda Lake, Copper Lake, or Tanada Lake trails). These projections are based on the following: 1) Table 4-1 predicts use 10 years out into a 20 year planning period; and 2) "If trails were improved, the recreational component of ORV use (access to non-motorized activities, dispersed camping, or sport fishing) would increase" (Draft EIS, page 4-2). The Swede Lake trail primarily serves as an access route to the Alphabet Hills and moose and caribou hunting opportunities. (Same response for N078-12 and N078-15)
N078-15	The Swede Lake Trail at milepost 16 of the Denali Highway is similar to the Nabesna ORV trails in that it is primarily utilized by hunters. After trail hardening, Bureau of Land Management managers have not noted significant levels of increased usage. Instead, managers have found that use on the trail is dependent on the movements and the availability of the wildlife resources in the Swede Lakes area. Nabesna ORV trail use will most likely follow a similar pattern. Wildlife populations and the ability to hunt drive recreational use on the Nabesna ORV trails more than trail conditions	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N078-22	In particular, hunters access sheep and moose hunting areas within the preserve using the Tanada Lake Trail. The Goat Creek / Wait Creek area is another extremely popular sheep hunting area in the preserve. Loss of the Tanada trail for recreational ORV use would effectively eliminate an affordable hunting opportunity.	We agree that loss of the Tanada trail for recreational ORV use would effectively eliminate an affordable motorized hunting opportunity. The Draft EIS states "Current recreational ORV users of the above trails (including Tanada Lake) would be displaced to other trails in the analysis area or to areas outside the park..." (Draft EIS, page 4-166).
N078-23	While the proposed non-motorized route from the end of the Nabesna Road may offer an alternative to those who desire a non-motorized hunting experience, it would not be a practical alternative for many hunters with heavy loads. In particular, given the alternative is a 20 mile "route," it would effectively preclude access to hunting parties that include children, the elderly, or the disabled. As a result, some hunters in the preserve may resort to access by aircraft, thereby concentrating hunting into smaller areas and potentially increasing resource impacts.	We agree that the proposed Wait/Nabesna route would not be utilized by hunters with heavy loads. We're not sure how increased aircraft access to support hunting activities would result in increased resource impacts, particularly in light of the resource impacts associated with ORV use on degraded trails.
N079-9	In determining the anticipated environmental impact of any of the alternatives, current, actual permit numbers should be used as supporting data, rather than future, projected numbers. It is both inaccurate and irresponsible to attempt to project future impacts by guessing at the level of future use when an assumption of increased future activity is used as the basis	Projected estimates of ORV use levels were based, in part, on current permitted numbers and on past trends in permit numbers (Draft EIS, page 4-2, last two paragraphs). However, it would be inaccurate and misleading to "freeze" current permitted numbers when evaluating environmental effects over the next 20 year period.
N085-17	The numbers in Table 4-1 are important to inform all of Chapter 4, and I'm sure they are based on the best information that the park has, but it could be made more clear what math is in the predictions. The explanation on p.4-2 says that "This table lists the average ORV use (round trips) that would be likely each year, for the next 20 years, to gain access to the trails considered within the analysis area." The increase from the "Current Conditions" to Alt 1 is 20% for subsistence use. At a 2% increase per year (p.4-2), this would mean that the increase portrayed in Alt 1 is a number that is about halfway through (10 years) the 20-year planning period. This would be understandable if carried through consistently for the Alt 1 numbers in Table 4-2, but it isn't. The Rec Orv use also works out to 2% per year ("For the alternatives with no trail improvements, predicted recreational ORV use levels are based on past ORV permitting trends. With no trail improvements, recreational ORV use has increased at a rate of 6.4 users per year over the 15-year period from 1990 to 2005")(p.4-2). Subtracting 6.4 users per year for 15 years yields a 2% increase over that 15 year period. But the increase for Rec users from "Current Condition" to Alt 1 in Table 4-1 gives a 35% increase, which would be almost double the subsistence user increase.	For unimproved trails in alternatives 1, 2, and 3, Table 4-1 assumes an increase of 3% per year for recreational ORV users and 2% per year for subsistence ORV users. These percentage rates were based on past permit trends (for recreational ORV users) and harvest and permit data (for subsistence ORV users). Numbers presented in Table 4-1 are calculated for 10 years out as an average for the 20-year planning period.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
Visitor Opportunities and Access - Cumulative Impacts		
N057-1	Another reason to not open Park Land to vehicular invaders is once they get any kind of vehicular admittance, they not only do other destructive things but always want more & more access as the area they're in is soon so spoiled that they no longer want it but an alternant	All but one alternative (Alternative 2, which represents pre-lawsuit conditions) would result in a net loss of motorized access to the park/preserve.
N072-1	We are very concerned that if adopted, Alternative 5 could set a dangerous precedent and open the door to recreational ORVs on trails in other national parks around the country, as well as perpetuate the unfortunate and unacceptable proliferation of park resource damage due to off- road vehicles that has been allowed to occur at Wrangell-St. Elias National Park and Preserve.	Based in part on public comment on the Draft EIS, the Final EIS includes consideration of a sixth alternative that combines elements from the Draft EIS Alternatives 4 and 5 and would not permit recreational ORV use on trails (improved or unimproved) in the park.
Socioeconomics - Environmental Consequences		
N072-23	While the collection of fees in this time of declining budgets sounds positive, we request an analysis of the cost of administering a fee program as compared to the anticipated revenue.	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program. (Same response for N072-23 and N142-3)
N142-3	The user-fee may simply encourage some recreational users to either access these trails on foot or choose one of several other no-fee areas designated for recreational ORV use in the region.	
N072-50	These use level projections in Table 4.1 do not appear to anticipate commercial development of the inholdings at Copper and Tanada lakes or any related commercial client ORV access that could be authorized under a Right-of-Way-Certificate of Access. We request that the final EIS include an analysis of this scenario and a recognition that should such activity develop, additional NEPA review would be needed before such activity could be allowed	Table 4.1 does include an estimate of current and anticipated ORV use for accessing inholdings (page 2-8, first full paragraph, Draft EIS). The projected numbers do NOT assume a large increase due to commercial development at Copper or Tanada Lake, because there is no indication at this time that will happen. If commercial development does occur and there is increased demand for access to private inholdings, it will be addressed at that time. See section 1.8.2 and 2.3 (ORVs for Accessing Private Inholdings) of the Draft EIS.
N142-2	Airplanes are already allowed to fly relatively low over the ParkIPmserve, an equal or greater negative effect on a wilderness esthetic than passing ORVs. Alternative 4 at least provides access for other users who may not be able to afford or choose this means of access.	Discussion of the impacts of airplanes on wilderness is included for each alternative in the Solitude or Primitive and Unconfined Quality section of the Wilderness impact topic, pp. 4-138 to 4-154 of the Draft EIS. Impacts from airplanes on natural soundscape is included on page 4-179 of the Draft EIS. We agree that both Alternatives 4 and 5 maintain existing trails (in an improved condition) that provide alternative means of access.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
<i>Natural Soundscapes - Environmental Consequences</i>		
N017-15	We appreciate the sampling efforts, although they were of course extremely limited (we certainly hope that substantial additional sampling/monitoring will be undertaken in the future), and the attempt to analyze the effects of the five alternatives on the natural soundscape. We are of course disappointed, however, that the agency's preferred alternative does not appear to include any measures that would reduce the incidence of artificial, mechanical sounds; we would be happy to have this impression corrected if we're wrong.	Alternative 5 of the Draft EIS does predict an increase in motorized use over existing conditions. However, because of improved trails, ORVs would be less likely to deviate from improved and designated trails. Alternative 5 also proposes designation of trails in the Wilderness for subsistence ORV users, thus minimizing off-trail use.
N017-16	When the subjects of 1. natural sounds and natural quiet (and the magnitude of unnatural sounds), that is, the natural soundscape; and 2. artificial noise from motorized vehicles, are addressed, planners, land managers, the public, and others often (and it seems hard to avoid) lump two issues together: the effects of that noise on the natural soundscape, an independent natural resource like clean air and water and scenic beauty which includes the effects of mechanical noise on not just humans but also wildlife; and the effects of that noise on the quality of the experience for non-motorized human recreationists seeking a quiet, natural experience. The first is an ecological issue, the second a social one. Both issues need to be analyzed, and both the natural soundscape and opportunities for high quality muscle-powered recreation need to be protected—or restored—to the greatest extent reasonably possible.	Effects of ORV noise on wildlife is discussed as direct disturbance in the Wildlife portion of Chapter 4 of the Draft EIS (pp. 4-84 to 4-98). Effects of ORV noise on the quality of experience for non-motorized recreationists is discussed in the Visitor Opportunities/Access portion of Chapter 4 (pp. 4-158 to 4-169). Alternatives 4 and 5 attempt to minimize impacts to natural soundscape by improving trails, thereby containing impacts to areas within .5 miles of the improved trail (Draft EIS, page 4-186, first paragraph). The Draft EIS also predicts an improvement in non-motorized opportunities because of the construction or location of non-motorized routes and/or trails proposed under Alternatives 4 and 5 (page 4-166 and 4-168, Draft EIS).
N017-17	The analysis of the natural soundscape seems to focus on two issues: the decibel level of sounds, and the number of times a visitor would encounter unnatural sounds. Other issues which need to be addressed in analyzing this mixed question of non-motorized visitor opportunities and the natural soundscape include the character of the sound (is the pitch high or low?; does it rise and fall (which can be extremely irritating)?); at what time of day is the noise made (mechanical noises are generally more irritating when a person is hoping to relax at camp in the morning or evening, or trying to sleep)?; and what are the visitor's desires and expectations?	A general characterization of "typical" ORV noise in the area will be included in section 3.5.7.1 of the Final EIS.
N017-18	In the latter regard, the question of whose experience will be measured is an issue that is relevant to several of the resources/experiences/etc. that are being analyzed. With regard to ORV sounds on the nine (and other) trails, focusing on travelers on the Nabesna Road (who are characterized, it seems, as the "typical visitor" (2-55)) would appear to be inappropriate...The quality of our experience can be adversely affected by even a single ORV encounter if we think we're in an area where we won't have any such encounters; or if we realize that we won't be able to escape the noise of ORVs but head out anyway because there are few alternatives, the quality of our experience will be less than it would have been in a quiet situation.	The Natural Soundscapes portion of Chapter 4 describes anticipated impacts to the natural soundscape for each of the proposed alternatives. The Visitor Opportunities/Access section (pp. 4-158 to 4-169) discusses impacts to non-motorized visitor experience from ORVs.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N076-11	In the vast Alaska landscape, the sound effects of ORV use (recreational and subsistence) are negligible. This is especially true since aircraft use per ANILCA § 1110(a) is assured in the area and ensures that "natural silence" is already impacted.	The Draft EIS concludes that the effects to natural soundscape (for each alternative analyzed) are minor, based on the impact threshold criteria described on page 4-178 of the Draft EIS.
N081-14	Road noise can relatively quickly be left behind, while the noise from sources running perpendicular to the road and far into the backcountry is much harder to escape	The Draft EIS acknowledges this by discussing impacts to soundscape associated with ORV use on the trails. The impacts to non-motorized visitor experiences are described in the Visitor Opportunities/Access section of Chapter 4 (pp. 4-158 - 4-169).
N148-17	Agencies carry the soundscape idea too far when they start to limit residents' ability to get subsistence resources. And, human residents should always have a higher priority than non-human ones.	The Natural Soundscapes portion of Chapter 4 of the Draft EIS describes impacts to natural soundscapes as minor for all alternatives. This conclusion is not used as the basis for proposing any limitations on subsistence ORV users.
Natural Soundscapes - Cumulative Impacts		
N017-24	In a number of places, the DEIS suggests that ORV noise impacts are less important than they might otherwise be because they are only one of several sources of noise in the analysis area (see, e.g., 3-97). This is substantially flawed reasoning, and it's the same reasoning that is frequently put forward by motorized recreationists (most commonly, that ATV or snowmachine noise isn't important because there are always commercial airplanes flying overhead anyway). In fact, in virtually every case, the more noise the bigger the conflict and problem, and eliminating or reducing any source of noise is beneficial.	The Draft EIS does not state that ORV noise impacts are "less important." Page 3-97 of the Draft EIS states that "ORV use is a small component of the total motorized use in the analysis area" (Draft EIS). This is based on the traffic volume figures for the Nabesna road that follow that statement. The Chapter 4 discussion of Natural Soundscapes (Draft EIS, pp. 4-178 to 4-185) include airplane and traffic noise as other direct and indirect impacts to the natural soundscape.
Adequacy of Alternatives		
N007-2	You appear to base your draft proposed approach primarily on comparative impacts to soils and recreation; despite acknowledging that Alternative 5 will much more severely and negatively impact wildlife and, both directly and cumulatively (despite your downplaying of these impacts) subsistence than Alternative 3.	The impacts to wildlife expected from Alternative 5 are described as moderate, not severe or major, and would not be expected to affect the viability of any wildlife populations (Draft EIS, page 4-98).
N010-2	To accommodate tracks of sufficient size, a vehicle must necessarily weigh more than three thousand pounds. A practical cutoff might be six thousand pounds, give or take.	A maximum tracked rig width of 5.5 feet and weight of 4,000 lbs. was chosen because it accommodates weasels, some of which are still in use in the area. Vehicles above this weight and size present a long-term problem for trail improvement and maintenance. For example, trying to construct and harden a trail tread to accommodate a wider vehicle would require an 8 foot tread width, thus significantly increasing the cost of hardening trails.
N010-6	Limitation of rubber tracked vehicles on Nabesna Trails to 4,000 lbs and 5.5 feet in width ignores the state of technology of the most benign forms of transport available. Even a huge cash outlay could not produce a more trail friendly rig than my vintage Thiokol. It is 7 feet wide because of its 26 inch tracks, weighs 3000 pounds empty, and lay 6000 square inches of pliable rubber trail before it as it goes. A four wheelers trail is more obvious than mine. If the most sensitive trail is to be limited to track vehicles only, as the plan states, just what type did you planners have in mind?	Please see response to comment #N010-2. Use of the Boomerang trail would be limited to tracked rigs not exceeding 5.5 feet in width or 4,000 lbs. This would accommodate a weasel type track rig.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

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N010-7	Most trails originally kept as straight a line as possible, detouring only around the wettest ground. Re-routed trails are not run over ground most suitable for the best ORV's as claimed. They wind through timber haphazardly, where only a small rig can follow	If the term "best ORV's" in your comment implies large track rigs, then you are correct. It is not economically feasible to design sustainable trails for every class of ORV that exists.
N060-2	There should be no discrimination amongst user groups. The subsistence users riding an ATV do just as much damage as a recreational user riding an ATV. Consequently, NPS should establish/construct/upgrade designated trails for all ATV users regardless of their life style.	The Draft EIS makes no distinction between the effects of subsistence ORV use vs. the effects of recreational ORV use, other than to quantify the projected numbers of each type of ORV user per alternative. There is a regulatory distinction. Page 3-68 of the Draft EIS explains the eligibility requirements for engaging in subsistence activities in the park and preserve.
N069-4	It appears to us that Alternative 5 (the NPS preferred alternative and the specified environmentally-preferred alternative) does not provide for fidelity to this policy and the laws and Executive Orders it references. The EIS recognizes that the trails in the study area already have been, in some cases, severely impacted, if not actually impaired. NPS has not taken action to close these areas in accordance with the provisions of policy and law. Moreover, alternative 5 proposes to correct the impacts by improving the trails, rather than reducing or eliminating the causes of the impacts.	The policy referred to in the comment is 8.2.3.1 of the NPS Management Policies 2006, regarding motorized off-road vehicle use. The Executive Order referred to is EO11989 (See Draft EIS, sections 1.7.3.10 and 1.7.3.1 respectively). Alternative 5 of the Draft EIS (identified as preferred) complies with the policy and Executive Order by not permitting recreational ORV use until trails are improved and can meet the criteria of the Executive Order; and by requiring recreational ORV users to stay on improved and designated trails. ANILCA authorizes the use of "surface transportation traditionally employed" for subsistence purposes. As mentioned in previous responses, WRST's 1986 GMP made the determination that ORVs were a traditional means of access for subsistence activities in the park. This use is authorized under 36 CFR 13.460. Under 36CFR 13.460, ORV use for subsistence purposes shall be in compliance with applicable laws and not damage park areas. The Draft EIS concludes that Alternative 5 would result in minor impacts to vegetation, wetlands, and soils and would not result in impairment of park resources.
N072-7	How does the DEIS provide fidelity to the GMP's language that use "be permitted on designated routes, where their use was customary and traditional, under a permit system," particularly given that only under Alternative 5 does the DEIS propose limiting subsistence ORV use to designated trails in Wilderness?	Designation of all trails for subsistence ORV use and requiring subsistence users to stay on those trails is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). However, Alternative 5 of the Draft EIS proposes off-trail monitoring to ensure that impacts associated with off-trail subsistence use do not increase.
N073-14	It is not realistic to expect the Tanada Spur Trail to be non-motorized. People will make motorized use of it regardless of its designation.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. It would improve all nine trails to a maintainable condition, then permit recreational ORV use on improved and designated trails in the preserve. It would re-route the Tanada Lake trail out of wetlands, designate trails for subsistence ORV users in the Wilderness, adopt the proposed Wilderness Eligibility Revision, and adopt monitoring standards/management actions for subsistence ORV off-trail use. It also includes all proposed non-motorized trails and routes proposed in the Draft EIS Alternatives 4 and 5. In the sixth alternative in the Final EIS, the Tanada Spur Trail will be proposed and analyzed as a motorized trail.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N076-14	SVIA opposes Alternative 1. The No Action alternative does nothing to address existing conditions will ultimately result in recreational ORV prohibitions while allowing for continued impacts arising from subsistence ORV use throughout the study area. This Alternative, while providing for some short-term level of recreational ORV access consistent with the NPS's mandate to balance conservation and recreation, ³³ does not take any steps to conserve the natural resources in the Park and Preserve. Furthermore, Alternative 1 fails to meet two of the three components of the NPS's three-fold purpose and need for action, because it does not address impacts to park resources from ORV use (through trail improvements, maintenance, or monitoring) or user conflicts between ORV users and non-motorized visitors (through creation or marking of non-motorized trails).	Alternative 1 has not been identified as the preferred alternative.
N076-15	SVIA acknowledges that Alternative 2 does not present a viable long-term management strategy. Subsistence and recreational ORV usage without trail improvements and maintenance will ultimately lead to unacceptable resource impacts not serve the conservation component of the NPS's dual mandate to balance conservation and visitor recreation. ³⁵ In addition, the lack of improvements and management could lead to many trail segments becoming impassible over time, which would fail to serve the visitor recreation component of the NPS's mandate. Furthermore, Alternative 2 does little to address impacts to park resources	Alternative 2 has not been identified as the preferred alternative.
N076-16	SVIA vigorously opposes Alternative 3. As noted above, banning recreational ORV use makes little sense because the NPS is obligated to provide for subsistence ORV access throughout the Park and Preserve, including all nine trails and off-trail areas. Furthermore, as discussed above, the NPS acknowledges in the DEIS that trail improvements and maintenance will address impacts to the trails and can be designed to keep trails in a maintainable condition, and that regulated ORV use will not impair Park or Preserve resources. Given that subsistence ORV use will continue, there is no valid reason to ban reasonable recreational ORV use, which can be (and has been) regulated through the issuance of permits. Accordingly, the NPS should reject Alternative 3.	Alternative 3 does not meet management objectives as well as Alternatives 4 or 5. Mostly, it does little to improve trails. The Draft EIS concludes that moderate impacts to soil, wetlands, vegetation, and water quality/fish habitat would occur, even without recreational ORV use.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N076-17	SVIA opposes Alternative 4 because it arbitrarily restricts recreational ORV use to those trails in the Preserve. Alternative 4 would allow subsistence ORV use throughout the study area, and acknowledges that improvements, maintenance, and monitoring will be necessary in both the Park and Preserve. Given that the NPS intends to improve and maintain trails in both the Park and Preserve for subsistence ORV use, there is no valid reason to not allow a reasonable level of recreational ORV use, which will impose fewer impacts than subsistence ORV use due to being restricted to trails. The same improvements, monitoring, and maintenance measures will apply to impacts from recreational use as apply to subsistence use, and given that subsistence users average more trips per year than recreational users currently, 36 there is no valid reason to restrict recreational ORV users to the Preserve. Accordingly, the NPS should reject Alternative 4.	The use of any motor vehicle including ORVs is prohibited in national park areas, with certain exceptions, pursuant to 36 CFR 4.10. The regulation provides a limited exception for ORV use on designated routes and areas but only in national recreation areas, national seashores, national lakeshores, and national preserves. The regulation does not authorize designating routes or areas for ORV use in national parks. An Alaska-specific regulation, 43 CFR 36.11(g)(2) authorizes Department of the Interior agencies to issue permits for ORV use on existing trails. Pursuant to that authority ORV use of the Copper Lake and Tanada Lake trails was permitted because those trails existed at the time the park was created. The re-routing of the Copper Lake and Tanada Lake trails precludes application of 43 CFR 36.11(g)(2) as that authorization is limited to existing trails. The re-routed trails were not in existence when the unit was created.
N076-18	However, SVIA opposes one significant feature of Alternative 5 - its ban on recreational ORV use pending improvements to the trails. Those improvements are dependent on funding, and banning recreational ORV use on most of the trails in the study area until the improvements are made presents a back door method for opponents of ORV use to prohibit recreational ORV use despite the NPS's determination that reasonable ORV use does not impair Park and Preserve values and is otherwise appropriate for the study area. Accordingly, while SVIA generally supports Alternative 5's other measures, it urges the NPS to modify its Preferred Alternative to allow recreational ORV use on all trails in the Park and Preserve pending trail improvements, to make a commitment to seeking funding for trail improvements, and to provide for alternative access for recreational ORV use while trail improvements are being made. Continued, consistent recreational access will impose, at most, minor additional impacts above and beyond those imposed by continued, consistent subsistence ORV usage, and therefore banning recreational ORV use prior to or during trail improvements will have little if any beneficial impacts. Furthermore, continued and consistent recreational ORV access will have beneficial socioeconomic impacts on nearby communities and businesses that depend on recreational visitation for revenue.	Alternative 5 of the Draft EIS states that recreational ORV use would be permitted, prior to trail improvement on designated trails in fair or better condition. To continue to permit recreational ORV use on unimproved and degraded trails would be inconsistent with NPS policy and Executive Order 11644. Recreational ORV use on unimproved trails, as documented in the Draft EIS, would lead to "adverse impacts on the area's natural, cultural, scenic, and esthetic values". NPS would not consider permitting recreational ORV use on existing degraded trails under 43 CFR 36.11(g)(2), based on the analysis in the Draft EIS, which concludes that recreational and subsistence ORV use on unimproved trails would lead to major impacts to soils, vegetation, and wetlands.
N078-8	Regarding fees for recreational ORV use, we recommend clarifying that fees will be reasonable and affordable	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N079-5	There is no need for NPS to create new trails, which would consume very large amounts of funding and likely jeopardize expenditures for repair of existing trails	The anticipated cost of construction of new trails is less than the anticipated costs for the repair of existing trails. The Final EIS will include a trail-by-trail cost estimate. New trail construction and existing trail repair are funded from two different sources.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N084-1 N084-2	In reviewing the alternatives, I found none to be completely acceptable given the mandates given in ANILCA and the directions given in the GMP... First, the alternatives that propose no improvements or attempts to identify and maintain "one-trail" alignment would appear to violate the determinations of the GMP (1986) that state "adverse affects would not occur". For the other alternatives, if history is a guide the span of time between studies and a recent inventory (Meyers et al 2007) would suggest the NPS is limited in the resources it has to at first improve trails to "maintainable condition" and second to monitor the conditions of all trails to assure they remain in a "fair or better" state.	We agree that the alternatives that do not propose to fix trails would not result in accomplishment of the project's stated purpose or accomplishment of management objectives for resource protection (Draft EIS, pp. 1-5 and 1-6). We hope the repairs would rate high in the NPS budget system because they protect resources.
N085-9	Are there no usercreated trails in the eligible wilderness and where is the quantification/evaluation of those? Short of closing the off-trail areas to use, there is and will continue to be a "proliferation of usercreated trails" under all alternatives, especially when the access to those areas is improved with trail reconstruction and maintenance.	The potential effects of off-trail use on eligible wilderness is evaluated in Chapter 4 of the Draft EIS, under the Wilderness impact topic, in the discussion under the Eligible Wilderness headings. See, for example, page 4-156, under the discussion on impacts to Natural Quality, the following description: "Vegetation and soil damage associated with current and anticipated low levels of off-trail subsistence ORV use is limited. Within eligible wilderness, this would result in a negligible impact on the natural quality of wilderness" (Draft EIS, page 4-156).
N085-10	If multiple (greater than three) spur trail closures occur along an existing trail. [which existing trail? The one just user- created?] the trail will be considered for designation. with no off-trail ORV travel permitted." (Section 2.4.5) This section is unclear as to impact and starting point. If it refers to a pathway to close the off-trail areas along the Copper Lake trail, for example, there likely are already three spurs existing that would require the Copper Lake Trail to be "designated," with no off-trail use allowed. If that is the case, then you need to fully explain the ramifications about this alternative, including the knowledge about "spur trails" that would start the closure ball rolling and the revised maps that this mitigation would bring about.	Actions proposed in the Draft EIS that would result in designation of trails or monitoring off-trail use would require a baseline map documenting "existing" trails, prior to monitoring starting. This discussion will be included in the Final EIS, under section 2.4.5, under the Off-trail ORV use section.
N085-18	The lack of a plan for management on the Batzulnetas Trail and the Suslota trails continues an impaired condition a) (1) "The Batzulnetas trail	In response to public comment, the Final EIS analyzes a sixth alternative. Under the sixth alternative, the Suslota trail would be repaired to a maintainable condition. The Final EIS analyzes the effects associated with doing this. Repair of the Batzulnetas trail was not considered within the Draft EIS because it is not a public use trail. The Draft EIS states "The Plan/EIS evaluates a range of alternatives and management actions for ORV use and includes specific trail improvements and ORV administration for the following trails: Suslota, Caribou Creek, Trail Creek, Lost Creek, Soda Lake, Reeve Field, Tanada Lake, Copper Lake, and Boomerang trails..." (Draft EIS, page 1-1). The Draft EIS then goes on to explain why these particular trails are the focus of the EIS (page 1-1, Draft EIS). (Same response for N085-18, N085-19, and N085-20)
N085-19	How can you do an ORV plan for a District, have a trail in the District in a "very degraded condition" (mostly from NPS use), and present no plan on what to do about it? I submit that "very degraded conditions" in National Park equals impairment, not "moderate impacts."	
N085-20	The fact that no alternative in the EIS considered improving the conditions on this trail indicates that this document fails as a fully thought-out "...Off-Road Vehicle (ORV) Management Plan for the Nabesna District. ..." (p.1-1) and the EIS fails to address the stated Need for the Plan: "There is a need to address the impacts to park resources that are occurring because of ORV use in the Nabesna Area." (Need #2, p.1-2).	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

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N085-24	The EIS is missing a full range of alternatives, because only two alternatives address the trail construction necessary to work to remove this situation from impairment, and no alternative considers eliminating all off-trail ORV travel.	As you state in your comment, two of the alternatives in the Draft EIS (including the preferred alternative) propose to fix degraded trails in order to minimize resource impacts. Both are fully analyzed in the Draft EIS. Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS).
N099-1	The NPS Preferred Alternative #5 would harden the degraded trail system and codify the continuation of inappropriate Recreational ORV and ATV uses on park and preserve lands. The DEIS does not include the full range of viable Alternatives. None of the Alternatives in the DEIS adequately address the issues within the context of ANILCA and WRST purposes as written and NPS should come back with Alternatives that do.	Alternative 3 of the Draft EIS proposes not permitting any recreational ORV use in the analysis area. However, Alternative 3 does not meet the stated purpose of the project, which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accommodates subsistence...while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1). The Draft EIS does not consider an alternative that does not permit subsistence ORV use because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22). Approximately 1/2 of the existing ORV use in the analysis area is related to subsistence (see Table 4-1 of the Draft EIS). Section 201(a) of ANILCA states, "Subsistence uses by local residents shall be permitted in the park, where such uses are traditional in accordance with the provisions of Title VIII" (Draft EIS, page 1-7). A purpose of the EIS is to address access for subsistence (Draft EIS, page 1-1). Doing so without trail improvement would result in continued trail degradation and resource impacts, as described in the Draft EIS under Alternative 3. This is summarized in the Draft EIS in section 2.7, page 2-41.
N099-2	Alternative 1 (No Action) is the status quo and certainly not viable under any circumstances as the litigation proved. Alternative 2 (Permit Recreational ORV Use) is not legally viable either under NPS statutes. Recreational ORV and ATV use is not allowed on national park lands and should not be allowed here. Alternative 3 (No Recreational ORV Use Permitted) begins to come closer to where the decision point should be but does not go far enough to address the restoration and trail relocation needs from decades of accumulated trail damage that should be dealt with to allow subsistence access to continue without further damaging the land. Alternative 4 (Improve Trails, Permit Recreational ORV Use in the Preserve) is also unacceptable because of the allowance of recreational ORV and ATV uses. Finally, while also unacceptable, Alternative 5 (Improve Trails, Permit Recreational ORV Use on Improved Trails) is closest to where NPS should be in this decision, but not without specific amendments such as excluding recreational ORV and ATV uses.	Motorized vehicles have been used since before Wrangell-St. Elias National Park and Preserve was established for the purpose of accessing backcountry and wilderness activities (Draft EIS, page 1-7). Not permitting any recreational ORV use, as is proposed under Alternative 3, would not meet the stated purpose for this project, which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accommodates subsistence...while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N099-3	These trails in the tundra create a gash across the land cutting off the normal flow of water borne nutrients across gentle slopes and changing the nature of the biological communities there. This can only be fixed by rerouting these trails to gravel banks along rivers and streams and restoring the damage from the old trails. I have never seen any trail hardening of lasting value put down on tundra.	There are numerous examples around the State of Alaska of trail hardening installed in tundra (or similar) environments. Examples include the Hopson Trail in Barrow (installed in 2004) and the Hooper Bay Trail, in Hooper Bay (installed in 2007). Both of these were pourous pavement panel installations.
N148-3	Appendix G - Wilderness Minimum Requirements Decision Guide, Step 1 0, page G-3, states, "Under the existing conditions, it is the conclusion of the analysis that no unacceptable impacts to wilderness character or impairment are occurring." That was the NPS justification for calling it eligible wilderness, apparently, but should also be the reason why subsistence ORV off-trail use should still be allowed, in all eligible and designated wilderness.	The proposal in Alternative 5 to require subsistence ORV users to stay on improved and designated trails in the Wilderness would address the proliferation of spur trails and impacts to wilderness character.
N148-4	Eligible Wilderness... The easements on the trails seem too narrow on the maps. Areas around the Boomerang Trail and the trailhead of the Tanada trail actually have tiny areas of eligible wilderness effectively surrounded by ineligible. We feel that a larger buffer should be allowed around the trails to minimize the net gain of acreage. Under this proposal, every acre of land in the Nabesna stUdy area which is not an inholding or a trail with its easement is designated as eligible wilderness. Is that realistic with our history of use of the area?	Buffer areas around trails are 1/4 mile and 1/2 mile, depending on the condition of the trail. Areas outside of the trails and buffers met the 1986 criteria for eligible wilderness (see pages A-2 and A-3 of the Draft EIS).
New Alternatives of Elements		
N003-1	To protect the wilderness and rural lifestyle of the area, WRST needs to eliminate the recreational ORVs and have subsistenct users permitted to designated non-wilderness trails.	Alternative 3 of the Draft EIS proposes not permitting any recreational ORV use in the analysis area. However, Alternative 3 does not meet the stated purpose of the project, which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accomodates subsistence...while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1). The Draft EIS does not consider an alternative that does not permit subsistence ORV use because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22).
N003-2	ORV use should only be allowed when the ground is frozen with adequate snow cover to protect Park resources. In our opinion reasonable access would be by foot, horse, floatplane or wheeled aircraft...To provide scenic views of the surrounding mountains for the visiting public raised board walks could be constructed.	The Draft EIS does not consider an alternative that does not permit subsistence ORV use because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22). Raised boardwalks were not considered for non-motorized trails because other more cost-effective construction methods would be used.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N003-3	Trails north of the Nabesna Road would be prioritized for stabilization and hardening. Subsistence ORVs would be restricted to designated and maintained trails	Trails north of the Nabesna Road are considered for stabilization and hardening in Alternatives 4 and 5 of the Draft EIS. Designation of all trails for subsistence ORV use and requiring subsistence ORV users to stay on designated trails is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). However, Alternative 5 of the Draft EIS proposes designation of trails for subsistence ORV use in the wilderness and proposes off-trail monitoring of subsistence use.
N004-1	Public volunteers should be allowed to fix the trail in NPS.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. Some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) would be appropriate for volunteer labor.
N004-2	Aircraft should be allowed in the park.	Airplanes are allowed in the park as well as the preserve for flightseeing, access to inholdings, and drop offs/pick ups to support recreational activities in the backcountry.
N004-3	Adults who grew up hunting in the park and/or preserve should be 'grandfathered' in to still be allowed to hunt and driving ORV in the NPS.	Individuals who reside outside of the park and the resident zone communities, but are rural Alaskans and have (or are members of a family that has) customarily and traditionally used park subsistence resources, may apply to the Park Superintendent for a subsistence eligibility permit, or 13.440 permit (page 3-68, Draft EIS). However, no legal authority exists for issuance of special use permits to non-rural residents living outside the area, even if they have family ties in the area; when recreational ORV use is not permitted on a given trail or area. (Same response for N004-3 and N015-5)
N015-5	We agree with the definition that there are "other traditional hunting/fishing" in the Park and Preserve. This definition refers to those people who have moved to urban areas, but still have customary and traditional ties to the Wrangell St. Elias Park & Preserve. We agree with WRST SRC's comments that these people should be able to get a special use permit to utilize ORVs in the park, if they are out travelling with residents from one of the 23 zone communities, and have customary and traditional ties to the park	
N006-1	To protect the wilderness values and subsistence lifestyle as required by ANILCA, I believe that WRST needs to eliminate recreational ORV use and limit subsistence users to designated trails	Alternative 3 of the Draft EIS considers not permitting any recreational ORV use in the analysis area. Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). However, Alternative 5 of the Draft EIS proposes designation of trails for subsistence ORV use in the wilderness and proposes off-trail monitoring to ensure that impacts associated with off-trail subsistence use do not increase.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N006-2	ORV use should only be allowed when the ground is frozen with adequate snow cover to protect Park resources.	Alternative 3 of the Draft EIS proposes not permitting any recreational ORV use in the analysis area. The Draft EIS does not consider an alternative that only permits subsistence ORV use under frozen conditions because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22).
N007-1	I believe that the documents make it abundantly clear that, given a thoughtful and unfettered interpretation of law and policy, Alternative 3 (No Recreational ORV Use Permitted) is the environmentally preferred alternative and should also be the agency's preferred alternative. It would be even better if, in the final plan, the National Park Service combined Alternative 3 with the trail improvement components of Alternative 5 and a permit system for subsistence ORV use as provided for in the General Management Plan (page 189).	Alternative 3 was not chosen as the environmentally preferred alternative because, while it reduced ORV use in the analysis area, it does little to improve trails. Without trail improvements, some resource impacts associated with subsistence ORV use of unimproved trails are expected to continue (Draft EIS, page 2-41). Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). However, Alternative 5 of the Draft EIS proposes designation of trails for subsistence ORV use in the wilderness and proposes off-trail monitoring of subsistence use.
N008-1	Why don't we improve Reeve Field trail for access of ORVs to allow access to the Nabesna River and then allow up and down river access on the river bed. This would allow you to go south past Nabesna Glacier and north to Stone Creek. Low cost and least amount of harm to the area.	Based on public comment, the NPS developed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. Your suggestion for Reeve Field access to the Nabesna River and extension along the floodplain to the south will be considered in the analysis of the sixth alternative. (Same response for N008-1 and N009-1)
N009-1	Improve Reeve Field trail for ORV access to Nabesna River. Allow ORV access in Nabesna River bed north past Nabesna Glacier and South to Stone Creek.	
N010-8	There need to be more access routes to back country, not less. Only then can the overuse issues be mitigated without trampling on the right of users. No trail should ever be closed without providing an alternative access route.	The Draft EIS considers several alternatives that propose more motorized access than under current conditions. These include Alternatives 2 and 5.
N015-4	Damaged trails should be closed and parts of the trails in good condition should be left open.	The Draft EIS considers several alternatives (3, 4, and 5) that close damaged trails to recreational ORV use and then monitor unimproved trails to ensure that resource impacts do not expand.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N015-7	Recreational ORVs should be banned during the moose and sheep hunting season. Conflicts will arise between customary and traditional use hunters and recreational ORV users. Recreational users out in the field with ORVs will have an adverse impact upon wildlife and will create a potential conflict with C&T hunters. Subsistence use on these trails should always have priority!	Alternative 3 in the Draft EIS would not permit recreational ORV use in the analysis area. Alternatives 4 and 5 propose to improve trails and permit varying degrees of recreational ORV use on improved trails. For both of these alternatives, the Draft EIS concluded that there would be an increase in competition for wildlife resources, but not at a level that would significantly restrict subsistence activities (Draft EIS, page F-7). Within the range of alternatives considered in the Draft EIS, subsistence ORV use is favored over recreational ORV use (for example, no trails are proposed to be closed to subsistence ORV use unless monitoring of unimproved trails shows increased resource impacts over time; whereas the Draft EIS considers not authorizing recreational ORV use in many areas).
N016-4	Build non-motorized trails only in the hard park to help reduce future user conflicts between quiet sport elitists and all other forms of trail use	The range of alternatives considered in the Draft EIS considers varying degrees of non-motorized trail construction, including none under Alternatives 1 and 2. Proposed construction of non-motorized trails in both the park and preserve meets management objectives identified for Visitor Opportunities/Access (page 1-6, Draft EIS) and would likely reduce motorized/non-motorized conflict on shared trails in the area (page 4-168, Draft EIS).
N016-6	All trail users in the Preserve can pay fees to help keep the trails they use in maintainable condition	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N016-7	AOC recommends removing the 1986 wilderness eligible areas from the Preserve. Wilderness designated areas block opportunity for the majority of people to access public lands. Designated Wilderness and Eligible Wilderness areas within the WRST Preserve do not meet the Minimum Requirement Decision Guide (MRDG) necessary for wilderness administration due to ORV use, DEIS, Appendix G. The loss of wilderness designated lands in the WRST Preserve need not diminish the natural, aesthetic, or scenic values of the 13.2 million acre conservation system unit. Not all 13.2 million acres of WRST Park and Preserve need to meet the wilderness requirement of a place of "solitude or primitive and unconfined recreation quality" in order for the Service to achieve its goals for the Park unit. The change to ineligible status will increase opportunities for other WRST Preserve users not just seeking "pure wilderness" values. The hard Park still has plenty of area that does meet the MRDG standard. Inholders, federally qualified subsistence users, hunters and recreational riders also appreciate the opportunity to have reasonable access to public resources.	The adjustment to eligible wilderness proposed in Chapter 2 of the Draft EIS is done, in part, to correct 1986 mapping inadequacies associated with motorized trail corridors that existed prior to 1986 (see Draft EIS, page 2-2). It is not intended as a full wilderness suitability study.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N017-5	While excessive airplane use is clearly antithetical to the wilderness experience (for example, flightseeing traffic can be a significant problem in this regard), occasional flyovers by air taxis transporting recreationists who are willing to use their arms (boating) or legs to get around once they're dropped off are rarely a problem. If such flyovers do become a problem, limits can and should be placed on them.	The scope of the Draft EIS is ORV use within the identified analysis area (Draft EIS, page 1-1). Effects of airplanes are discussed as cumulative impacts under the Wilderness and Natural Soundscapes impact topics in Chapter 4. However, no limits on airplane use are considered within the range of alternatives in the Draft EIS because it is outside the scope of this EIS.
N017-6	We recommend— with two important exceptions— that the proposals for trail improvements in Alternative 5 also be included in a revised Alternative 3...The two exceptions are the proposed blading of the Trail and Lost Creek trails. Both of these trails have relatively little evidence of non-primitive types of recreation or of mechanization. In spite of the ORV use, the recreational experience still has a largely natural feel, since on the graveled portions of the trail even the exact route is often not apparent and the hiker is able to do his or her own minor route finding. Blading would inject an obtrusive scar and a totally unnecessary artificiality into the experience, and might not in any case survive the not unusual flooding of these creeks.	The Final EIS analyzes an alternative that combines elements of Alternatives 4 and 5 presented in the Draft EIS. It proposes to fix all trails, then permit recreational ORV use on improved trails in the preserve, not the park. Location, marking, and possible clearing of alternate trail locations for Trail and Lost Creeks is proposed for two reasons: 1) to minimize the numerous stream crossings currently required; and 2) to provide a means to access for mechanical construction and reconstruction of motorized and non-motorized trails, including the Soda Lake re-route and portions of the Mentasta traverse non-motorized trail.
N017-7	We recommend that Alternative 3 include the provision in Alternative 5 that in designated Wilderness such use be on the designated trails only; that is, off-trail use would be prohibited. But we believe that such a provision should be applied to all ORV use, including therefore such use outside of designated Wilderness.	As explained in the response to comment #N017-6, the Final EIS analyzes an alternative that combines elements of alternatives 4 and 5 presented in the Draft EIS. Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). However, Alternative 5 of the Draft EIS proposes designation of trails for subsistence ORV use in the wilderness and proposes off-trail monitoring to ensure that impacts associated with off-trail subsistence use do not increase.
N017-11	Since it makes sense to balance the number of motorized trails with at least an approximately equal number of non-motorized trails and routes, we recommend that in this regard the provisions of Alternative 5, which includes the largest number of new non-motorized opportunities, be included in Alternative 3.	The Final EIS analyzes an alternative that combines elements of alternatives 4 and 5 presented in the Draft EIS. It includes all the non-motorized trails and routes included in the Draft EIS Alternative 5.
N022-1	I support Alternative #3, with additions from Alternative 5, which I believe will best uphold the intent and purpose of the National Park and Preserve. Specifically, I support: No recreational off-road vehicle use in our national park and preserve. This will result in fewer impacts to our National Park resources including wildlife, wilderness and wetlands. Requiring subsistence ORV users in Wilderness and wetlands to stay on designated trails and managing subsistence ORV use so that resources impacts decrease over time. Resolving user conflict and improving backcountry access by creating hiking trails for park visitors to experience the wonders of our largest national park – adopt the non-motorized trail package presented in Alternative #5.	The Final EIS includes Alternative 3 and it analyzes an alternative that combines elements of alternatives 4 and 5 from the Draft EIS. The sixth alternative proposes to fix trails, then permit recreational ORV on improved trails in the preserve; construct non-motorized trails and routes; designate trails for subsistence ORV use in the wilderness; and monitor off-trail use resulting from subsistence ORV use. Designation of all trails for subsistence ORV use and requiring subsistence users to stay on those designated trails is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). (Same response for N022-1, N025-1, and N032-1)

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N025-1	I write to urge you to support Alternative #3 in the draft Nabesna Off-Road Vehicle (ORV) Trails Management Plan...Specifically, I support: No recreational off-road vehicle use in our national park and preserve. This will result in fewer impacts to our National Park resources including wildlife, wilderness and wetlands. Requiring subsistence ORV users in Wilderness and wetlands to stay on designated trails and managing subsistence ORV use so that resources impacts decrease over time.	
N032-1	Therefore, we support Alternative #3, with some modification: We do not support any off-road vehicle use in the National Park. In the Preserve, subsistence ORV use must remain on designated trails to protect natural resources, particularly wetlands and wilderness values. Manage subsistence ORV use carefully to reduce impacts to fragile ecosystems. Develop a plan for backcountry oversight and management. Develop a non-motorized use plan to prevent user conflicts. Create non-motorized hiking trails	
N029-1	Most, if not all, recreational access to the park should be via the traditional and less-damaging, methods of snow machine, aircraft, boat, foot and horse	Alternative 3 of the Draft EIS would not permit any recreational ORV use in the analysis area.
N035-3	I also support access by horse without requiring manure catchment bags. Horses have been in use in this area since at least the 1930's (probably earlier) and their manure has in no way damaged the terrain. In fact it in can be argued that their manure benefits the environment by recycling soil nutrients back into the environment.	The Draft EIS does not consider any alternative that limits horseback use, on unimproved or improved trails.
N044-1	I feel that subsistence use should not be curtailed in any way by this EIS. Although I commend WRST's proposal to improve ALL the ORV trails to a manageable condition, I do not agree that subsistence use be restricted to only include these trails. It is my understanding that off-trail use in the designated wilderness is now allowed but would be forbidden in this preferred Alternative in the Nabesna district. Therefore, I ask WRST to delete the language that restricts subsistence use to trails in "designated wilderness."	The proposal in Alternative 5 to limit subsistence ORV use to improved and designated trails is intended to minimize proliferation of ORV trails and impacts to designated wilderness. The Draft EIS considers four other alternatives that do not impose any restrictions on subsistence ORV use, other than monitoring of unimproved trails (considered in Alternatives 3, 4, and 5). (Same response for N044-1 and N044-3)
N044-3	I support Alternative 5 with a few suggested modifications Remove all language which restricts subsistence or inholder use, Remove all language which restricts subsistence or in holder use, inflates estimates of future use, or closes trails without less restrictive management action tried first.	
N044-2	I support Alternative 5 with a few suggested modifications I ask that you "not increase the amount of eligible wilderness	The adjustment to eligible wilderness proposed in Chapter 2 of the Draft EIS is done, in part, to correct 1986 mapping inadequacies associated with motorized trail corridors that existed prior to 1986 (see Draft EIS, page 2-2). Proposed adjustments were made based on an objective re-classification using criteria that was used in 1986. Consequently, there are no alternative options. We either adopt the eligibility adjustments (under Alternatives 2, 3, 4, and 5) or we don't (Alternative 1).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N047-1	It is reasonable that trail hardening be done and that users not be allowed to recklessly damage terrain but extremism in regulation is unacceptable. Users should be allowed to self-help and reasonably help maintain trails.	Alternative 5, identified as the preferred alternative in the Draft EIS, proposes to improve existing trails, allow recreational ORV use on all improved trails, and continue to allow subsistence ORV on and off most trails (improved or unimproved).
N048-1	I am not sure hiking trails are really necessary either as that country has been traveled from one end to the other since before the railroad days with amazing populations of people living in the area and you don't see much trace of that today. Visitors can see the park with no impact by just taking off walking in any direction at any time. I have heard visitors say they have come here to see the wilderness and are a bit shocked and disappointed to find we are trying to make it like every other state with our treated wood walkways, hydro axed roadways, etc. which are another form of pollution and impact.	Visitor surveys have shown that many park visitors support construction of non-motorized trails (Draft EIS, page 3-86). Proposed construction of non-motorized trails fulfills a part of the purpose and need of this EIS/Plan, stated as "There is a need to consider other recreational opportunities and address user conflicts" (Draft EIS, page 1-5).
N058-2	Also, do not close the trail to Tanada Lake the longest lake on Nabesna Road. A suggestion would be to allow volunteers to work on trails to help the process.	Alternatives 4 and 5 of the Draft EIS both propose to fix the Tanada Lake trail and allow some motorized use. The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. Some components of the work will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.
N059-1	The plan must require that ORV users stay on designated trails which must not pass through existing wilderness or potential wilderness designation areas	In all alternatives considered in the Draft EIS, recreational ORV users (if permitted) would be required to stay on designated trails and would not be permitted in the wilderness (page 2-7, Draft EIS). The Draft EIS does not consider an alternative that does not permit subsistence ORV use in wilderness because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22).
N059-2	In accordance with ANILCA, the NPS must determine which of the estimated 6,000 residents living near the park are legitimate subsistence users and which are not	Eligibility requirements to use the park/preserve for subsistence activities are described on page 3-68 of the Draft EIS. Changing the regulations regarding subsistence eligibility is beyond the scope of this EIS (Draft EIS, page 1-15).
N060-3	Charge all of us a nominal fee to utilize these designated trails	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N062-1	There is a ridge to east of the trailhead (tanada lake) why couldn't they have put the trail up there?	Alternative 4 of the Draft EIS and Alternative 6 of the Final EIS propose a re-route for the Tanada Lake trail that would utilize that ridge (Sugarloaf).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N064-1	Subsistence users will be permitted on six designated non-wilderness "hardened" and maintained trails in the Preserve area north of the Nabesna Road.	Designation of these six trails for subsistence ORV use and requiring subsistence users to stay on those designated trails is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS).
N064-3	Close three ORV impaired trails south of the Nabesna Road (Copper, Tanada and Boomerang Trails) to protect wetlands, permafrost and subarctic wildlife habitat.	The three trails mentioned in your comment, until improved, would be closed to recreational ORV use under alternatives 1, 3, 4, and 5 of the Draft EIS. They are not considered for immediate closure to subsistence use in the range of alternatives because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22). Alternatives 3, 4, and 5 propose monitoring of unimproved trails, and Alternatives 4 and 5 propose improvement of the trails. (Same response for N064-3 and N069-2)
N069-2	The park should close three ORV impaired trails south of the Nabesna Road (Tanada, Copper and Boomerang Trails) to protect wetlands, vegetation, permafrost and subarctic wildlife habitat.	
N064-4	Designated Park/Preserve Wilderness should not be changed to allow for additional trails in the Nabesna area.	None of the alternatives in the Draft EIS propose to change designated wilderness boundaries.
N068-8	Another topic that should have received attention but is not mentioned at all would be low-pressure tires for ORV....Management of trails by managing the kinds of tires that are used on the trail at least is more pro active.	The use of low pressure tires will be added to Table 2-3 (page 2-21 of the Draft EIS) as a management tool under "Vehicle Class Restrictions".
N069-1	To protect the wild and undeveloped character of the public lands, WRST needs to eliminate the recreational ORVs and have local subsistence users permitted to designated non wilderness maintained trails in the preserve.	Designation of these six trails for subsistence ORV use and requiring subsistence users to stay on those designated trails is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). In addition, Alternative 3 of the Draft EIS would not permit recreational ORV use in the analysis area.
N072-2	We support Alternative 4, with some modifications, as our legally and environmentally preferred alternative. Specifically, we support the following: No recreational ORV use permitted on lands designated as National Park. Recreational ORV use may be allowed on lands designated as National Preserve provided that the use is restricted to designated, sustainable trails and in accordance with 36 CFR 4.10. Reasonable and appropriate access for ORVs on sustainable trails for legitimate purposes, such as access to private property and subsistence activities by qualified subsistence users. Re-route the Tanada Lake Trail outside of wetlands. The plan's proposed Wilderness Eligibility Revision.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. It would improve all nine trails to a maintainable condition, then permit recreational ORV use on improved and designated trails in the preserve. It would re-route the Tanada Lake trail out of wetlands, designate trails for subsistence ORV users in the Wilderness, adopt the proposed Wilderness Eligibility Revision, and adopt monitoring standards/management actions for subsistence ORV off-trail use. It also includes all proposed non-motorized trails and routes proposed in the Draft EIS Alternatives 4 and 5. (Same response for N072-2, N072-3, N072-10, N072-29, and N072-54).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-3	In addition, there are aspects of other alternatives that we support and would like to see included in the final Record of Decision: The specific "Subsistence ORV Use" language proposed in Alternative 5, including the requirement that subsistence ORV riders in Wilderness must stay on designated trails and routes. Include the non-motorized trail package presented in Alternative 5 to reduce user conflict and create hiking opportunities for adventurous park visitors to enjoy a spectacular wilderness experience in our largest national park.	
N072-10	Additionally, Alternative 5 speaks to a desired outcome of monitoring and managing subsistence ORV use so that resources impacts "decrease over time." This goal does not exist in Alternative 4 and we support it.	
N072-29	The standards and range of management tools available to park managers, as found in tables 2-2, 2-3, 2-4 and 2-5 all include Alternative 4. However, the Off-trail ORV use standards and indicators found in Table 2-6 (page 2-40) and in Appendix B are somehow only limited to Alternative 5. Since subsistence ORV use is not limited to just Alternative 5, we are little perplexed why this set of standards and indicators is not broadly applied to all alternatives with subsistence ORV riding. We support applying this Table to all other alternatives, including our preferred Alternative 4, and request that it be included in the Final EIS and Record of Decision.	
N072-54	We are concerned that Alternative 5 hardens the Tanada Lake trail in place through extensively degraded wetlands rather than relocating it to a more appropriate and sustainable location outside of wetlands, thereby allowing for recovery of heavily degraded sections.	
N072-4	And there are several actions supported by the Draft EIS but not specifically proposed that we would like to see incorporated into the final Record of Decision: Follow the example set in Denali National Park at Cantwell that limits subsistence ORV use to designated trails or routes. In the final Wrangell-St. Elias plan, we'd like to see subsistence ORV riding limited to designated trails or routes in non-wilderness wetlands. Explore options to allow for immediate family members living outside the region who are related to qualified subsistence users to operate ORVs while accompanying their host in traditional subsistence activities.	Alternatives 4 and 5 of the Draft EIS would close old degraded trail corridors to all ORV use once trails are improved or re-routed (See, for example, descriptions of proposed trail improvements for Copper Lake and Tanada Lake trails under Alternative 5, pp. 2-30 and 2-37, Draft EIS). Alternative 5 in the Draft EIS proposes off-trail monitoring for subsistence ORV users that would minimize resource impacts. The Final EIS will include a sixth alternative that will include both of these provisions. Individuals who reside outside of the park and the resident zone communities, but are rural Alaskans and have (or are members of a family that has) customarily and traditionally used park subsistence resources, may apply to the Park Superintendent for a subsistence eligibility permit, or 13.44 permit (page 3-68, Draft EIS). However, NPS could find no legal authority for issuance of special use permits to non-rural residents living outside the area, even if they have family ties in the area; when recreational ORV use is not permitted on a given trail or area.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-8	With this Cantwell example in mind, and given Alternative 5's desire to limit subsistence riding to trails in Wilderness, we propose NPS adopt an additional standard on non-wilderness lands restricting subsistence ORVs to trails and routes when in a wetland environment.	Closing old degraded trails to all ORV use and monitoring off-trail use will accomplish the same thing. The Draft EIS concludes, for Alternative 5, that impacts to wetlands would be minor (p. 4-51, Draft EIS). (Same response for N072-8 and N072-9).
N072-9	We strongly encourage the Park Service to use the findings of this DEIS to stipulate that all forms of legitimate ORV use be restricted to identified trails or routes when in wetlands.	
N072-11	In effect, there is a displacement of a relatively small number of individuals who may have historically used ORVs as a mode of access to accompany their families in traditional subsistence activities. We are sympathetic to the desire of local qualified subsistence users to have immediate family members who no longer live in the region accompany them in their subsistence activities and be allowed to drive ORVs in the process.	Individuals who reside outside of the park and the resident zone communities, but are rural Alaskans and have (or are members of a family that has) customarily and traditionally used park subsistence resources, may apply to the Park Superintendent for a subsistence eligibility permit, or 13.440 permit (page 3-68, Draft EIS). However, no legal authority exists for issuance of special use permits to non-rural residents living outside the area, even if they have family ties in the area; when recreational ORV use is not permitted on a given trail or area. (Same response for N072-11 and N072-12).
N072-12	We strongly encourage the Park Service to find a solution, possibly by issuing some kind of special use permit that allows family members living outside the region to operate ORVs while accompanying authorized subsistence users. In determining who would be eligible for such a permit, we would point to the Slana area residents' suggestion of looking to the second degree of kinship rules used by the Alaska Department of Fish & Game.	
N072-19	We are concerned that the Suslota trail is one of the most degraded trails in the park, yet there are no plans in Alternative 4 to improve this trail. Use is described as "light" (page 3-10) but in Table 3-5, the number of round trips on Suslota (60) is approximately the same as for Tanada Lake (65) and is more than any other trail in the Park or Preserve except Copper Lake (105). We encourage the NPS to include at least the improvements suggested in Alternative 5 for this trail, although it may be a lower priority than other trails.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. Under this alternative, the Suslota trail will be improved to a maintainable condition. After improvement, the trail would be open for both recreational and subsistence ORV use.
N072-20	We support the re-alignment of Reeve Field Trail. This seems to be a doable project that won't require a significant investment. We understand there is some concern about the terminus of this trail being on an easement surrounded by private property and that local trail users have suggested an innovative solution, which we support, to extend access along the flood plain south to the confluence of the Nabesna River and Jacksina Creek and north to the confluence of the Nabesna River and Jack Creek. Should ORV riders need to access the surrounding flood plain to stay away from private property, we would be open to that option. Particularly given that the flood plain is scoured each year by winter ice and spring break-up, thus erasing any evidence of a permanent trail.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. Your suggestion for Reeve Field access to the Nabesna River and extension along the floodplain has been incorporated into the sixth alternative.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-32	We recommend that the NPS determine what a sustainable level of use (i.e., carrying capacity) might be for ORVs on unimproved trails under adverse condition in order to manage for desired outcomes, mitigate long-term trail deterioration and minimize taxpayer expense to manage and maintain a remote, motorized trail system for subsistence in our national park.	Table 2-2 and 2-3 in the Draft EIS (page 2-21) display monitoring standards and indicators and management tools for unimproved trails that would be implemented under alternatives 3, 4, or 5 of the Draft EIS. If standards are exceeded, Table 2-3 presents a range of management options including vehicle class restrictions, reduction of use, and closures that could limit subsistence ORV use.
N072	We recommend that the NPS determine the carrying capacity for its improved trails so that a sustainable level of use is defined and available as a management tool when needed to implement reductions in use when appropriate.	Tables 2-4 and 2-5 in the Draft EIS (page 2-29) display monitoring standards and indicators and management tools for improved trails. These standards and indicators establish a physical "carrying capacity" for the improved trails.
N072-38	We would like to see the Monitoring Indicators and Standards for Unimproved Trails in described in Alternative 3 and as modified above applied to all alternatives.	The monitoring indicators and standards for unimproved trails are proposed for Alternatives 3, 4, and 5 in the Draft EIS. They do not apply to Alternative 1 because it is the No Action alternative.
N072-39	We believe that developing a baseline map for detecting new trails, as indicated under Alternative 5, is a critical component of monitoring ORV trails under all alternatives.	We agree.
N072-53	We would ask that the Park Service include in their finding limits on recreational use and strict standards for riding behavior to avoid adverse impacts to park resources and subsistence users.	The preferred alternative addresses limitations on recreational ORV use.
N073-15	A tool that should be considered when limiting use is to restrict use by those classes of vehicles that cause the greatest impact. For example, we suggest looking at classes based on weight or ground pressure.	Vehicle weight, ground pressure, and tire pressure would all be factors taken into consideration in determining Vehicle Class Restrictions (identified as a possible management action in response to unimproved trail monitoring, Table 2-3, page 2-21, Draft EIS).
N073-17	We oppose designation of trails in designated Wilderness combined with a requirement that subsistence ORV users must stay on those trails. Subsistence users need to be able to use ORVs off trail to retrieve harvested animals as well as to access wildlife located far off the trails. The proposed monitoring standards would ensure that new trails are not created.	Alternative 5 of the Draft EIS proposes this restriction in order to limit the proliferation of ORV trails in Wilderness. The ANILCA Section 810(a) Summary Evaluation and Findings concluded (under The effect on subsistence access) that "Although the restrictions on subsistence ORV use in wilderness would reduce the area where subsistence users could take their ORVs, the overall impact of this (alternative) would be improved access for subsistence users" (Draft EIS, pageF-6). A sixth alternative analyzed in the Final EIS proposes designating trails with an allowance for game retrieval.
N073-18	Aircraft as a means of subsistence access: The use of aircraft should be authorized to access the National Park for the purpose of taking fish and wildlife for subsistence. This is a management tool that would lessen use of trails and thereby the trail impacts. Aircraft are a traditional means of access for subsistence in Wrangell-St. Elias, and their use should be allowed. Section 811(a) of ANILCA states that "the Secretary shall ensure that rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on the public lands." We are not suggesting the establishment of new airstrips, simply allowing this traditional means of access to be used.	Please see response to comment #N004-2.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N073-20	Opportunities for education: Education can play an important role in reducing opportunities for user conflict. It is important for non motorized/non consumptive trail users to be aware of the history of and allowances for motorized and consumptive uses. And a code of ethics for subsistence users should be publicized	We agree that education has a role in addressing user conflict.
N073-27	Federally qualified subsistence users should be able to obtain a permit that would allow family members who do not live in the local area to accompany them on trips into places that are otherwise not open to motorized use by non-local residents. This will help preserve the connection with the land for family members who have had to leave the area for reasons such as employment and thereby promote resource stewardship.	Individuals who reside outside of the park and the resident zone communities, but are rural Alaskans and have (or are members of a family that has) customarily and traditionally used park subsistence resources, may apply to the Park Superintendent for a subsistence eligibility permit, or 13.440 permit (page 3-68, Draft EIS). However, no legal authority exists for issuance of special use permits to non-rural residents living outside the area, even if they have family ties in the area; when recreational ORV use is not permitted on a given trail or area. (Same response for N073-27, N075-2, and N075-3.)
N075-2	We propose that the National Park Service create a Special Use Permit strictly to be issued in the case of federally qualified subsistence users with family members who wish to operate ORVs in the National Park as well as the Preserve. There would be no cost for these permits. These family members would otherwise be "recreational" operators as described above. Federally qualified subsistence users would "host" these family members. Permittees would be required to be in the company of the federally qualified subsistence host named on their permit and could operator an ORV in any area accessed by the host.	
N075-3	We suggest using the 2nd degree of kinship rule which is the same method used by the Alaska Department of Fish and Game to determine who must have hunting guides for some big game species	
N075-4	We support the realignment of Reeve Trail but find that it is problematic for recreational and subsistence ORV operators who reach the end of the trail on an easement and surrounded by private property. People using the trail to access float trips on the Nabesna River may find themselves far from the river depending on where the channel is from year to year. Since the trail ends at the Nabesna River floodplain, access should be extended to the floodplain south to the confluence of the Nabesna River and Jacksina Creek and north to the confluence of Nabesna River and Jack Creek. Any tracks left in the flood plain will be erased by the ice sheet which covers most of the floodplain each winter and by breakup in the spring. This would provide all ORV operators with a unique access opportunity and protect the rights of private land owners with little risk of permanent damage to resources.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. Your suggestion for Reeve Field access to the Nabesna River and extension along the floodplain has been incorporated into the sixth alternative.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-5	We support the Tanada Lake reroute and realignment. However, we find that the trail description and maps include no constructed motorized access to the lake. This is problematic for two reasons. First, for many people accessing the lake in the summer, the purpose is to fish. If they are bringing in camps and families, they will want to be closer to the lake than the described route travels. It appears that the route will stay between one and two miles from the lake. While we note that there is a constructed nonmotorized trail spur from the ORV trail to the north end of the lake, an additional constructed motorized trail with access to the southern portion of the lake would give operators an option to reach the lake with their ORVs and avoid any damage to wetlands and the lake shoreline. Secondly, the described non-motorized trail passes along side the northern property line of an 80 acre native allotment. Placing a second constructed access route to the south of the lake will spread out usage and protect the rights of private property owners.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. It would improve all nine trails to a maintainable condition, then permit recreational ORV use on improved and designated trails in the preserve. It would re-route the Tanada Lake trail out of wetlands, designate trails for subsistence ORV users in the Wilderness, adopt the proposed Wilderness Eligibility Revision, and adopt monitoring standards/management actions for subsistence ORV off-trail use. It also includes all proposed non-motorized trails and routes proposed in the Draft EIS Alternatives 4 and 5. In the sixth alternative in the Final EIS, the Tanada Spur Trail will be proposed and analyzed as a motorized trail.
N075-17	All of the concerns raised for impacts caused by increased use in Alt 4 could be addressed by an aggressive education program and an increase in community involvement in management and maintenance of the trails.	We agree that an education program is one of the tools that can be used to accomplish resource protection objectives. WRST is interested in increasing the level of community involvement in management and maintenance of the trails in the area.
N075-24	The use of volunteers for trail maintenance needs to be explicitly written into the EIS.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. Some components of the work will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.
N076-1	SVIA generally supports the NPS's preferred alternative, Alternative 5, with two significant exceptions - the NPS should (1) provide for managed use of the trails by recreational ORVs before trail improvements are started or completed, rather than completely closing the trails until trail improvements are finished; and (2) include a commitment to pursue funding for trail improvements. SVIA supports these changes to Alternative 5 because, while SVIA agrees that trail improvements should be made and the trails should be open to recreational ORV use after the improvements are made, trail improvements are dependent on funding. Under the current Alternative 5, a lack of funding would result in the trails being closed indefinitely to recreational ORV use. This would create an incentive for ORV opponents to block needed funding as a means of preventing reasonable access.	Alternative 5 of the Draft EIS states that recreational ORV use would be permitted, prior to trail improvement on designated trails in fair or better condition. To continue to permit recreational ORV use on unimproved and degraded trails would be inconsistent with NPS policy and Executive Order 11644. Recreational ORV use on unimproved trails, as documented in the Draft EIS, would lead to "adverse impacts on the area's natural, cultural, scenic, and esthetic values". NPS would not consider permitting recreational ORV use on existing degraded trails under 43 CFR 36.11(g)(2), based on the analysis in the Draft EIS, which concludes that recreational and subsistence ORV use on unimproved trails would lead to major impacts to soils, vegetation, and wetlands. In response to point #2, we hope the trail repairs would rate high in the NPS budget system because they protect resources. (Same response for N076-1, N076-4, N076-5, N076-7, and N076-19.)
N076-4	Furthermore, as previously noted NPS should consider dispersed use as an alternative management to be employed prior to trail improvements. By allowing recreational ORVs throughout the study area pending trail improvements, the NPS could ensure that impacts would be less severe across a broader area than restricting recreational ORVs to trails, where the impacts would be more severe and concentrated.	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N076-5	The NPS's final environmental impact statement should examine dispersed use as alternative management prescription to be used rather than simply to prohibiting recreational ORV use pending trail improvements.	
N076-7	SVIA agrees with the preferred alternative's long term recreational ORV management strategy, but urges NPS to explicitly recognize that it possesses sufficient regulatory tools to manage continued recreational ORV usage pending completion of trail improvements. Accordingly, SVIA encourages the NPS to consider, and ultimately adopt, such a modification to its preferred alternative.	
N076-19	The SVIA generally supports Alternative 5, the preferred alternative, to the extent it provides for trail improvements and maintenance and reasonable levels of recreational ORV use on trails in the Park and Preserve. However, the NPS should modify Alternative 5 to allow for continued recreational ORV use pending trail improvements, should make a commitment to diligently pursue funding for trail improvements, and, to the extent possible, should provide for recreational ORV access while trail improvements are being made.	
N077-1	In summary, we recommend adoption of Alternative 5 as strengthened by the following provisions: NPS review of the population composition of the WSE subsistence resident zone communities. NPS determination of traditional subsistence use areas and non-subsistence use areas in the park. All trails closed to recreational ORV use. Mandatory permits for subsistence ORV use, with users required to stay on designated trails.	NPS and Federal subsistence regulations and eligibility requirements are outside the scope of this planning document (Draft EIS, page 1-15). No authorization of recreational ORV use is considered and analyzed under Alternative 3 of the Draft EIS. Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS).
N077-6	We recommend that Alternative 5 be amended to include Alternative 3's closure of all trails to recreational ORVs.	Combining the alternatives as suggested would result in not meeting the project's purpose which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities..." (Draft EIS, page 1-1).
N077-7	We fully support Alternative 5's restriction on subsistence ORVs in designated wilderness, but letting the ORVs roam unrestricted in the non-wilderness park and preserve areas of the analysis area is not acceptable. As documented in the DEIS, off-trail travel can impair park and preserve resources and values the proposed plan is presumably intended to safeguard, including impairment of areas eligible for future wilderness designation.	Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS). (Same response for N077-7 and N077-8)
N077-8	In Sec. 811(a) of ANILCA, subsistence ORV use is "subject to reasonable regulation." We believe that requiring permits for subsistence ORV use and requiring ORV users to stay on designated trails is consistent with "reasonable regulation," and recommend that Alternative 5 include these provisions.	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N078-21	In fact, we recommend excluding more of the general area from eligible wilderness based on the recognized historical and current motorized use to enhance management continuity	The adjustment to eligible wilderness proposed in Chapter 2 of the Draft EIS is done, in part, to correct 1986 mapping inadequacies associated with motorized trail corridors that existed prior to 1986 (see Draft EIS, page 2-2). The proposed revision is based on an objective re-application of the eligibility criteria that was used in 1986 (listed on page A-2 of the Draft EIS).
N078-25	Closing lands to subsistence access would preclude activities such as game retrieval. It is not clear why the monitoring standards and management tools described in the DEIS could not also be effective in addressing potential impacts in designated wilderness. Given the very limited areas and the importance of subsistence activities to rural residents, we recommend permitting off-trail ORV use in designated wilderness, subject to monitoring and restrictions as necessary to protect resources	Based in part on public comment, the Final EIS evaluates a sixth alternative. Under the sixth alternative, subsistence ORV users would be required to stay on improved and designated trails in the Wilderness, with allowance for game retrieval.
N078-29	The minimum requirement analysis (MRA) in this DEIS is both premature and inaccurate. First, it is premature to evaluate the full range of alternatives as an "administrative action" before the NEPA process is complete and a properly vetted alternative is selected. The impacts to wilderness are considered within the context of the EIS, along with other considerations and mandates that affect the entire planning area, not just designated wilderness. Second, using an MRA to determine which alternative is considered the "minimum tool" is a misapplication of the MRA process. The minimum tool (step 2) is not a method for determining which alternative has the least impact on designated wilderness. It is the method used to determine how a "necessary" administrative action (step 1—the selected alternative) is to be implemented to have the least impact on wilderness character, while still providing for completion of the project. We therefore request the MRA be removed from the EIS and appropriately deferred to the implementation phase (or phases) of the selected alternative.	NPS policy requires that all management decisions affecting wilderness must be consistent with the minimum requirement concept (Management Policies 2006, Section 6.3.5). It is not premature to examine which of the alternatives considered would have the least impact on wilderness.
N079-10	Establish a permitting system so that sponsored relatives of the subsistence user can personally accompany the subsistence user in the field during subsistence hunting, gathering, and other activities	Individuals who reside outside of the park and the resident zone communities, but are rural Alaskans and have (or are members of a family that has) customarily and traditionally used park subsistence resources, may apply to the Park Superintendent for a subsistence eligibility permit, or 13.440 permit (page 3-68, Draft EIS). However, no legal authority exists for issuance of special use permits to non-rural residents living outside the area, even if they have family ties in the area; when recreational ORV use is not permitted on a given trail or area.
N080-2	The Commission has submitted a request to our Congressional delegation to pursue legislation to restore the ANILCA Section 1308 Local Hire Program. If this can be accomplished, we strongly encourage the NPS to utilize this program to hire local residents for trail construction and maintenance	The NPS supports the 1308 Local Hire Program. For the 2010 summer season, 8 of the 8 individuals hired to work on the trail crew were from the Copper Basin. Local hire makes sense in terms of knowledge of local conditions and cutting housing costs.

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Letter ID - Comment ID	Substantive Comment	NPS Response
N080-4	The preferred alternative proposes to classify a one half mile wide corridor along 9 trails as ineligible for wilderness designation. We would suggest that a more workable solution would be to classify the general area as ineligible. This would recognize the longstanding motorized use of the area and reduce potential conflicts with other park and preserve visitors engaged in activities not supported by visitor uses	The adjustment to eligible wilderness proposed in Chapter 2 of the Draft EIS is done, in part, to correct 1986 mapping inadequacies associated with motorized trail corridors that existed prior to 1986 (see Draft EIS, page 2-2). It is not intended as a full wilderness suitability study.
N081-1	First, managed use of ORVs for subsistence should continue, and the majority of Alternative 5's subsistence provisions should be included in Alternative 3, including the requirement that ORVs must remain on designated trails in designated Wilderness; that is, off-trail use would be prohibited there. However, such a provision should apply to non-Wilderness lands as well, as NPS proposes for sport hunters. Harvesting and transporting game will continue to be entirely feasible without off-trail travel	Designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS).
N081-2	With a couple of important exceptions, the trail improvement provisions of Alternative 5 should be included in Alternative 3. If, however, there is not adequate monitoring and enforcement, the result of trail improvements might be an increase in spur trails and in extensions of existing trails	Alternative 3 is not identified as the preferred alternative in the Draft EIS because it does not accomplish the stated project purpose which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities..." (Draft EIS, page 1-1). (Same response for N081-2 and N081-13)
N081-13	Prohibiting recreational ORV use in units of the National Park System is an obvious way to reduce non-essential noises and help restore the natural soundscape. It is very disappointing, therefore, to see the Service fail to propose taking this step at WRST; we urge it to make this common sense change to its preferred alternative	
N081-3	The two proposed trail improvement projects that should not be undertaken are the blading of the Trail and Lost Creeks trails. These two trails are probably the least degraded of the trails being analyzed, and do not really need "improvement" to reduce the likelihood of further degradation. Additionally, their appearance in most places is still largely natural (that is, the evidence of motorized use is minimal), and blading would destroy this general appearance of naturalness. Furthermore, the frequent flooding of the creeks is likely to erase the blading work in any case	Location, marking, and possible clearing of alternate trail locations for Trail and Lost Creeks is proposed for two reasons: 1) to minimize the numerous stream crossings currently required; and 2) to provide a means to access for mechanical construction and reconstruction of motorized and non-motorized trails, including the Soda Lake re-route and portions of the Mentasta traverse non-motorized trail.
N081-4	Finally, since high quality non-motorized recreational opportunities are quite limited in the planning area (4-160), rather than favored and emphasized as they should be in units of the National Park system, the proposed new non-motorized trails and routes recommended in Alternative 5 (the alternative that proposes the most such new opportunities) should be included in Alternative 3	Alternative 3 is not identified as the preferred alternative in the Draft EIS because it does not accomplish the stated project purpose which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities..." (Draft EIS, page 1-1). Based on public comment, the Final EIS analyzes a sixth alternative, which includes all the proposed non-motorized trails and routes from Alternative 5 of the Draft EIS.
N081-16	At the very least, a non-motorized project should be undertaken for each motorized project that is implemented	Trail improvement or construction projects were proposed within the range of alternatives in the Draft EIS to accomplish management objectives, including, first and foremost, protection of resources, followed by providing for a diversity of recreational experiences.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N082-3	To prevent further damage from recreational ORVs in the national preserve, we urge you to set strict numerical limits on the number of vehicles allowed, in line with the capability of the land to recover from their impacts. NPS has used such limits effectively with backcountry camping, river-running (e.g., Grand Canyon, Dinosaur) and ORVs (Cape Cod, Assateague).	Tables 2-4 and 2-5 in the Draft EIS (page 2-29) display monitoring standards and indicators and management tools for improved trails. These standards and indicators establish a physical "carrying capacity" for the improved trails.
N084-4	For instance, if the "monitoring" action statement found in Alternative #3 was combined with the idea that "...until improvements are completed (...for any and all trails), recreational ORV use would be permitted (in the preserve) only on trails (...determined by management monitoring) in fair or better condition classes, as is stated in Alternative #4. Such a revised compromise meets mandates or guidance found in ANILCA and in the GMP, and more importantly provides the NPS with the management structure and action descriptions from which they can first protect all of the park's resources and systems and second provide for their use and enjoyment.	The monitoring standards and indicators/management actions for unimproved trails proposed under alternative 3 of the Draft EIS is also proposed for Alternatives 4 and 5.
N090-1	Some possible alternatives to closing several trails would be to alternate which trails are open and closed.	Alternating closures as suggested, particularly on unimproved trails, would concentrate more use on the open, unimproved trail and result in more severe trail and resource degradation.
N090-2	People should have ORV training so as they will do less damage to the trail. Individual use could be limited to one week per summer (if we have to have trail closures). This time would be scheduled thru the park ranger.	Education has been and will continue to be part of NPS strategy for managing ORV use. Wrangell-St. Elias National Park and Preserve currently has information available about trail and weather conditions available on their website. Additionally, educational materials such as "Tread Lightly" information are handed out with ORV permits. WRST currently has two proposals in the NPS budget system that would fund educational efforts geared towards ORVs. One of those would produce a video informing potential ORV permittees about riding techniques to minimize trail damage. (N090-2, N097-6, and N097-7)
N097-6	Educate subsistence users on how to minimize impact in off trail travel and insure responsible subsistence use throughout the Park	
N097-7	Educate subsistence users on how to minimize impacts when traveling on established trails in the park.	
N092-1	I believe there needs to be a better trail permit system, possibly by proven past use (example-people who have had permits for 5 or 10 years) of these trails.	This comment and response should be combined with N092-2.
N092-2	At the very least I would like to see a permit that allows family members to drive an ORV while in the company of a subsistence user.	Individuals who reside outside of the park and the resident zone communities, but are rural Alaskans and have (or are members of a family that has) customarily and traditionally used park subsistence resources, may apply to the Park Superintendent for a subsistence eligibility permit, or 13.440 permit (page 3-68, Draft EIS). However, no legal authority exists for issuance of special use permits to non-rural residents living outside the area, even if they have family ties in the area; when recreational ORV use is not permitted on a given trail or area.

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N094-1	However, the non-motorized experience for visitors will be best enhanced by prohibiting motorized recreational use on the trails inside the national park, specifically the Copper Lake and Tanada Lake trails. These trails are both described as being in extremely degraded condition. Rather than devote the expense and resources to converting these trails to hardened surfaces capable of supporting motorized vehicles, the National Park Service should instead limit the trails to non-motorized uses and make moderate improvements to support non-motorized uses.	Not permitting recreational ORV use on the Tanada and Copper Lake trails is considered in Alternatives 1, 3, and 4 of the Draft EIS. Not permitting any motorized use is not considered because it would not meet the stated purpose for the project which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accommodates subsistence and access to inholdings..." (Draft EIS, page 1-1). Additionally, the Draft EIS does not consider an alternative that does not permit subsistence ORV use because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22).
N095-1	Numerical limits should be established, so you will not create another Cape Hatteras situation, in which DRVs gradually multiply and NPS loses control. Put strict numerical limits on DRVs allowed on each trail in a given day, month, or year.	Tables 2-4 and 2-5 in the Draft EIS (page 2-29) display monitoring standards and indicators and management tools for improved trails. These standards and indicators establish a physical "carrying capacity" for the improved trails.
N096-1	First and foremost is the selection of alt 5 as the Preferred. Remembering that the NPS mission is to preserve first, and provide for enjoyment and appropriate use second, the alt 5 seems to be the worst, preferring only the use and development side of the equation. There is so much trail (actually ATV road) construction, and so little resource protection that it does not fit the NPS Organic Act guidance.	Approximately 1/2 of the existing ORV use in the analysis area is related to subsistence (see Table 4-1 of the Draft EIS). The WRST General Management Plan in 1986 made the determination that ORVs were a traditional means of access for subsistence purposes (page 1-23, Draft EIS) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22). Consequently, part of the purpose of this project is to address access for subsistence (Draft EIS, page 1-1). Doing so without trail improvement would result in continued trail degradation and resource impacts, as described in the Draft EIS under Alternative 3. This is summarized in the Draft EIS in section 2.7, page 2-41.
N097-4	Leave trail areas that are currently in fair or reasonable condition unimproved. These trails will probably remain in reasonable condition for years, based on the type of ground they travel over. They may be more aesthetically pleasing if left unimproved than when improved.	Your suggestion may work on some segments of trail. However, a sustainable trail takes into account factors other than a durable tread, including controlled grade, contour curvilinear alignment, and integrated water control (See Draft EIS, pages C-1 and C-2).
N097-5	Educating both Park users and Park administrators regarding how this park is different from other national parks is key to a successfully managed Park, meeting each users' needs	The park's website currently includes information for visitors about how this park is different from other national parks in the lower 48. See, for example, the following link from the park's website regarding subsistence: http://www.nps.gov/wrst/parkmgmt/subsistence.htm

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N098-1	To protect the wilderness and rural lifestyle of the area, WRST needs to eliminate the recreational ORVs and have subsistence users permitted to designated non-wilderness trails only.	Alternative 3 of the Draft EIS proposes not permitting any recreational ORV use in the analysis area. However, Alternative 3 does not meet the stated purpose of the project, which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accommodates subsistence...while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1). The Draft EIS does not consider an alternative that does not permit subsistence ORV use because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22).
N098-2	ORV use should only be allowed when the ground is frozen with adequate snow cover to protect Park resources. Reasonable access should be by foot, horse, floatplane or wheeled aircraft.	Alternative 3 of the Draft EIS proposes not permitting any recreational ORV use in the analysis area. However, Alternative 3 does not meet the stated purpose of the project, which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accommodates subsistence...while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1). The Draft EIS does not consider an alternative that does not permit subsistence ORV use because the 1986 Wrangell-St. Elias National Park and Preserve General Management Plan made the determination that ORVs were a traditional means of access to subsistence activities (Draft EIS, page 1-23) and ANILCA Section 811 provides for continued access to public lands for subsistence use (Draft EIS, page 1-22). In addition, frozen conditions and adequate snow are not in place when people are permitted to subsistence hunt in the park/preserve or sport hunt in the preserve (generally early August through late September).
N098-3	Other means to provide public access or scenic viewing of the awesome views from the Nabesna Rd should be considered such as raised boardwalks or short hardened trails.	Raised boardwalks were not considered for non-motorized trails because other more cost-effective construction methods would be used. Short hardened non-motorized trails are considered in Alternative 5 of the Draft EIS.
N124-1	I thank the NPS for now attempting to repair and re-route miles of heavily damaged trails in its preferred alternative 5. However, the plan has two major flaws which need to be addressed...To correct these flaws I urge the NPS to take the following steps to control ORV use: 1. Determine which of the residents living near the park are legitimate subsistence users and which are not in order to identify the illegitimate users. 2. Require genuine subsistence ORV users to stay on designated park trails.	In response to point # 1 of your comment, the Draft EIS, page 3-68, describes the eligibility requirements for federal subsistence. These requirements will not change as a part of the Draft EIS (page 1-15, Draft EIS). For point #2, designation of all trails for subsistence ORV use is not considered in the range of alternatives because impacts associated with off-trail activities is limited at this time (page 3-10, first paragraph, Draft EIS).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N131-1	But, I would encourage the Park Service to make the fee substantial to aid the reconstruction process quicker. ORV users have thousands invested in their vehicles and a fee is part of having the privilege to continue to access areas using ORVs. I would suggest that the fee be broken down into day, week, season, and annual, with the longer periods being cheaper than the day fee etc.	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N131-2	However, not all of the wilderness is as sensitive to ORV disturbance as others. Maybe there would be a way to designate sections of trail(s) as "sensitive" and other sections as not, so that hunters, berry pickers, campers, can go off trail with their ORV's and use their vehicles to transport game, gear, etc back to the trail.	Based on public comment, the Final EIS analyzes an alternative that combines elements of the Draft EIS Alternatives 4 and 5. The sixth alternative includes a requirement that subsistence ORV users stay on designated trails in the Wilderness, but with allowance for game retrieval.
N131-4	I would encourage the Park Service to look at expanding the curb weight to 2,000 lbs, and to not allow any vehicles over that weight limit on its trails.	1,500 lbs. curb weight was proposed (page 2-7, Draft EIS) because it includes most ATVs, UTVs, and Argos.
N143-1	I would like to write in for Alternative 6. For all trails should be improved and we should be able to use all the trails (via permit).	The basic theme of Alternative 5 of the Draft EIS (identified as the NPS preferred alternative in the Draft EIS) is to improve most trails, then permit recreational ORV use on improved trails in both the park and preserve.
N144-1	Let's build non-motorized routes in the hard Park, away from ORV use areas if non-motorized users are bothered by motorized use.	The range of alternatives considered in the Draft EIS considers varying degrees of non-motorized trail construction, including none under Alternatives 1 and 2. Proposed construction of non-motorized trails in both the park and preserve meets management objectives identified for Visitor Opportunities/Access (page 1-6, Draft EIS) and would likely reduce motorized/non-motorized conflict on shared trails in the area (page 4-168, Draft EIS).
N145-4	We also urge NPS to provide appropriate non motorized trails and viewing sites for wildlife watching visitors in the Nabesna District. Many national parks have provided such facilities for visitors.	Alternative 3 of the Draft EIS proposes 26.2 miles of non-motorized trails or routes; Alternative 4 proposes 48.1 miles; and Alternative 5 (NPS preferred) proposes 76.9 miles. While wildlife viewing might not be a primary purpose for these proposed trails and routes, there would be ample opportunities for non-motorized wildlife viewing along any of these.
N148-1	We also agree with the selection of Alternative 5 as the Preferred Alternative, but with certain substantial modifications. We would like to see all trails repaired to a maintainable condition for all users.	Please see the response to comment #N143-1. In addition, the Final EIS analyzes a sixth alternative that proposes to fix the Suslota trail to a maintainable condition, then permit recreational ORV use on the improved trail.
N148-13	ROW feels that all trails should be multi-use, even the proposed new non-motorized trails. According to ANILCA, don't subsistence ORV users have the right to use any trails, new or old, as long as no resource damage occurs?	Section 811 of ANILCA states that "rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands" (Draft EIS, page 1-22). Throughout the range of alternatives presented in the Draft EIS, reasonable access to subsistence resources is provided on existing unimproved and improved trails. It is not unreasonable to require that a newly constructed trail be non-motorized in order to provide a diversity of recreational experiences in a national park/preserve, particularly when we are providing motorized access on existing and improved trails. Subsistence users are welcome to use the proposed non-motorized trails on foot or horseback or via other non-motorized means.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

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N148-17	We find Alternative 5 to be the best of the group, however, we feel many changes need to be made. Crucial issues concerning subsistence use are at stake. Off-trail ORV subsistence use in designated wilderness should not be eliminated before monitoring of new resource damage even occurs. Eligible wilderness designation should be reevaluated with larger buffers between trails and eligible wilderness. Access to inholdings should never be at risk, the RWCA process should be utilized. NPS appears too quick to create formulas for closure; the emphasis should be on repair and maintenance to keep trails open. Sport hunters and fishermen should have a higher priority for ORV use than pure recreational users. An effort should be made to minimize time spent on NEPA studies throughout the rest of the project. And, we strongly disagree with the idea that all management actions tables give NPS the ability to use the most restrictive options (closures) before even trying less restrictive ones.	Point #1, regarding off-trail ORV subsistence use: Please see response to comment #N085-10. Point #2, regarding trail buffers being enlarged: Please see response to comment #N148-4. Point #3, regarding access to inholdings: The Draft EIS does not put access to inholdings at risk; improved trails would be a benefit to inholders. Point #4, that NPS appears too quick to create formulas for closure: Two of the alternatives in the Draft EIS (including the NPS preferred alternative 5) propose, at great cost, to maintain and improve existing and long standing access routes in order to provide continued ORV access for subsistence, access to inholdings, and some recreational ORV use. Point #5, sport hunters and fishermen should have a higher priority for ORV use than pure recreational users: Based on what? Point #6, an effort should be made to minimize time and money spent on NEPA to implement trail improvement: This EIS will serve to tier subsequent NEPA compliance documents off of. And point #7, you strongly disagree with the idea that all management actions tables give NPS the ability to use the most restrictive options (closures) before even trying less restrictive ones: NPS will not commit to some order of management actions and would prefer to decide appropriate management actions on a case by case basis; it is NPS intent to keep existing trails open, thus the identification of Alternative 5 in the Draft EIS as the preferred alternative.
N150-1	Families who are inholding will help if their traditional use is carefully maintained	Access to inholdings will be managed as described in Chapter 2 of the Draft EIS (pp. 2-7 and 2-8) and consistent with the procedures described in the 2007 Established and Maintainable Access to Inholdings Programmatic Environmental Assessment (Draft EIS, page 1-27).
N153	As an idea for consideration, I propose that you consider managing with a "trail corridor" concept. In so, trails are given a designated width limit; perhaps 200-400 feet wide (or maybe some areas would need more). This would be similar to the typical highway ROW, which is commonly accepted. (In terms of both aesthetics and resource damage, to me, a muddy, rutted ATV trail is much more aesthetic, natural, and less indicative of damage than is a paved highway, or an improved gravel trail). Allow the past uses on the trails and monitor annually to assess any expansion approaching trail width limits. Areas with expansion that approaches limits could then be addressed with trail hardening improvements to keep the trail on course and prevent out of bounds damage.	Based on the analysis presented in Chapter 4 of the Draft EIS, managing with a "trail corridor" concept as suggested (unimproved trails) with any ORV use would result in moderate to major impacts to soils, wetlands, and vegetation. Managing in this manner would not accomplish the stated purpose for this project (page 1-1 of the Draft EIS) or many of the management objectives identified on pp. 1-5 and 1-6 of the Draft EIS.
Purpose and Need		
N085-1	Evaluation is centered on impacts from ORVs to trails, when the correct question is what is the impact from ORV use everywhere in the Nabesna District, not just on 9 trails .	Section 1.1 of the Draft EIS (Introduction) explains why the nine trails are the focus of the analysis (page 1-1, Draft EIS). However, other trails in the area are generally characterized on page 3-10 of the Draft EIS and the effects of these additional trails are discussed in the cumulative impacts section for each impact topic in Chapter 4 of the Draft EIS.

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N085-8	Instead of ORV use on these 94 miles of "trails" being part of a cumulative effect analysis, the management of these "other motorized trails" is actually part of the Need expressed in Chapter 1 and should be part of the different alternatives, with the impacts to the 20 miles of "other motorized trails" that go through wetlands addressed and mitigated.	See response to comment #N085-1. In addition, impacts to wetlands from other trails is discussed on page 4-38 of the Draft EIS and the NPS preferred alternative in the Draft EIS (Alternative 5) proposes off-trail monitoring and management actions that would minimize unmanaged proliferation of spur trails.
N125-3	There is a need to allow more motorized trails in the National Parks for the elderly and people that are no longer able to walk the trails.	The stated purpose of this project is to "describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational opportunities..." (Draft EIS, page 1-1). Fixing degraded trails and then allowing some recreational ORV use, as is proposed in alternatives 4 and 5 of the Draft EIS, at least partially meets that purpose.
Management Objectives		
N017-1	We strongly believe that there is absolutely no place in the National Park System for recreational ATV riding—especially in Alaska, the nation's last stronghold for truly wild lands. Primarily on State of Alaska general lands and federal BLM lands, there are tens of millions of acres available in our state for recreational ATV use, including millions of acres in the Copper Basin. There is no need for such use on lands managed by the agency which is supposed to be—and which Americans expect to be—the most protective of our federal land managers. The National Park Service is not a multiple use agency.	While the NPS has generally prohibited the use of ORVs in park areas, the regulations provide an exception to this general prohibition by allowing ORVs 1) on routes or in areas in preserve units pursuant to a special regulation, or 2) pursuant to a permit on existing ORV trails. As stated in the Management Objectives portion of the Draft EIS, recreational use of ORVs is viewed by NPS in Wrangell-St. Elias National Park and Preserve as a "means to access an activity or area" and if managed consistent with the criteria set forth in E.O. 11644, is a use that can be allowed consistent with law and policy.
N017-4	We also believe that there is no justification for recreational ATV use as a means of transportation to remote backcountry and Wilderness boundaries. First of all, ORV access results in an unacceptable level of damage to WRST resources compared to other means of access. Secondly, as a practical matter, we'd be interested in learning, for example, how many recreational ATV users ride to the Wilderness boundary, get off their machines, and pull on backpacks so they can enjoy a week of backpacking in the designated Wilderness (or how many wilderness enthusiasts use ATVs as transportation to Wilderness boundaries or to de facto wilderness; I don't personally know any). Third, wilderness recreation, by its very nature, does not include crowds of users in the same area. An opportunity to find a reasonable degree of solitude is another of the fundamental values of wilderness recreation.	In response to your first point, the Draft EIS acknowledges the impacts that have resulted from recreational ORV use in the Nabesna District. Alternatives 3, 4, and 5 of the Draft EIS would not permit recreational ORV use on unimproved trails in worse than fair condition. In response to your second point, there are numerous examples of people using ORVs to access wilderness opportunities. Sheep hunters, for example, use their ORVs to access dispersed base camps, then walk into the higher country to hunt. Some people use ORVs to access public use cabins (such as the Caribou Creek cabin), then day-hike from there, using the cabin as a base. In response to your third point, the effects to solitude and a primitive experience from the actions proposed in the range of alternatives is discussed in Chapter 4 of the Draft EIS, under the Wilderness impact topic, for both eligible and designated wilderness (Draft EIS, pp. 4-136 to 4-158).
N017	The National Park System can play an invaluable role, and provide a badly needed alternative, by encouraging healthy, traditional, muscle-powered, primitive forms of recreation.	As stated in the response to N017-4, ORVs can and do provide access to non-motorized activities. Additionally, Alternatives 3, 4, and 5 of the Draft EIS propose a range of non-motorized trails and routes.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

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N017-25	We believe the fact that ORV trails were established and used before WRST was established is not nearly as important as some people apparently feel it is. First of all, the levels of use were presumably far below what they are now and what they're projected to be in the future. Secondly, times change, and when the Congress legislates new designations a number of uses are continued while others are eliminated. Commercial logging might have occurred in WRST before establishment, but it is now no longer allowed. Similarly, recreational ORV use should now be prohibited in this special protected system, especially in light of the many opportunities available on BLM and state land.	Please see the response to comment #N017-1. This response does not use the argument that ORV trails were established and used before WRST was established.
N051-2	ANILCA clearly intended to protect these important traditional lifestyles for communities and individuals who chose a "way of life" that utilizes and is a part of the natural system. The federal management of today's conservation units should keep this mission in the forefront of their analysis.	Maintenance of existing access routes for subsistence purposes is stated as part of the purpose for this planning effort (page 1-1, Draft EIS). The general intent of Alternatives 4 and 5 of the Draft EIS is to improve and maintain existing access routes that provide opportunities for subsistence activities.
N056-1	Wrangell-St. Elias NP & Pres is a magnificent conservation unit, it deserves to be managed in a fashion that is guarantees high quality wilderness recreational experiences to all, while allowing for a reasonable amount of sustainable ORV subsistence and recreational use for those inclined to do so.	We agree. The Draft EIS states "The purpose of this Plan/EIS is to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accomodates subsistence and access to inholdings; while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1).
N064-5	Protection of Park resources and values takes priority over subsistence ORV use.	ANILCA Section 811 states that "...rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands." Access to subsistence resources can be provided for unless the activity is causing or is likely to cause "an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence use, conservation of endangered or threatened species, or the purposes for which the park area was established" (Title 36 CFR 13.460(b)). (Same response for N064-5 and NO69-3)
N069-3	Park resources and long-recognized park values should have higher priority than subsistence ORV use.	
N076-8	SVIA applauds the NPS's acknowledgement of its dual purposes in managing the Park and Preserve to balance resource conservation with visitor enjoyment and recreation, but believes that DEIS's discussion of the NPS's Management Objectives often does not sufficiently acknowledge the visitor enjoyment and recreation prong of the NPS's mission.	The purpose of the planning effort is to provide access for visitor enjoyment and recreation (Draft EIS, page 1-1, section 1.1.1) while providing for resource protection. The Management Objectives emphasize resource protection because of the need to address the impacts to park resources that are occurring because of ORV use in the Nabesna District (Draft EIS, page 1-2, section 1.1.2).
N076-10	The Management Objectives discussion further notes that the NPS intends to "Minimize impacts to the natural soundscape.,,28 This statement should be amended to clarify that the NPS intends to minimize impacts to the natural soundscape <i>while providing for appropriate recreation and visitor enjoyment opportunities consistent with its mission under AN/LCA and the NPS Organic Act.</i>	The text you suggest adding is already a part of the stated purpose for this project, which is "to describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accomodates subsistence and access to inholdings; while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1).

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N078-33	Page 1-6, Visitor Access Opportunities, first bullet: We recommend including photography and/or wildlife viewing in this section	The Final EIS has been edited to include photography and/or wildlife viewing under this bullet statement.
Permits, Law, and Regulations		
N002-4	The designation of ORV trails in wilderness areas is prohibited by Executive Order 11644 (Use of Off-Road Vehicles on Public Lands) and the Wilderness Act.	The Draft EIS states "ANILCA provides some exceptions to national park and wilderness management practices, including under certain circumstances motorized access for subsistence purposes..." (Draft EIS, page 1-25). Section 811 of ANILCA states that "rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands" and "...the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmachines, motorboats and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations" (Draft EIS, page 1-22). The 1986 General Management Plan for Wrangell St. Elias National Park and Preserve made the determination that ORVs were a traditional means of access to subsistence resources in the park/preserve (Draft EIS, page 1-23) and subsistence use is authorized by Title 36 CFR 13.460.
N016-8	The final ROD should in no way infringe on the ANILCA Section 811(b) rights given to federal qualified subsistence users. Motorized ground transportation has been traditionally pursued in the Preserve ever since technological advances in machinery have made it possible. Material damage caused to the habitat by ORV use should be mitigated through trail maintenance. Permanently closing down all off-trail ORV use in designated wilderness areas to federally qualified subsistence users should met with federal court challenges.	Section 811 of ANILCA states that "rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands" and "...the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmachines, motorboats and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations" (Draft EIS, page 1-22). NPS authorizes the use of ORVs for subsistence purposes under Title 36 CFR 13.460. Subpart (b) says that NPS may restrict or close a route or area if the Superintendent determines that such use is causing or is likely to cause "an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence uses, conservation of endangered or threatened species, or the purpose for which the park was established" (Draft EIS, page 1-22). Based on the level of existing impacts described in Chapter 3 of the Draft EIS, it is reasonable to propose (in Alternative 5) improvement and designation of trails in the wilderness and monitoring/management actions to prevent proliferation of trails and adverse impacts to soils, vegetation, wetlands, and wilderness.
N017-2	We don't believe the statutory purposes in ANILCA for the establishment of Wrangell-St. Elias NP& P ("WRST" or "Wrangell") include recreational ATV use.	They don't. Section 201(a) of ANILCA does state, in part "...and to provide continued opportunities, including reasonable access for mountain climbing, mountaineering, and other recreational activities" (Draft EIS, page 1-7).
N017-3	Additionally, but in more general terms, the courts have concluded that on National Park System lands conservation trumps enjoyment (1-17, 1-18); protecting all of WRST's resources, including the natural soundscape, should be the NPS's goal.	The range of alternatives presented in the Draft EIS attempt to balance access with resource protection. Resource protection is a part of the purpose and need of this project. See Draft EIS, page 1-1 (Purpose) and page 1-2, #2.

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N022-2	The proposal to allow recreational ORV use on trails within Wrangell-St. Elias National Park is inappropriate and illegal.	<p>Recreational ORV use in the preserve could be authorized using Title 36 CFR 4.10(b), which implements Executive Order 11644. This requires that the ORV use meet the criteria of the Executive Order and must be accomplished by the promulgation of a special park regulation (Draft EIS, page 1-22). Recreational ORV use in the preserve could also be authorized under Title 43 CFR 36.11(g)(2), on existing trails, with a permit, and upon a finding that such ORV use would be compatible with the purposes and values for which the park was established (Draft EIS, page 1-22).</p> <p>The use of any motor vehicle including ORVs is prohibited in national park areas, with certain exceptions, pursuant to 36 CFR 4.10. The regulation provides a limited exception for ORV use on designated routes and areas but only in national recreation areas, national seashores, national lakeshores and national preserves. The regulation does not authorize designating routes or areas for ORV use in national parks. An Alaska-specific regulation, 43 CFR 36.11(g)(2) authorizes Department of the Interior agencies to issue permits for ORV use on existing trails. Pursuant to that authority ORV use of the Copper Lake and Tanada Lake trails was permitted because those trails existed at the time the park was created. The re-routing of the Copper Lake and Tanada Lake trails proposed in Alternatives 4 and 5 of the Draft EIS precludes application of 43 CFR 36.11(g)(2) as that authorization is limited to existing trails. The re-routed trails were not in existence when the unit was created. The authorization of recreational ORV use on the re-routed trails in the national park would require promulgation of a special regulation.</p>
N025-2	The proposal to allow recreational ORV use on trails within Wrangell-St. Elias National Park is inappropriate and illegal, and would set a very dangerous precedent.	
N029-2	Regarding legality, given the damage to park resources that recreational ORV use is now causing, I do not believe that NPS has the authority to continue such use. Should NPS continue to permit recreational ORV use, I believe it will be in violation of several of its own legal and policy requirement	Please note that Alternatives 3, 4, and 5 of the Draft EIS would not permit recreational ORV use on unimproved trails in degraded condition. Based on analysis presented in Chapter 4 of the Draft EIS, recreational ORV use on improved and designated trails in the preserve would comply with the criteria in Executive Order 11644 and would not result in considerable adverse effects to the soil, vegetation, wildlife, wildlife habitat, or cultural or historic resources.
N047-2	And I strongly oppose the discussion of more wilderness. This is not in the spirit of the ANILCA compromise and I don't understand how it can even be legal considering the "no more clause" in ANILCA.	None of the alternatives presented in the Draft EIS propose any change to the amount of designated wilderness in Wrangell-St. Elias National Park and Preserve. What is proposed is an adjustment to the wilderness eligibility (See page 2-2 of the Draft EIS, under Revised Wilderness Eligibility Map. The difference between eligible, suitable, and designated wilderness is explained in Appendix A of the Draft EIS.
N059-2	In accordance with ANILCA, the NPS must determine which of the estimated 6,000 residents living near the park are legitimate subsistence users and which are not.	The eligibility requirements for subsistence use are described on page 3-68 of the Draft EIS. Anyone who is eligible based on meeting the requirements is considered a "legitimate" subsistence user.

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N072-21	Mechanism for Authorizing Recreation ORV Use: We were struck by the comment on page 2-7 that "If the alternative ultimately selected for implementation permits recreational ORV use, that use would be authorized through promulgation of a regulation." This seems to be sending several messages: 1.) sustainable trails on lands designated as National Preserve will be authorized for recreational riding under 36 CFR 4.10 which says that "designation of routes or areas must be accomplished by promulgation of a special park regulation; and 2.) for any recreational ORV use trails on lands designated as National Park, NPS will NOT use the existing regulation 43 CFR 36.11 (g) as that regulation does not require any additional regulations.	The mechanism for authorizing any use will be addressed in the Record of Decision.
N072-52	Alternative #5 – our primary concern with Alternative 5 is that it proposes to allow recreational ORV riding in the National Park while we continue to argue that recreational ORV riding in ANY National Park, including those in Alaska, is illegal. Should the Park Service move ahead with this alternative, there would still need to be a finding under 43CFR 36.11 (g)(2) that this access is compatible with park purposes. This finding should seek to determine a carrying capacity for the trails and set limits on recreational ORV riding so that a compatibility determination could be sustained and achievable.	Given the major re-routes or reconstruction needed to improve the Copper Lake and Tanada Lake trails, it would be hard to argue that the improved trail would constitute an "existing" trail. NPS intent under Alternative 5 would be to pursue authorization of recreational ORV use on improved trails in the park through a special regulation that would be an exception to Title 36 CFR 4.10(b). Please note that the Final EIS, based on public comment, analyzes a sixth alternative (which combines elements of Alternatives 4 and 5 of the Draft EIS) that would improve trails and permit recreational ORV use on improved and designated trails in the preserve, but would not permit recreational ORV use on improved trails in the park.
N072-55	The authorization of recreational ORV use in Wrangell Park must be removed from the preferred alternative because the NPS lacks statutory authority to authorize such recreational ORV use in National Parks. Specifically, NPS exceeds its statutory authority in issuing permits for non-subsistence ORV use pursuant to 43 C.F.R. § 36.11(g)(2). Furthermore, issuing permits for recreational, non-subsistence ORV use violates the NPS Organic Act because non-subsistence use impairs park resources.	Please see responses to comments #N072-21 and N072-52. In addition, while the Draft EIS concludes that there would be major impacts to soils, wetlands, and vegetation from ORV use on unimproved trails, it did not find that these impacts would result in the impairment of those park resources. See pp. 4-12 (Soils), 4-41 (Wetlands), and 4-62 (Vegetation). And, in alternatives that propose to fix trails (4 and 5), impacts to soils, wetlands, and vegetation are predicted to be minor. Based on the 2010 "Interim Guidance for Impairment Determinations in NPS NEPA Documents" the Final EIS includes Appendix A, which includes an impairment determination for each impact topic for Alternative 6 (the preferred alternative). Consistent with the Interim Guidance, the Final EIS does not include impairment determinations for the other alternatives.
N072-56	In contrast to these expressly protective mandates, the NPS has no explicit authority to permit recreational ORV use in park system units under either the Organic Act or ANILCA. To the extent the NPS claims implicit authority to do so, it must be narrowly constrained by the protective mandates of the Organic Act and ANILCA.	Neither the Organic Act nor ANILCA expressly authorize recreational ORV use.
N072-57	ANILCA contains no such implied authority for non-subsistence ORV use, nor is non-subsistence ORV use "directly and specifically provided for" by Congress in any other law. Authority is also further constrained by Executive Order (EO) 11644...	Neither the Organic Act nor ANILCA expressly authorize recreational ORV use.

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N072-58	NPS regulations implementing the executive order provide that ORV use is prohibited on NPS lands except on roads, parking areas, or routes and areas that have been designated by promulgation of a regulation. 36 C.F.R. § 4.10(a) and (b). Most significantly, Section 4.10(a) and (b) provide that such routes or areas may not be designated in national parks, but only in national recreation areas, national seashores, national lakeshores, or national preserves. 36 C.F.R. § 4.10(b).	The comment correctly sets forth the content of the regulation. See Draft EIS, page 1-22, sections 1.7.3.2 and 1.7.3.3.
N072-59	This regulation does not revoke the prohibition on trail designation in parks as to Alaska, nor does it conflict with 36 C.F.R. § 4.10(b). See 43 C.F.R. § 36.11(g)(1) (designation must be made "in accordance with Executive Order 11644" or pursuant to 36 C.F.R. § 36.10). Additionally, this regulation applies to all conservation system units (CSUs), national recreation areas, and national conservation areas within Alaska administered by the Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), or NPS. 43 C.F.R. § 36.1(a).	"This regulation" referred to in your comment is 43 CFR 36.11(g)(1) and your comment correctly summarizes the regulation. we agree with your comment.
N072-60	NPS exceeds its statutory authority by proposing to issue non-subsistence ORV permits pursuant to 43 C.F.R. § 36.11(g)(2), ⁷ because neither the Organic Act, Executive Order 11644, nor ANILCA provides authority for non-subsistence ORV use ⁸ .	We disagree with your interpretation of NPS statutory authority. 43 CFR 36.11(g)(2) states "The appropriate Federal agency is authorized to issue permits for the use of ORVs on existing ORV trails located in areas (other than in areas designated as part of the National Wilderness Preservation System) upon a finding that such ORV use would be compatible with the purposes and values for which the area was established. The appropriate Federal agency shall include in any permit such stipulations and conditions as are necessary for the protection of those purposes and values." The regulations define <i>area</i> as "a Conservation System Unit, National Recreation Area, or National Conservation Area in Alaska administered by the NPS, the FWS or the BLM" (43 CFR 36.2(e)).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-61	The DEIS preferred alternative includes authorized recreational ORV use on both National Park and National Preserve trails. DEIS at 2-30. However, as the NPS recognized through the adoption of 36 C.F.R. § 4.10, whatever authority it may have to permit recreational ORV use is narrow and does not extend to the national parks. Section 4.10 thus balances and implements the NPS' protective mandates, and applies to all national park system units. Because the NPS must apply 36 C.F.R. § 4.10, rather than 43 C.F.R. § 36.11, to clearly and properly manage recreational ORV use in Wrangell-St. Elias preserve areas, recreational use cannot be permitted in the park. Should NPS proceed with a management plan that would authorize recreational ORV use in the park, we contend that not only is such authorization unlawful, but that the NPS is unable to make the requisite compatibility finding because recreational ORV use is not compatible with the park's purposes. Consequently, NPS should remove authorized recreational ORV use on the Boomerang, Copper Lake and Tanada Lake trails (all ORV trails in the park) from its preferred alternative in the Final EIS.	Based on public comment, the NPS has analyzed a sixth alternative in the Final EIS. This alternative combines elements of the Draft EIS Alternatives 4 and 5. It would improve all nine trails to a maintainable condition, then permit recreational ORV use on improved and designated trails in the preserve. It would re-route the Tanada Lake trail out of wetlands, designate trails for subsistence ORV users in the Wilderness, adopt the proposed Wilderness Eligibility Revision, and adopt monitoring standards/management actions for subsistence ORV off-trail use. It also includes all proposed non-motorized trails and routes proposed in the Draft EIS Alternatives 4 and 5. Given the major re-routes or reconstruction needed to improve the Copper Lake and Tanada Lake trails, it would be hard to argue that the improved trail would constitute an "existing" trail. NPS intent under Alternative 5 would be to pursue authorization of recreational ORV use on improved trails in the park through a special regulation that would be an exception to Title 36 CFR 4.10(b). Please note that the Final EIS, based on public comment, analyzes a sixth alternative (which combines elements of Alternatives 4 and 5 of the Draft EIS) that would improve trails and permit recreational ORV use on improved and designated trails in the preserve, but would not permit recreational ORV use on improved trails in the park.
N076-3	As the NPS must maintain the trails for subsistence ORV use, it makes little sense not then to allow reasonable levels of recreational ORV use, as doing so fulfills its statutory mandate and imposes a minimal additional burden on the agency and minimal, if any, additional impacts on Park and Preserve resources.	Alternatives 1, 2, 4, and 5 of the Draft EIS propose to allow reasonable levels of recreational ORV use. We disagree that we have a "statutory mandate" to do so.
N076-9	Nothing in ANILCA, the NPS Organic Act, or any other applicable law prohibits "recreational" ORV usage consisting of ontrail operation of ORVs consistent with applicable NPS rules and regulations to access areas of the Park and Preserve for sightseeing and other non-specific activities otherwise permissible under NPS rules and regulations. However, the NPS's statement that it will not manage trails to accommodate "recreational ORV use as an activity unto itself" lends itself to such an interpretation and should be removed from the DEIS.	While the NPS has exercised authority granted by the Organic Act to generally prohibit ORV use in park areas, current regulations permit the general use of ORVs under two separate regulatory provisions: 1) section 4.10(b) of 36 CFR which allows Alaska park superintendents to designate routes and areas in non-wilderness national preserves pursuant to a special regulation after considering the impacts discussed in section 3 of E.O. 11644; and 2) 43 CFR 36.11(g) which allows superintendents to issue permits for ORVs on existing ORV trails, but not in wilderness, upon determining such use is compatible with park purposes. In this Draft EIS/Plan, if NPS authorizes recreational ORV use, it will be for the purpose of access to other recreational pursuits, including sport hunting in the preserve.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N076-12	The DEIS's discussion of the NPS Organic Act also requires clarification regarding the NPS's dual purposes of resource conservation and visitor enjoyment and recreation. The DEIS states that "courts consistently interpret the NPS Organic Act and its amendments to elevate resource conservation above visitor recreation. . . . The NPS Management Policies 2006 also recognize that resource conservation takes precedence over visitor recreation. The important point, however, is that resource conservation predominates over visitor recreation only when the two are in irreconcilable conflict. Absent such conflict and "impairment" of park resources, the NPS has latitude to determine what recreational uses of the Park and Preserve are suitable. While that section of the DEIS goes on to discuss the NPS's latitude to make such determinations, SVIA believes that the quoted statements regarding conservation predominating above recreation could be used out of context to attack management decisions to allow otherwise acceptable forms of recreation in the Park and Preserve.	The formatting of this section of the Draft EIS has no bearing on the stated purpose of the project (page 1-1, Draft EIS) or the range of alternatives, which demonstrate NPS intent to maintain access routes into the park/preserve that have existed since before the establishment of the park.
N076-13	That same section of the DEIS quotes part of a statement from <i>National Rifle Association of America v. Potter</i> , ³ in which the U.S. District Court for the District of Columbia stated, "In the [NPS] Organic Act, Congress speaks of but a single purpose, namely, conservation[.]" ³¹ This statement, taken in isolation from that court's opinion, is misleading as the NPS Organic Act plainly speaks of dual purposes, to balance resource conservation with visitor enjoyment, as discussed above. Several subsequent decisions, including from the Court of Appeals for the D.C. Circuit and the Court of Appeals for the Ninth Circuit, have expressly acknowledged that the NPS Organic Act speaks of visitor enjoyment as a purpose of the NPS. ³² Accordingly, the quote from <i>National Rifle Association v. Potter</i> should be removed from the DEIS as it presents a misleading and likely inaccurate interpretation of the NPS Organic Act, and could be used by opponents of ORV usage to argue that the NPS must ban all non-subsistence (i.e., "recreational") ORV usage throughout the Park and Preserve.	The sentence "The court in <i>National Rifle Association of America v. Potter</i> , says "in the Organic Act Congress speaks of but a single purpose, namely, conservation." has been removed in the Final EIS.
N077-2	Other existing resident zone communities might also be found to no longer qualify for resident zone status, while other communities might gain such status. We urge the NPS to undertake the required periodic review.	Please see section 1.5.2 of the Draft EIS (<i>Impact Topics Considered but Eliminated from Detailed Analysis in this Combined ORV Management Plan and EIS</i>) and refer to the sub-heading Federal Subsistence Regulation.
N077-3	Yet, as in the case of resident zone reviews discussed above, the NPS has ignored the will of Congress by refusing to make the required determination. Its refusal to comply with the intent of Congress has allowed subsistence ORV users, riding technologically advanced four-wheelers introduced in the 1980's after the park's establishment, to penetrate areas in the park that the earlier park planners determined were not traditional subsistence use areas.	Please see the response to comment #N077-2. Additionally, the 1986 General Management Plan for Wrangell-St. Elias National Park and Preserve determined that ORVs were a traditional means of access in the park/preserve for subsistence purposes (page 1-23, Draft EIS).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N077-4	In the section on applicable federal laws, regulations, and policies, Sec. 111 O(a) of ANILCA, Special Access and Access to Inholdings, is not included. In the final EIS this fundamental provision governing motorized and non-motorized access in national parks and preserves (and other conservation system units) must be included and the authors obliged to explain why they omitted it in the Draft EIS.	The Final EIS will include a description of ANILCA Section 1110(a).
N077-5	The use of recreational ORVs in the park/preserve is not permitted under Sec. 1110 (a). And while the Act does not prohibit recreational ORVs if allowed by other law, neither does the Act direct the NPS to permit recreational ORVs on park or preserve lands.	43 CFR 36.11 implements the provisions of section 1110(a) of ANILCA regarding use of snowmachines, motorboats, non-motorized surface transportation, aircraft, as well as off-road vehicle use. 43 CFR 36.11(g)(2) authorizes federal agencies to issue permits for the use of ORVs on existing ORV trails, except in areas designated as wilderness, upon a finding that such ORV use would be compatible with the purposes and values for which the area was established.
N078-2	We recognize that certain park constituents are opposed to allowing continued recreational ORV use on "park" lands, in part based on concern that doing so will open the door to more recreational ORV use in other park areas within the Wrangell-St. Elias complex, or to other parks in Alaska. We believe this concern is unwarranted. The National Park Service has shown restraint in allowing non-subsistence use of ORVs on parklands in Alaska. The few allowances are site-specific, based on well-documented established use, and are accompanied by management prescriptions to avoid, mitigate, or repair resource damage.	Re-routing the Copper Lake and Tanada Lake trails would eliminate them from the category of an "existing" trail. Alternative 5 would authorize recreational ORV use on improved trails in the park. The Final EIS, based on public comment, analyzes a sixth alternative (which combines elements of Alternatives 4 and 5 of the Draft EIS) that would improve trails and permit recreational ORV use on improved and designated trails in the preserve, but would not permit recreational ORV use on improved trails in the park.
N078-30	We request the Service ensure the project conforms with state management or RS 2477s, as follows: 1. Fees assessed to users are applied to the cost of continued recreational access through improvement and maintenance of trails. 2. Fees support access to an area or trail that would otherwise be subject to closure due to substantial resource degradation. 3. If fees are only assessed to users of motorized equipment, such fees should not be used for non-motorized trail improvements, as previously noted.	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N078-31	Service actions to close or re-route trails along RS 2477 ROWs do not diminish the State's assertions of validity nor the State's ability to pursue improvements or other supplemental management actions	We agree that implementation of actions described within the range of alternatives in the Draft EIS would not affect the status or validity of other access rights under state and federal authorities (such as RS 2477). However, none of these RS 2477 ROW assertions have been affirmatively validated by a federal court ruling, and until there is a federal court ruling, the validity of these assertions is unresolved.

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N078-34	Page 1-22, 1.7.3.4: We question the inclusion of 36 CFR 4.10(b) as it is superseded by 36 CFR 36.11(g)(2).	In 1986, the Department of Interior (DOI) promulgated regulations governing access in Alaska conservation system units. These regulations are found in 43 CFR part 36. Though ANILCA does not authorize the general use of ORVs, part 36 regulations include a provision allowing ORVs. The DOI provision allows the land managing agency to authorize the general use of ORVs two different ways: 1) in accordance with E.O. 11644; or 2) pursuant to a permit from the superintendent. The permit option allows ORV use by permit on existing ORV trails not in wilderness, upon a finding of compatibility.
N078-35	Page 1-25, 1.7.5.2: We request adding Section 707 of ANILCA as a separate bullet	A description of Section 707 of ANILCA will be added as a separate bullet in the Final EIS.
N078-36	Page 1-25, 1.7.5.2, fourth bullet: We recommend including additional direction found in Section 1303 of ANILCA, which provides for the <i>"temporary use, occupancy, construction, and maintenance of new cabins or other structures if ... determine[d] ... necessary to reasonably accommodate subsistence uses or is otherwise authorized by law."</i>	The section 1303 citation will be added to the fourth bullet of section 1.7.5.2 in the Final EIS.
N078-37	Page 1-27, 1.7.6.1: We request Section 815 of ANILCA also be referenced here, which states: <i>"Nothing in this title shall be construed as ... authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands (other than national parks or national monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable laws"</i>	The citation from Section 815 of ANILCA will be added as a third bullet statement under section 1.7.6.1 in the Final EIS.
N078-38	Page 1-27, 1.7.6.1: We request adding Section 1314 of ANILCA as a separate bullet as a reminder that the State manages fish and wildlife except as specifically preempted by federal law	Section 1314(a) of ANILCA will be added under Section 1.7.6.1 in the Final EIS.
N079-1	First and foremost, this EIS should NOT address or in any way attempt to modify or impose further management rules upon subsistence use as provided for under ANILCA. The EIS was required by the court as a result of litigation that arose over recreational ORV use in this portion of the WRST. As such, the EIS should focus on recreational ORV use only	Section 811 of ANILCA states that "rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands" and "...the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmachines, motorboats and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations"

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Letter ID - Comment ID	Substantive Comment	NPS Response
N080-5	We recommend that off-trail ORV use be allowed in designated wilderness for subsistence users. Such use is consistent with the provisions in ANILCA Section 811 and the regulations at 36 CFR 13.460(b)	(Draft EIS, page 1-22). NPS authorizes the use of ORVs for subsistence purposes under Title 36 CFR 13.460. Subpart (b) says that NPS may restrict or close a route or area if the Superintendent determines that such use is causing or is likely to cause "an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence uses, conservation of endangered or threatened species, or the purpose for which the park was established" (Draft EIS, page 1-22). Based on the level of existing impacts described in Chapter 3 of the Draft EIS, it is reasonable to propose (in Alternative 5) improvement and designation of trails in the wilderness and monitoring/management actions to prevent unmanaged proliferation of trails and adverse impacts to soils, vegetation, wetlands, and wilderness. (Same response for N079-1 and N080-5)
N081-5	ANILCA does not give sport hunting by non-locals similar favored treatment; this exclusion is entirely appropriate on these special, non-multiple use lands, especially when there are hundreds of thousands of acres of BLM and general state land in the region open for sport hunting by ORV. We support sport hunting in the Preserve, but ORV use only for subsistence purposes. And certainly recreational ORV use should never be allowed in the Park.	Section 1313 of ANILCA allows sport hunting in national preserves (Draft EIS, page 1-27). Not permitting any recreational ORV use (which is mostly to support access to sport hunting in the preserve), as is proposed under Alternative 3 of the Draft EIS, does not meet the stated purpose of this project, which is to "describe a strategy to provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational opportunities...while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1).
N081-11	In Alaska, subsistence use of motorized vehicles is protected in the Wilderness, an accommodation that we support, but in additional federal land managing agencies, including the Park Service, seem to believe, incorrectly, that ANILCA requires them to allow purely recreational snowmachining and certain other motorized recreational activities even in designated Wilderness	We do not contend that "ANILCA requires [NPS] to allow purely recreational snowmachining and certain other motorized recreational activities even in designated wilderness." See Section 1.7.3 of the Draft EIS (<i>Access and Use of ORVs</i>).
N082-1	I never heard a single word about allowing recreational ORVs to enter these parks, and I don't believe Congress intended them to be there.	Please see section 1.7.3 of the Draft EIS (<i>Access and Use of ORVs</i>) which describes the legal authorities under which ORV use may be permitted in Alaska parks.
N082-2	We oppose Alternative 5, which allows ORVs in WRST National Park, and believe it is not consistent with the statutory mandates in ANILCA and in the NPS Organic Act, nor with applicable Executive Orders.	Given the major re-routes or reconstruction needed to improve the Copper Lake and Tanada Lake trails, it would be hard to argue that the improved trail would constitute an "existing" trail. NPS intent under Alternative 5 would be to pursue authorization of recreational ORV use on improved trails in the park through a special regulation that would be an exception to Title 36 CFR 4.10(b). Please note that the Final EIS, based on public comment, analyzes a sixth alternative (which combines elements of Alternatives 4 and 5 of the Draft EIS) that would improve trails and permit recreational ORV use on improved and designated trails in the preserve, but would not permit recreational ORV use on improved trails in the park.

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N093-1	There is no mandate to designate routes for ORV use for recreational purposes it is discretionary and physically can only be conducted without impairment to the resource. Research has shown impairment will occur to the routes and hardening of the trails creates impairment in its attempt to reduce long term irreversible damage and is not realistic nor financially cost effective for the entire length of existing trails in fragile areas for recreational purposes.	Analysis presented in Chapter 4 of the Draft EIS concludes that the reconstruction, hardening, or re-routing of existing trails and subsequent use of those trails by ORVs would result in minor impacts to soil, wetlands, and vegetation.
N096-1	First and foremost is the selection of alt 5 as the Preferred. Remembering that the NPS mission is to preserve first, and provide for enjoyment and appropriate use second, the alt 5 seems to be the worst, preferring only the use and development side of the equation. There is so much trail (actually ATV road) construction, and so little resource protection that it does not fit the NPS Organic Act guidance.	Alternative 5 addresses the resource concerns associated with existing trail condition by improving trails without causing unacceptable impacts or impairment, as required by the Organic Act (page 1-18, Draft EIS). In doing so, access is provided for backcountry and wilderness activities, which also accommodates subsistence uses and access to inholdings (Draft EIS, page 2-41).
N096-2	Allowing subsistence use in wilderness is one thing, but designating a permanent road (oops, you call it a "trail") is another. That designation and any construction or improvement is a violation of wilderness law.	ANILCA provides some exceptions to national park and wilderness management practices, including under certain circumstances motorized access for subsistence purposes (Section 811). The proposal to improve and designate trails in the wilderness considered under Alternative 5 of the Draft EIS is intended to keep subsistence ORV users on one maintainable trail alignment and thus minimize off-trail impacts. As stated in Chapter 2 of the Draft EIS, "all work in designated wilderness would be done using hand crews" (Draft EIS, page 2-37). (Same response for N096-2 and N146-1)
N146-1	However, with alt. 5, ORV use -of any kind- should not be allowed in the Wilderness as motorized use is specifically against the wilderness mandate.	
N098-4	The designation of ORV trails in wilderness areas is prohibited by Executive Order 1644 (Use of Off-Road Vehicles on Public Lands) and the Wilderness Act.	See response to comment #N096-2. Additionally, ORV use for subsistence purposes is authorized by Title 36 CFR 13.460. Executive Order 11644 does not apply to ORV authorizations pursuant to provisions of ANILCA.
N099-4	Second, NPS did not include any discussion of or guidance from ANILCA Section 1110(a) for access and it does not appear in the DEIS as it should. Section 1110(a) allows for mechanized access for traditional uses and access to private inholdings. Recreational ORV and ATV uses are not considered traditional and therefore are not permitted.	The Draft EIS describes 43 CFR 36.11(g)(2) related to ORVs (Draft EIS, page 1-22). However, the Final EIS will include a description of ANILCA Section 1110(a).
N099-5	Third, the proposed expansion of lands eligible for wilderness designation is welcomed, but should not be used to unnecessarily draw larger buffers along the Nabesna Road or to create exclusionary pipe-stems into otherwise eligible lands to accommodate the prospect of recreational ORV and ATV uses which are clearly not legal in Wilderness Areas	The need for the proposed revision to the 1986 eligible wilderness mapping is explained in the Draft EIS on page 2-2. It was based on objective re-application of the criteria used in 1986, and based on conditions that existed in 1986 (or prior to it). See Appendix A of the Draft EIS to see a list of the 1986 criteria, an explanation of the methods used, and aerial photography displaying some of the existing trails in the early 80s.

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Letter ID - Comment ID	Substantive Comment	NPS Response
N099-6	Fourth, the NPS should review the Title VIII Subsistence eligibility criteria to determine whether or not they are allowing too much pressure on fish and game resources in WRST because of population growth in the Subsistence Residence Zones adjacent to WRST.	Eligibility requirements for subsistence uses in the park are explained on page 3-68 of the Draft EIS. They will not be reviewed or changed as part of this planning effort. Please see section 1.5.2 of the Draft EIS (Impact Topics Considered but Eliminated from Detailed Analysis in this Combined ORV Management Plan and EIS) and refer to the sub-heading Federal Subsistence Regulation.
N145-2	We do not believe recreational ORVs are consistent with this mandate (ANILCA Section 201 (9)). ORVs in the Nabesna District have already impaired the scenic beauty and quality, and they have impaired the wildlife habitat of the national park and preserve.	Given the fact that all nine trails and ORV use on them existed well before establishment of the park, NPS contends that ORVs, managed in a manner that prevents resource impacts, provide "reasonable access for mountain climbing, mountaineering, and other wilderness recreational activities" (from Section 201(a) of ANILCA, as quoted on page 1-7 of the Draft EIS). The Draft EIS, for Alternative 1 (No Action or the existing situation) concludes that the impacts to scenic quality are minor and to wildlife habitat are minor and that these impacts do not constitute impairment of those park resources (Draft EIS, page 4-88 for wildlife and page 4-103 for scenic quality).
N148-2	"On the trail systems in designated wilderness, subsistence ORV users would be required to stay on designated trails." This is a significant restriction of our ANILCA 811(b) right to use, for subsistence purposes, "...other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation." This restriction would appear to be a closure before projected, estimated resource damage actually occurs. Subsistence use should be allowed off the trails in designated wilderness, and the monitoring program should determine the existence of several indicators not just one before curtailed use is even considered. Using rulemaking to close down all off-trail use to subsistence users in designated wilderness is premature and wrong.	Section 811 of ANILCA states that "rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands" and "...the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmachines, motorboats and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations" (Draft EIS, page 1-22). NPS authorizes the use of ORVs for subsistence purposes under Title 36 CFR 13.460. Subpart (b) says that NPS may restrict or close a route or area if the Superintendent determines that such use is causing or is likely to cause "an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence uses, conservation of endangered or threatened species, or the purpose for which the park was established" (Draft EIS, page 1-22). Based on the level of existing impacts described in Chapter 3 of the Draft EIS, it is reasonable to propose (in Alternative 5) improvement and designation of trails in the wilderness and monitoring/management actions to prevent proliferation of trails and adverse impacts to soils, vegetation, wetlands, and wilderness. In addition, based on public comment, the Final EIS analyzes a sixth alternative. This alternative combines elements of Alternative 4 and 5 analyzed in the Draft EIS. The sixth alternative proposes designation of improved trails in the wilderness for subsistence ORV users, but with allowance for game retrieval.
N148-5	You are proposing to eliminate all off-trail use in the wilderness. But all acreage not a part of a trail or an inholding is proposed to be eligible wilderness. Since NPS is mandated to manage eligible wilderness the same as designated, does it not follow that you will try to eliminate off-trail use in all eligible areas as well? That would be an unacceptable loss of an ANILCA right, and should be clarified.	There is no proposal within the range of alternatives considered in the Draft EIS or in the Final EIS to require subsistence ORV users to stay on designated trails outside of designated wilderness.

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Letter ID - Comment ID	Substantive Comment	NPS Response
N148-6	Just for the record, it seems that the statute of limitations should have run out long ago on the ANILCA Section 1317(a) mandate to conduct eligible wilderness reviews. The 1980 statute allowed 5 years for the reviews and 7 years for Presidential approval. Both expired decades ago; a failure to settle in hopes of the agencies acquiring more and more wilderness land with environmental restrictions over the years is strangling Alaskans.	The Draft EIS proposes a revision of the 1986 review of eligibility, not a new review.
N148-9	Chapter 2 of the EIS, page 2-7, states that ORVs used for access to inholdings may be affected by closures. Quite frankly, after the long struggle in WRST to establish the NPS Right of Way Certificate of Access (RWCA) process, we are surprised to see that the management plan warns that access to inholdings may be affected. The whole purpose of the RWCA is to come to an agreement between the NPS and the inholder over use, methods and means, as well as maintenance. The ability to reach one's home is access of the highest priority. The same Table 2-3 mentioned above would be used, and it is labeled with the same qualifier that tools need not be tried in order from least to most restrictive, that closures could be mandated first. This is totally unnecessary if the RWCA process is applied. Even the existence of other user groups on the inholder's trail does not reduce the necessity to provide inholder access according to ANILCA. This appears to be a total contradiction in WRST policy.	The regulations implementing section 1110(b) of ANILCA afford inholders with adequate and feasible access. Any actions implementing this plan will be consistent with inholder access regulations.
N148-14	The EIS states on page 4-2 that an estimated 85% of current recreational ORV users are sport hunters. These hunters and fishermen seek access in support of a traditional activity under ANILCA law. This is a huge percentage of ORV recreational use under the proposed plan. They deserve a higher priority than pure recreational users, in our opinion.	Section 1313 of ANILCA allows sport hunting in national preserves (Draft EIS, page 1-27), but ANILCA does not authorize ORVs as a means of access to sport hunting. Section 1110(a) of ANILCA states "...the Secretary shall permit, on conservation system units...the use of snowmachines (during periods of adequate snow cover, or frozen river conditions in the case of wild and scenic rivers), motorboats, airplanes, and non-motorized 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."

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Letter ID - Comment ID	Substantive Comment	NPS Response
N148-19	The restrictions to subsistence uses guaranteed by ANILCA proposed in the current draft of the EIS are aggressive and unfounded, and are bound to cause problems if initiated.	NPS contends that the proposed restrictions to subsistence ORV use are reasonable and needed, based on the analysis presented in Chapter 4 of the Draft EIS. Designation of trails for subsistence ORV users in Wilderness under Alternative 5 is proposed to prevent proliferation of trails and impacts to the undeveloped character of Wilderness. This action is proposed to mitigate impacts and enable NPS to continue to allow subsistence ORV use in the Wilderness. Outside of Wilderness, Alternative 5 proposes to monitor off-trail use. The intent of these proposed actions is to maintain subsistence ORV use and ensure it into the future. These proposed actions are reasonable, particularly in light of the fact that the 1986 General Management Plan for Wrangell-St. Elias National Park and Preserve recommends "based on the access inventory and ORV/ATV study, the superintendent will close routes, designate routes, or impose restrictions on the season of use, type and size of ORV vehicles, vehicle weight, or the number of vehicles or trips" (Draft EIS, page 1-23).
N151-1	I am concerned that your actions will set a precedent for actions taken on other public lands.	Every situation is different and other public lands may have different mandates/policy/direction.
Monitoring		
N015-2	If Airplanes use as a means of access is approved, it should be closely monitored during the fall hunting season.	Use of airplanes to access sport or subsistence hunting is the national preserve is currently allowed. Use of airplanes is beyond the scope of this EIS.
N015-8	Finally, we agree with the Slana resident's comments that management actions for trail closure should occur in the following order: 1. Non-hunting Recreation Use, 2. Hunting Recreation Use, 3. Administrative Use, 4. Subsistence Use	Table 2-5 describes management tools that may be used to respond to monitoring of improved trails. Table 2-5 indicates that, if closure were necessary, it would be to recreational ORV users first.
N016-9	The standards for what trail conditions would result in trail closures, Table 2-2. Monitoring Indicators and Standards for Unimproved Trails. seem overly restrictive.	The basic goal of the monitoring standards and indicators presented in Table 2-2 is to prevent resource impacts associated with unimproved trails from increasing in extent or intensity. Less "restrictive" standards would not accomplish this goal.
N017-8	Finally, we are concerned that the statement in the Preferred Alternative that "unmanaged proliferation of trails is minimized" is not nearly strong enough. The Park Service should seek to eliminate/prevent such proliferation, and if it starts to occur to any degree appropriate management tools need to be strictly implemented.	The monitoring/management actions proposed for off-trail use (Table 2-6) under Alternative 5 of the Draft EIS is intended to prevent the creation of new "trails". It won't eliminate ORV use off existing trails, but will minimize impacts associated with off-trail use.
N017-23	Finally, will adequate resources be committed to monitoring? The lack of adequate monitoring is a very common problem and it's not clear that it won't be a problem in this situation as well.	We hope the trail repairs would rate high in the NPS budget system because they protect resources.
N064-2	Designated subsistence trails would be monitored prior to, during and after the fall hunting season. If impairment is occurring immediate closure until the damage is corrected according to Executive Order 11644.	Monitoring each trail three times per season is not a reasonable expectation because of staffing and budget constraints.

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Letter ID - Comment ID	Substantive Comment	NPS Response
N072-17	There is an apparent inconsistency in how the Park Service evaluates trails for continued use. The standard for opening a trail to recreational ORV riding is a "fair or better condition" (page 2-27), yet that standard doesn't seem to be applied to subsistence trails. NPS may want to address this inconsistency in its final EIS.	The difference is because of the different authorities used to authorize subsistence and recreational ORV use.
N072-25	The monitoring frequency standard for unimproved trails is not consistently discussed in each of the described three action alternatives (#3, #4, and #5); Alternative #3 suggests a frequency and #4 and #5 say nothing. As near as we can tell, by applying the standard for Alternative 3, the Draft EIS anticipates that monitoring of transects and qualitative observations along good and fair portions of the unimproved trails will be conducted every 3 years, (page 2-19). Because high runoff events, floods or periods of significant use may impact trails, monitoring may need to occur after these events to protect resources. We recommend this be revised to state "monitoring will occur on an as-needed basis, not to exceed every 3 years."	The monitoring frequency for unimproved trails, improved trails, and off-trail use has been changed to "monitoring will occur on an as-needed basis, not to exceed every 3 years" in the Final EIS. (Same response for N072-25, N072-26, N072-27, N072-35, N072-42, and N072-43).
N072-26	We recommend that unimproved trails in Degraded, Very Degraded or Extremely Degraded condition be monitored on an as-needed basis (e.g. following high-run off events, floods, or periods of significant use) not to exceed 1 year.	
N072-27	Given the highly variable climate in the region and the uncertainty in the amount of trail use, monitoring every 5 years is not likely to be frequent enough right after the trails are improved to capture trail degradation on improved trails occurring as a result of use as well as natural phenomena including high levels of run-off or flooding. In the first few years after a trail is fixed, we suggest this be revised to indicate that "monitoring will occur on an as-needed basis, not to exceed every 3 years." Once use patterns are set and initial data has been collected, this could be moved to 5 years in the future.	
N072-35	It is important to discourage off-trail usage in a manner that creates new trails. As with our other recommendations for monitoring, we suggest this be revised to state that monitoring will occur on an as-needed basis, not to exceed every 3 years.	
N072-42	Again, for unimproved trails we believe the NPS should conduct some level of monitoring of wetland dominated trails (i.e. Tanada Lake, Copper Lake and Suslota) on an as-needed basis (such as after heavy storm events) not to exceed three years for Good and Fair condition trails and one year for trails that are degraded.	
N072-43	For improved trails, we recommend initial monitoring every 3 years to insure protection of resource and investment.	
N072-28	Appendix B suggests that trail condition assessments (good, fair, degraded, etc.) will be done every 10 years. We would suggest that be revised to every 5 years.	These repeated assessments are intended to indicate long-term trend in trail condition, not necessarily resource impacts, so are adequate if they are done every 10 years.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-37	We would like to see Monitoring Trail Conditions every 5 years as indicated in Alternative 1 applied to all alternatives. Monitoring Trail Conditions every five years to determine change in trail condition classes (good, fair, degraded, v. degraded, ext. degraded) over time is important under all of the alternatives. Because only trails in Fair or Better condition would be open to recreational ORVs under the modified Alternative 4 we support, assessment is critical to meeting this standard. Further, monitoring Resource Impacts based on the Indicators and Standards on both Park and Preserve trails will only capture snapshots of the trail conditions at monitoring points. That is not a replacement for a monitoring Trail Conditions along the length of the trail which will help NPS determine if resource impacts are decreasing over time.	(Same response for N072-28 and N072-37).
N072-30	We believe that no increase in trail/disturbance width should be allowed in Wetlands. This is consistent with the NPS policy of "no net loss of wetlands (p. 1-21). As the Draft EIS states, ORV use is impairing wetlands. Any increase in Disturbance Width should result in a Management Action to prevent resource impacts by both subsistence and recreational ORV use. We recommend this because an increase of 5% on a trail that is already 100 feet wide represents nearly the proposed standard of a 6-foot disturbance tread (p. 4-45) for trails. An increase of 5% in a disturbed area 320 feet wide would be nearly three times the disturbance tread.	The moderate and minor impacts predicted to wetlands under Alternatives 3, 4, and 5 would not constitute a loss of wetlands. And the Draft EIS does not state that wetlands are being impaired, even under Alternative 2, which predicts major impacts to wetlands (page 4-41, Draft EIS). NPS contends that the monitoring standards/indicators proposed, when applied as described in Appendix B, give a good indication of the trend in extent and intensity of resource impacts associated with the trails.
N072-31	We suggest that Trail Width be included in the Vegetation resource section, as an additional measured indicator and the standard should be perhaps a quarter of the wheelbase of a standard ORV or some appropriate minimal increase.	Trail impact width will be added as an Impact Indicator under Vegetation in Table 2-2 of the Final EIS. The Standard and Action Level will be Disturbance width increases by greater than 5%.
N072-33	It is unclear why it would be acceptable for an improved trail to increase in width by 30% (~1.8 feet assuming a 6 foot disturbance tread). We recommend that the increase be limited to a quarter of the wheel base of a standard ORV or some appropriate minimal amount. Given the highly variable climate in the region and the uncertainty in the amount of trail use, monitoring every 5 years is not likely to be frequent enough to capture trail degradation on improved trails occurring as a result of use as well as natural phenomena including high levels of run-off or flooding. We suggest this be revised to indicate that "monitoring will occur on an as-needed basis, not to exceed every 3 years." This will help NPS protect both resources and its investment.	This standard is consistent with a similar monitoring standard developed for the "Cantwell Subsistence Off-Road Vehicle Management Environmental Assessment" done at Denali National Park and Preserve. The 30% allows for some settling and expansion of fill or hardening material used in trail improvement.
N072-36	Further, exposure of up to 50 feet of bare ground through perforation or removal of the organic mat is an unacceptably high level of impact. It may be difficult to deter use of such an obvious route even at a significantly less level of disturbance. We recommend this be scaled to be proportional to the average length of a permitted ORV wheel- or tracked vehicle turningbase, and an additional impact indicator of compressed vegetation be added, with a Standard and Action Level being vegetation compressed 75% below the average vegetation height (or an appropriate level of compression that would allow for natural recovery).	The intent of the identified standards for off-trail use is to minimize resource impacts associated with off-trail use. The standards identified in Table 2-6 of the Draft EIS will accomplish this. The standards are consistent with the Impact Threshold Criteria for Wetlands for a negligible or minor degree of impact (page 4-31, Draft EIS).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-40	By implementing a randomized design based on trail length rather than vegetation type, the most severely impacted wetland communities may not be represented in the sample plots, and assessing additional impacts to these communities is critical in reducing impacts over time. This monitoring is critical, in particular, on the Tanada Lake and Copper Lake Trails while the NPS waits funding for improvements...Once blocks by vegetation have been identified, a minimum of 3 blocks can be randomly chosen for dominant vegetation types along a trail and at least one in less common vegetation types. Within a block, a plot or plots would be randomly located to create 20 transects along the trail. Alternatively, trails could be blocked by condition (e.g. degraded) as a proxy for vegetation, insuring that the areas that are most susceptible to increasing impacts are represented in the monitoring program.	Monitoring transects laid out in 2008 along the Tanada trail using regularly spaced intervals based on trail length resulted in 15 of the 20 transects occurring in wetlands, with an average disturbance width of 69 meters and an average number of 12 braids. The methodology as described in the Draft EIS resulted in severely impacted wetland communities being well-represented.
N072-44	How will the baseline map needed to identify existing trails and formation of new trails over time be created? Aerial photographs may be the best source for this information, as documenting these on foot would be time consuming and incomplete.	Aerial photography and satellite imagery will be utilized, then field proofed on the ground.
N072-45	We would urge that some monitoring be developed to update the 1986 inventory, which may include ground or aerial based observations on an as-needed basis (e.g. evidence of significant use at trailheads), not to exceed every 5 years	These trails will be re-visited as part of the baseline mapping necessary to identify existing trails. The need for periodic monitoring of these trails will be assessed at that time.
N073-1	For all of the monitoring standards, both on and off trail, a statement is needed to clarify that the intent of the management actions is to keep access open for subsistence and other traditional activities.	NPS intent is clearly stated in the purpose statement for this planning effort, which is to "provide continued opportunities for appropriate and reasonable access to wilderness and backcountry recreational activities, which also accommodates subsistence and access to inholdings; while protecting scenic quality, fish and wildlife habitat, and other park resource values" (Draft EIS, page 1-1). The range of alternatives presented in the Draft EIS and the identification of Alternative 5 as the NPS preferred alternative also indicate that it is NPS intent to maintain existing access routes. The monitoring indicators and standards identified in Tables 2-2, 2-4, and 2-6 are intended to objectively measure resource impacts and prevent them from expanding. This monitoring is proposed to prevent the level of impacts from becoming unacceptable in order to maintain the ability of subsistence ORV users to continue to reasonably access subsistence resources. (Same response for N073-1 and N073-3)
N073-3	Closure should be the management action of last resort.	
N073-2	Management actions should be taken to address problem trail segments, not the entire length of a given trail.	Management actions would be applied to specific trail segments, where possible. For example, site-specific maintenance, identified as a management tool in Table 2-3 of the Draft EIS, would be applied to specific trail segments where standards are not being met. For other management actions, application to trail segments might not be practical. For example, closing the first segment of a trail would essentially close the whole trail.
N073-4	It is critical that the monitoring standards are implemented in the most objective manner possible. To facilitate this, it is very important that the measurement protocols be clearly defined and described.	A description of the monitoring protocols is included in Appendix B of the Draft EIS.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N073-5	Monitoring should be based over a five-year period, to account for natural variations in the environment, such as wet and dry years. In addition, monitoring results should be averaged over the total length of the trail and focus on changes in the overall character of the trail, rather than on individual trail segments.	Because of the highly variable climate, periods of high rainfall (such as those experienced in June and July of 2010), and the susceptibility of the unimproved trails to further degradation, the monitoring period will be every three years.
N073-6	With regard to the monitoring standards for unimproved trails, management action should be taken when five or more of the eight measured indicators exceed the monitoring standard. (Rather than three of eight.) This change will ensure that actions are based on the overall character of the trail.	The sentence on page 2-19 of the Draft EIS that states "For any specific trail, exceeding the standard on three or more of the eight measured indicators would result in management action to correct the problem" will be deleted. Instead the monitoring data will be summarized and assessed and "if monitoring indicates that standards are not being met and the magnitude or degree of resource impacts is increasing over time, action would be taken to address the problem through management of subsistence ORV use" (page 2-19, Draft EIS).
N073-7	With regard to the monitoring standards for off-trail ORV use for subsistence, management action should be taken when three or more of the five measured indicators exceed the monitoring standard. (Rather than one of five.) The focus of this monitoring should be on unacceptable resource impacts, rather than on any impacts.	The intent of the identified standards for off-trail use is to minimize resource impacts associated with off-trail use. The standards identified in Table 2-6 of the Draft EIS will accomplish this. The idea is to prevent impacts from becoming unacceptable impacts so that we can continue to allow off-trail use to occur.
N073-8	A definition of what constitutes a "new trail" is needed in relation to monitoring standards for off-trail ORV use.	Page 2-40 of the Draft EIS has been edited, under <i>Off Trail ORV use</i> to say "Subsistence ORV use off of existing trails is permitted as long as the use does not result in creation of new trails with resource impacts."
N075-19	Resource damage caused by NPS administrative motorized use of trails must be factored in when monitoring trail and evaluating resource damage. Administrative use must be closed prior to placement of any limitations on Subsistence access.	A section has been added in the Final EIS under Chapter 2, Section 2.3, Actions Common to all Action Alternatives that describes criteria for NPS administrative ORV use.
N075-20	Use of local volunteers when monitoring trails should be explicitly mandated in the ORV EIS...It behooves the NPS to take advantage of the wealth of local knowledge available to them. In addition, when people making use of resources are involved in management decisions, they will feel a greater sense of ownership and stewardship toward those resources.	NPS agrees that volunteers provide an invaluable service and their participation in trail monitoring would be beneficial. It won't be "mandated".
N076-2	Limited dispersed use is an effective management tool to assure that impacts are minimal over a broader area (i.e., effects are a "mile wide but only an inch deep" v. "an inch wide and a mile deep").	The Draft EIS states "Most wetland types are highly sensitive to disturbances from ORV use, and even limited ORV use in most wetland types can result in substantial and permanent impacts to wetlands (Ahlstrand and Racine, 1990)" (Draft EIS, page 4-37). Much of the analysis area is classified as wetlands (see Map 3-10, Draft EIS). Dispersed recreational ORV on unimproved trails or off-trails, particularly in wetland types, would result in resource impacts and would be inconsistent with NPS policy, Executive Order 11644, and 36 CFR 4.10(b).

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N078-24	We appreciate the DEIS identifies both standards and indicators for assessing damage to improved and unimproved trails, and management tool options to mitigate resource impacts. This will help assure consistency for users over time and under different park managers. We request a corresponding commitment to consultation with the State as part of that process. In addition, we recommend on-going consultation with the Wrangell-St. Elias Subsistence Resource Commission for implementation decisions affecting subsistence access	The State and the Wrangell-St. Elias Subsistence Resource Commission will be consulted as appropriate.
N079-2	With regard to trail monitoring, we recommend developing a monitoring/decision making committee that is not strictly comprised of NPS administrative personnel, but instead also involves the users of the park and ultimately provides equal balance between users and administrators	NPS intends to consult with interested stakeholders on decisions stemming from monitoring results.
N079-3	With regard to ALL monitoring standards, only when 75% or more of the measured indicators exceed the monitoring standards should any temporary restrictions or closures be implemented	Please see responses to comments #N073-6 and #N073-7.
N085-11	This is what the monitoring standards for Alts 4 and 5 management will require: if you create a trail, you then get to braid next to it. (p.2-28 and p.2-29, Tables 2.2 and 2.3)	Table 2-2 and 2-3 and the corresponding text in the Draft EIS show that monitoring of existing unimproved trails that shows an increase in resource impacts associated with the trail (including additional braids or increased width) would result in management action to correct the problem.
N097-2	Trail monitoring should also factor in subsistence animal populations. Animal populations fluctuate, and with it subsistence usage, meaning more travel in high animal population years and less or no travel when few or no animals are present	Assessment of monitoring data will take into account estimated level of trail use and weather conditions for the season in which the monitoring occurs.
N148-11	If conditions degrade certain trail segments, restrictions should apply only to those sections and not entire trails, where possible. And they should apply only temporarily until maintenance crews repair the area as promptly as possible and reopen the entire trail. Table 2-6 in Chapter 2, page 2-40 of the EIS outlines Off-Trail Indicators and Standards and states that if anyone of the indicators is exceeded, newly created trails will be closed. In truth, several indicators should be present before closures are mandated.	Management actions would be applied to specific trail segments, where possible. For example, site-specific maintenance, identified as a management tool in Table 2-3 of the Draft EIS, would be applied to specific trail segments where standards are not being met. For other management actions, application to trail segments might not be practical. For example, closing the first segment of a trail would essentially close the whole trail. The intent of the identified standards for off-trail use is to minimize resource impacts associated with off-trail use. The standards identified in Table 2-6 of the Draft EIS will accomplish this. The idea is to prevent impacts from becoming unacceptable impacts so that we can continue to allow off-trail use to occur.
Implementation and Priorities		
N015-3	Funding to repair or maintain existing trails will be difficult for Wrangell St. Elias Park & Preserve to obtain. Existing trails may not be repaired for decades due to lack of funds. In the mean time, trails may be restricted or partially closed because of damaged or ruined trails. This will cause a negative affect on the subsistent harvest of wild game, and the data of wild game records.	NPS will apply for funding to fix trails. In the meantime, NPS will continue to work with subsistence users through the Wrangell-St. Elias National Park and Preserve Subsistence Resource Commission, to continue to allow reasonable access to subsistence resources. Please look at the project's stated purpose (page 1-1, Draft EIS) and Alternative 5 (the NPS preferred alternative in the Draft EIS) to see that it is NPS intent to maintain existing access routes, not close them.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N016-1	For aesthetic and conservational reasons every effort should be made to manage each of these ORV trails in a maintainable condition, as defined in the Draft EIS 2.3 Actions Common to all Action Alternatives.	We agree. Please see Alternatives 4 and 5 of the Draft EIS, which propose to improve most of the trails to at least a maintainable condition.
N016-2	AOC recommends that a timetable for completion of trail upgrades and guarantees of funding be part of the ROD.	We can't guarantee funding. However, we will apply for funding and seek prioritization of trail funding in the ROD.
N016-3	No new trails should be constructed until upgrades and/or rerouting of the 116 miles of currently inventoried trails are at Service approved Maintainable Conditions.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it. (Same response for N016-3, N033-2, N072-13, N072-15, N073-11, and N073-12)
N033-2	I would like for the repair of new trails begin before the new ones are started. Repair the existing trails and rerouting should take place before new trails are established. Also Tanada Lake is the largest lake on Nabesna Road should be repaired first.	
N072-13	The proposed work to the Lost Creek, Trail Creek, Caribou Creek trails, improvements to the subsistence trails (Pass Creek and Goat Creek) in the Wilderness south of Tanada Lake, and the Soda Lake reroute will not require huge financial investments or additional environmental analysis. We encourage NPS to move ahead on these projects as soon as possible.	
N072-15	As such, some form of trail improvement priority needs to be developed and explained in the Final Record of Decision.	
N073-11	In carrying out trail improvements the following priority order is recommended: 1. Improvements that keep trails open to subsistence use. 2. Improvements that allow trails to be re-opened in support of traditional activities such as general hunting and fishing by other Alaska residents. If it is not possible to re-open the entire trail, please work on at least opening portions thereof. 3. Improvements that support recreational access to the park and preserve more generally. 4. New construction. All trails improvements should be completed prior to any new construction.	
N073-12	The development of non-motorized trails and routes should only occur after the ORV trail improvements are completed and recreational ORV use is reinstated.	Estimated trail-by-trail costs will be included in the Final EIS in Table 2-1. Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.
N017-20	There is a significant lack of cost figures in the document. Page 2-20 shows the total cost of each alternative, but there is no breakdown regarding the total cost of motorized versus non-motorized projects, nor are the costs of each individual project provided. This is a critical flaw. Similarly, there is no estimate of the time each project will take to complete. Consequently, it is impossible to determine whether the projects can be completed for a reasonable cost; whether non-motorized projects are receiving a fair share of both labor and money; and in what order the various projects should be undertaken (regarding this latter issue, there doesn't seem to be anything in the document that explains the Park Service's intent).	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N017-21	We recommend, in order to treat both user groups fairly and provide needed balance, that the Service complete at least (since the costs in time and money are likely to be far less for non-motorized projects) one non-motorized project for each motorized one. More basically, an implementation plan should be prepared and provided to the public for review and comment.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it. There will be no implementation plan; however, WRST will publish newsletters discussing implementation progress.
N020-1	I believe that trail restoration makes more sense than re-routing trails. Trail restoration addresses both environmental concerns and public egress. The use of bio-degradable local organic materials, while cost effective, can be labor-intensive. If labor issues can be mitigated by local volunteers, then this option serves local users, visiting tourists and the Park Service management plans.	For the trails discussed in the Draft EIS, re-routing is prescribed over trail restoration or hardening, when feasible, because re-routing gives us the opportunity to put the trail in locations with more durable soils, and allows us to incorporate design features of sustainable trails (see Appendix C of the Draft EIS). The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.
N020-2	Trail hardening and tread improvement can be affected by use of spruce log bridging and silt/sand bagging. Willow (live stake) is very effective for trail shoulders and in damaged-braided areas because willow is both readily available and fast growing.	Use of native materials for small stream crossings will be considered where these materials are readily available. No re-planting of vegetation is proposed at this time because old trail braids that are no longer used by ORVs have shown the ability to re-vegetate without active restoration measures (see page 4-43, Draft EIS, for example).
N020-3	Affordable options are critical in these economically stressed times. Use of biodegradable products are esthetically pleasing in the long run, while use of expensive, non-biodegradable products are not cost effective in this environment. Cost Estimates, as of 11/01/10: Log bridging for a 20' L x 10' W section - approximately \$250 (Regal Sawmill). Felt leaf willow "live stakes" - \$1 -25 each, estimate. 4# silt/sand bags (biodegradable gunny sacks) - based on logistics/volunteer support available. grass seed - TBD	Use of different trail hardening materials, including biodegradable (such as wood corduroy) have been evaluated in Wrangell-St. Elias National Park and Preserve (see Meyer, K.G. 2002. Managing degraded off-highway vehicle trails in wet, unstable, and sensitive environments, page 6-6, Draft EIS). In general, use of corduroy can be a less expensive alternative to other hardening material, but its use is highly dependent on native material being readily available. Additionally, it does not last as long as other trail hardening applications.
N033-3	Prior to trails reopening please allow volunteer groups to do spot repairs. This will offset cost and speed repair projects.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.
N035-1	I support issuing special use permits to property inholders to access their cabins/camps with special provisions for making necessary trail improvements.	The process you support is already in place. Please see section 1.8.2, page 1-27 and the section on ORVs for Accessing Private Inholdings on page 2-7 of the Draft EIS.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N035-2	I support encouraging volunteer efforts by local residents to help make these improvements.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment. (Same response for N035-2 and N039-1)
N039-1	Regardless of which alternative is put into place, there has to be an effort to get subsistence users directly involved in the maintenance of the trails they use.	
N051-3	A fostering of co-management and power sharing should be designed to maximize resource protection and sustainable use. The Nabesna region can be resilient and the use of trails can be sustainable if managed in a way that the local users become protectors and embrace the power of co-management. I would strongly urge WRST to develop a process where local individuals and groups can be involved in the management, volunteer to work to improve trails and come to develop a sense of ownership and pride of sustainable use of resources.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor. Additionally, partially as a result of this EIS process, a citizens group has formed in the Slana area. This group took the time to educate themselves and submit consolidated comments on the Draft EIS and they are interested in continuing a dialogue with WRST as we get into the implementation phase of this project. WRST has suggested regular meetings with representatives of this group.
N058-1	Also the repair period of trails could take a long time and closing trails would be devastating to land owners.	ORV use for accessing inholdings is permitted under a different authority than subsistence and recreational ORV use. NPS has process and procedure in place regarding access to inholdings. Please see the response to comment #N035-1.
N069-6	Moreover, sufficient enforcement is likely to be lacking, which will aggravate the impacts resulting from the ORV use on these trails. Therefore, we question how this alternative can be labeled as the environmentally preferred alternative. This is particularly true in view of recent Federal Court decisions that point out similar instances where the National Park Service has not followed its own laws and policies in making decisions related to off-road vehicles.	Our evaluation of which alternative to select as preferred assumed that trail improvements as proposed would occur and that sufficient enforcement (where needed) would occur. To respond to your point about the preferred alternative being consistent with NPS laws, regulations, and policies. Approximately 1/2 of the existing ORV use in the analysis area is related to subsistence (see Table 4-1 of the Draft EIS). Section 201(a) of ANILCA states, "Subsistence uses by local residents shall be permitted in the park, where such uses are traditional in accordance with the provisions of Title VIII" (Draft EIS, page 1-7). The WRST General Management Plan in 1986 made the determination that ORVs were a traditional means of access for subsistence purposes (page 1-23, Draft EIS). Consequently, part of the purpose of this project is to accommodate access for subsistence (Draft EIS, page 1-1). Doing so without trail improvement would result in continued trail degradation and resource impacts, as described in the Draft EIS under Alternative 3. This is summarized in the Draft EIS in section 2.7, page 2-41.
N072-5	Furthermore, we see a variety of outreach and interpretation opportunities, for the Park Service, including: Educate park visitors about the region's diverse cultural landscape and the contemporary wilderness living of those local residents that have chosen to live a rural lifestyle. This is unique in America and should be embraced. Develop educational materials that highlight NPS expectations for responsible ORV trail use and park resource stewardship.	We agree that education is important.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-6	What will happen if the necessary funding is not fully realized? The Park Service must seriously consider the likelihood of limited funding opportunities in crafting a realistic, implementable and enforceable final Nabesna ORV Trails Management Plan.	NPS is committed to pursuing the funding needed to fix trails. And we feel that trail improvement projects associated with this project will compete well because 1) they provide for resource improvement; and 2) they allow impacted wetlands to recover. If we are not able to obtain full funding than NPS will continue to monitor unimproved trails and work with the local Subsistence Resource Commission and subsistence users to ensure that resource impacts associated with degraded trails do not expand. This includes local participation and education in trail monitoring and an understanding of the degree of impacts that would compel NPS to restrict or close trails. (Same response for N072-6, N073-28, N074-1, and N075-7)
N073-28	We are concerned that trails could be closed to subsistence ORV use due to lack of funding for repairs. We urge you to consider language in the final alternative that would not put subsistence users in a position where there would be loss of access to food security.	
N074-1	In order for that to become the reality we believe needs to take place, the NPS must show a strong commitment to acquiring the funding and pursuing the necessary remedial action to ensure the continued use of the trails in question. Without such a commitment, it is our considered opinion that the NPS will have failed to live up to the intent of ANILCA to provide for traditional uses in our Alaska Parks and Preserves.	
N075-7	In the event that funding for trail improvements is delayed or is not secured during the life time of this EIS the ORV EIS must address how temporary closures impacting subsistence access and initiated in response to resource damage do not become de facto permanent closures.	
N072-14	Yet it is unclear from the data presented in the DEIS (cost figures only appear in one place – table 2-1, page 20) what the cost is for each trail. We would encourage the Final EIS to provide cost projections for each proposed trail improvement.	Trail-by-trail estimated costs will be added to Table 2-1 in the Final EIS.
N072-18	Should monitoring find that impacts are continuing, then NPS should apply Table 2-3 and engage local residents in a problem-solving dialogue about how best to address the impacts. In addition to the management tools listed in Table 2-3, understanding the amount of use trails are receiving will be important in managing to decrease impacts over time. We encourage the NPS to work with users to better document trails use.	NPS is committed to pursuing the funding needed to fix trails. And we feel that trail improvement projects associated with this project will compete well because 1) they provide for resource improvement; and 2) they allow impacted wetlands to recover. If we are not able to obtain full funding than NPS will continue to monitor unimproved trails and work with the local Subsistence Resource Commission and subsistence users to ensure that resource impacts associated with degraded trails do not expand. This includes local participation and education in trail monitoring and an understanding of the degree of impacts that would compel NPS to restrict or close trails. The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor. Additionally, partially as a result of this EIS process, a citizens group has formed in the Slana area. This group took the time to educate themselves and submit consolidated comments on the Draft EIS and they are interested in continuing a dialogue with WRST as we get into the implementation phase of this project. WRST has suggested regular meetings with representatives of this group.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N072-22	We recommend that the EIS also indicate a weight limit for fully-loaded vehicles and trailers, as the overall weight can have as much of an impact on trails as the type of vehicle.	Vehicle weight limits (including trailers) will be added under "Vehicle Class Restrictions" in Table 2-3 as a possible management tool in response to monitoring.
N073-9	The administrative use of ORVs should be monitored and documented. Subsistence use should be a higher priority than administrative use.	A section has been added in the Final EIS under Chapter 2, Section 2.3, Actions Common to all Action Alternatives that describes criteria for NPS administrative ORV use. We will not prioritize subsistence vs. administrative use but instead will manage each consistent with law, policy and regulation.
N073-16	The draft EIS did not explain the process for allocating recreational ORV permits in the event that permit numbers need to be reduced. We recommend adding a description of how permits would be allocated	The process for allocating recreational ORV permits in the event that permit numbers need to be reduced will be added to Table 2-5 in the Final EIS, under "Limitation of Recreational ORV Use".
N073-26	A mechanism to utilize volunteer labor for trail restoration and improvement should be adopted and put into place immediately. This could significantly impact expeditiously executing trail improvement for the Nabesna region.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.
N075-6	Our greatest fear as a community is that funding to address the access and conservation goals of the EIS will be inadequate or simply will not be provided by Congress and the DOI. Further, we ask that WRST NP management use base funds allocated to the trail program to address trail maintenance issues in the Nabesna area that have been ignored for 30 years or were constrained because of litigation.	NPS is committed to pursuing the funding needed to fix trails. And we feel that trail improvement projects associated with this project will compete well because 1) they provide for resource improvement; and 2) they allow impacted wetlands to recover. If we are not able to obtain full funding than NPS will continue to monitor unimproved trails and work with the local Subsistence Resource Commission and subsistence users to ensure that resource impacts associated with degraded trails do not expand. This includes local participation and education in trail monitoring and an understanding of the degree of impacts that would compel NPS to restrict or close trails. Additionally, Wrangell-St. Elias National Park and Preserve currently receives no base funding to support a trails program. The park has submitted a base funding proposal for a trails program. Money that currently supports funding of a trail crew is tied to specifically requested and funded projects.
N075-21	Any administrative action that results in a limitation to access should be enforced in the following order: 1. Non-hunting recreational use 2. hunting recreation use 3. Administrative use 4. Subsistence Use	As described in the Draft EIS, when needed, restrictions to motorized access are applied to recreational ORV users first. We will not prioritize subsistence vs. administrative use but instead will manage each consistent with law, policy and regulation.

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N075-22	Prioritizing Trail Improvements: First priority should be improvements that keep access open to subsistence users and address safety issues, i.e. the Tanada Creek crossing on the Copper Lake Trail. Second, improvement to trail that impact private property (soda lake and reeve's field). Third, existing motorized use trails. Fourth, New construction including non-motorized trails and routes.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.
N075-23	The NPS should state its plan for issuing Recreation ORV permits in the future, how the terms and conditions of the permits will be enforced and how efforts to educate all users as to the regulations and ways to operate ORVs consistent with regulations, stewardship of resources and with respect to local subsistence users and private property owners will be increased.	The "plan" for issuing recreational ORV permits is described on page 2-7 of the Draft EIS. Education has been and will continue to be part of NPS strategy for managing ORV use. Wrangell-St. Elias National Park and Preserve currently has information available about trail and weather conditions available on their website. Additionally, educational materials such as "Tread Lightly" information are handed out with ORV permits. WRST currently has two proposals in the NPS budget system that would fund educational efforts geared towards ORVs. One of those would produce a video informing potential ORV permittees about riding techniques to minimize trail damage.
N078-1	In the interest of protecting fish habitat and preserving these important recreational and subsistence opportunities, the State – in particular the Alaska Department of Fish and Game (ADF&G) – is available to assist the Service in its efforts to secure labor, funds and equipment to improve the trail system.	Thank you. NPS will be exploring all funding opportunities.
N078-3	Work with stakeholders, including the State, to develop priorities for spending trail improvement funds.	We have considered the public comments on this Draft EIS in consideration of how and when we request funding for each project. Please see the response to comment #N016-3. We will continue to work with stakeholders as we phase into implementation through annual newsletters and consultation with interested groups, individuals, or agencies.
N078-4	Until funding is fully secured for trail improvements, which the DEIS estimates will take 10-15 years, the park will have discretion to open and close trails to federal subsistence users, either in part or in full, while maintaining closures of unimproved trails to recreational users. To reduce any subjective incentive to avoid or restrict funding, and to facilitate greater interim use, we recommend the park continue to assess alternative means to maintain motorized access for both subsistence and recreational users. For example, short-term trail maintenance or re-route efforts, combined with more stringent weight restrictions or weather-dependent closures could effectively extend use while funding is sought for higher quality, long-term solutions.	NPS is committed to pursuing the funding needed to fix trails. And we feel that trail improvement projects associated with this project will compete well because 1) they provide for resource improvement; and 2) they allow impacted wetlands to recover. If we are not able to obtain full funding than NPS will continue to monitor unimproved trails and work with the local Subsistence Resource Commission and subsistence users to ensure that resource impacts associated with degraded trails do not expand. This includes local participation and education in trail monitoring and an understanding of the degree of impacts that would compel NPS to restrict or close trails. To continue to permit recreational ORV use on unimproved and degraded trails would be

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Letter ID - Comment ID	Substantive Comment	NPS Response
N080-1	Given the estimated 10–15 year timeframe for completion of all proposed trail improvements, we are concerned about the continuation of existing restrictions on recreational users and the increased potential for restrictions on subsistence users. According to the DEIS, until trail improvements are done, recreational ORV use would only be permitted on trails in fair or better condition. We encourage the NPS to consider interim measures that could restore degraded trail segments to useable condition until such time as funding is provided for final permanent improvements	inconsistent with NPS policy and Executive Order 11644. Recreational ORV use on unimproved trails, as documented in the Draft EIS, would lead to "adverse impacts on the area's natural, cultural, scenic, and esthetic values". NPS would not consider permitting recreational ORV use on existing degraded trails under 43 CFR 36.11(g)(2), based on the analysis in the Draft EIS, which concludes that recreational and subsistence ORV use on unimproved trails would lead to major impacts to soils, vegetation, and wetlands. (Same response for N078-4 and N080-1).
N078-5	We recommend the final plan clearly identify how the Service will prioritize trail improvements	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.
N078-6	Furthermore, the evolution of open and closed trails and availability to specific user groups may influence wildlife management issues such as hunter displacement. For this reason, we request that, prior to establishing priorities, the Service work with ADF&G to identify potential wildlife management issues associated with individual trails.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it. We can prioritize which trails we request money for but we will probably not receive money in the order in which we requested it (because of several factors, including anticipated cost and different funding sources). Coordination with ADF&G will continue as we phase into implementation for this project. Exceptions to the funding priority rankings will have to be made. (Same response for N078-6 and N078-10)
N078-10	Exceptions to the funding priority rankings could be made if dedicated funding from an outside source is targeted to a particular trail or user group	
N078-7	In addition, we recommend prioritizing improvements on existing motorized trails over constructing new non-motorized routes and trails.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.

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N078-9	While the DEIS is not clear whether recreational <i>non-motorized</i> trail users will also be assessed a fee, it is clear that fees paid by recreational users of existing motorized trails will be used to offset the cost of motorized trail improvements. We therefore recommend giving existing motorized trail improvements a higher ranking, which will also serve to restore historical recreational use before facilitating additional new use	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N078-28	If determined necessary, the Alaska Board of Game could implement restrictions to reduce associated hunting pressure, e.g., restrict hunting bag limits, methods, or means. Furthermore, if federal subsistence hunting were to cause a biological concern in this area, ADF&G would pursue similar restrictions through the Federal Subsistence Board	We agree. Please see the Draft EIS, page F-5, last paragraph.
N078-32	It appears that all the proposed re-routes in the DEIS can be performed through an administrative action by the State.	This comment refers to proposed re-routes of State-asserted RS-2477s. NPS will consult with the State prior to implementation of these projects.
N079-4	On any administrative restrictions imposed that would limit access and/or resource utilization, the order of enforcement should be: (1) non-hunting recreational use, (2) non-recreational use by those who are not federally qualified subsistence users, (3) administrative use, (4) federally qualified subsistence users	As described in the Draft EIS, when needed, restrictions to motorized access are applied to recreational ORV users first. We will not prioritize subsistence vs. administrative use but instead will manage each consistent with law, policy and regulation.
N079-6	When trail improvements are considered for implementation, the order of priority should be (1) maintain access for subsistence users and private inholders, and (2) maintain access on existing motorized use trails for all other users	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.
N079-7	The efforts of volunteer work forces should always be accepted and utilized for trail repairs, whenever available	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.
N079-8	Trail work should be limited to the minimum repairs necessary to maintain access, rather than to initiate upgrades and improvements	Trails will be repaired to at least a maintainable standard, as described in the Draft EIS (page 2-2) in order to minimize resource impacts associated with degraded trails.

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Letter ID - Comment ID	Substantive Comment	NPS Response
N080-3	The final management plan should look at ways to prioritize trail improvements projects to direct available funding where it will provide the most benefit. Motorized trails should be given the highest priority and no new non-motorized trails should be constructed until such time as all existing trails are improved to at least a maintainable condition	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.
N081-15	There is a serious lack of information about how the Park Service intends to implement its preferred or other alternative. Not provided are the cost of each motorized and non-motorized project, where the money to do them will come from and when it's likely to be available, how long it might take to complete each of the projects, and in what order it is proposed to undertake them. Since the DEIS lacks all of this essential information, an implementation plan should be added to the final Plan/EIS, and the public should be given an opportunity to review and comment on that plan	Estimated trail-by-trail costs will be included in the Final EIS in Table 2-1. Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it. Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. There will be no implementation plan; however, WRST will publish annual newsletters discussing implementation progress.
N092-3	As far as cost maybe a trail permit fee could help pay a small amount of the cost to repair and maintain the trails.	Based on public comment and examination of the costs of a fee collection program, the NPS has determined that a fee program will not be implemented as part of any of the alternatives considered in the Draft or Final EIS. The NPS may consider fees as an option at some later date, if the amount of use would justify the cost of administering a fee collection program.
N097-3	Focus improvement on trails that need the most improvement and access the greatest area ie: Tanada Lake, Copper Lake, etc. This helps spread use over more area, causing less impact	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.

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N097-9	Work with responsible trail users and organizations to develop a plan for trail improvements that insures reasonable access on existing trails. This is imperative to sustained subsistence use with minimal impact.	The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor. Additionally, partially as a result of this EIS process, a citizens group has formed in the Slana area. This group took the time to educate themselves and submit consolidated comments on the Draft EIS and they are interested in continuing a dialogue with WRST as we get into the implementation phase of this project. WRST has suggested regular meetings with representatives of this group.
N098-4	Trails north of the Nabesna Road should be prioritized for stabilization and hardening	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.
N099-7	Sixth, no plan will work unless it is adequately funded and enforced and this one is no exception. NPS must be able to secure the necessary funding to restore and relocate trails and to have sufficient personnel to monitor and enforce the plan, otherwise trail degradation will continue to occur and NPS could be forced to curtail the permitting of subsistence based ORV and ATV use as their only means to protect park and preserve wildlands from further damage.	NPS is committed to pursuing the funding needed to fix trails. And we feel that trail improvement projects associated with this project will compete well because 1) they provide for resource improvement; and 2) they allow impacted wetlands to recover. If we are not able to obtain full funding than NPS will continue to monitor unimproved trails and work with the local Subsistence Resource Commission and subsistence users to ensure that resource impacts associated with degraded trails do not expand. This includes local participation and education in trail monitoring and an understanding of the degree of impacts that would compel NPS to restrict or close trails.
N103-1	If you don't have the will or money to do the improvements then leave it open to motorized use.	We have the will to do the improvements, we think we can get the money to do the improvements, and if the improvements are not done, unimproved trails will be closed to recreational ORV use (unless they are in fair or better condition).
N113-1	We have lots of examples of hundreds of thousands of taxpayer dollars spent fixing and fixing again damage done by illegal ORV activities. Rules and maps are not enough to protect our public lands; we must have enforcement and monitoring on a regular visible basis.	We agree with the second portion of your comment.

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N142-1	My experience with other trails incorporating sustainable design and hardening for ORV use has been very positive. After the initial noise and mess of construction the visual impact of a single route, though perhaps partially covered with Geo-Block, is far less negative than a rutted, ripped-up wet meadow or a 5-footdeep trench to exposed mineral soil and subsurface boulders. After just five years improved trail sections take on a more natural appearance, with vegetation able to recover and blend over the constructed portions. An added benefit, however minor, is reduction in noise disturbance when users can bypass or travel quickly over hardened wet sections rather than spending additional time and fuel (often with multiple machines) extricating themselves from unmanaged muck-holes. Designated stream crossings would eliminate (or significantly reduce) unsightly, sharply eroding drop-offs that exist now; and with a consolidated route for travel new crossings would not have to be "pioneered."	We agree. Thank you for the support for fixing trails.
N145-3	We urge NPS to set priorities in allowing ORVs in the Nabesna District. The highest priority should be to make the trails usable and sustainable for the ORV uses clearly authorized by ANILCA: subsistence uses and legal access to private property. Recreational ORVs in the national preserve should be limited to numbers and seasons that will not lead to degradation of lands and waters. If you fail to set limits, recreational ORV trips will likely multiply and overwhelm any rehabilitation or maintenance work contemplated in the EIS.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it. In response to your comment regarding setting limits for recreational ORV use, the monitoring standards, indicators, and management actions displayed in Tables 2-4 and 2-5 of the Draft EIS set a physical capacity for improved trails.
N146-2	When hardening/re-aligning trails, costs must be evaluated against potential use levels. The lowest level of construction should be used that will achieve the needed effect.	Trails will be repaired to at least a maintainable standard, as described in the Draft EIS (page 2-2) in order to minimize resource impacts associated with degraded trails.
N146-3	Of prime import is to consider future maintenance feasibility and costs and a method installed to annually fund future maintenance needs so that we don't end up with yet another new facility that will degrade to a dilapidated state due to unfunded maintenance needs.	Cyclic maintenance needs are taken into consideration in funding requests for trail improvement or construction.
N146-4	A trail-by-trail evaluation should be conducted (already done?) to determine which trails would most benefit from the first hardening/reconstruction efforts, and the current use re-directed to other areas least likely to suffer further damages from that increased level of use.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it.

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N148-7	Any restriction to subsistence use should happen only after all other remedies have been exhausted. Isn't the whole point of this project to improve the trails to a maintainable standard so that all users can utilize the trails? Then, why concentrate on methods for closures and restrictions?	NPS intent, as demonstrated by the stated purpose of this project (page 1-1, Draft EIS) and the identification of Alternative 5 as the NPS preferred alternative in the Draft EIS, is to maintain existing trails, not close them. The monitoring/management actions proposed in Chapter 2 are a necessary measure to prevent expansion of impacts associated with unimproved degraded trails and thus try to provide continued use of these trails by subsistence users.
N148-8	Table 2-3 on page 2-21 of the EIS lists tools used to manage subsistence ORV use from least to most restrictive (closures). This table is qualified with the statement, (there is)"...no requirement that the tools must be tried in the listed order and a failure elicited before trying the next one." To us, this means that NPS could go straight to closures without even an attempt at repair. This defeats the whole process and alienates users from the agency. ANILCA 810(a)(3)(C) statesReasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such (management) actions." Closures have high adverse impacts on subsistence users.	The statement you refer to is included in the Draft EIS so that our hands are not tied to a particular sequence of management actions. Please see the response to comment #N148-7. It is NPS intent to maintain existing access routes to subsistence use, not close them.
N148-10	We feel that all old trails should be repaired before any new trail construction begins. Realistically, maintenance of the repaired trails will be the most crucial component in keeping the trails at a sustainable level. All Alaskan trails need some maintenance annually. We suggest that WRST allocate funds annually specifically for unanticipated and scheduled repairs, and assemble a workforce of volunteer trail workers in the area. Perhaps a method could be developed for users to report problem areas, and workers could be dispatched to make repairs before conditions become unfavorable. Closures, which represent a breakdown of the process, should then be unnecessary.	Projects that repair existing motorized trails and thus correct resource problems will be requested first, followed by minor repairs to motorized trails, followed by new construction of non-motorized trails. However, because funding requests vary by cost and by different funding sources, money may become available out of sequence. So, the year for which we request funding for a project may not be the year we receive the money. As a result, the public may see us building a non-motorized trail prior to fixing a degraded motorized trail simply because we didn't receive the money as we requested it. Additionally, cyclic maintenance needs are taken into consideration in funding requests for trail improvement or construction. The NPS will consider the use of volunteers for trail repair and maintenance. The level of trail reconstruction proposed in Alternatives 4 and 5 of the Draft EIS will not be hand crew work but instead will need to be done utilizing specialized equipment, such as excavators or small dozers. However, there are some components of the work that will involve hand labor (such as brush clearing, installation of porous pavement panels, or construction of bridge decking) that would be appropriate for volunteer labor.

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N148-16	Approximately 1.2 million dollars was budgeted for the preparation of the Nabesna ORV EIS, although NPS claims they are under budget. However, NPS tells us that before any work can proceed on the ground, other NEPA Environmental Assessment (EA) documents will have to be prepared. We cannot imagine that anything could possibly have been overlooked in this SOO-page study, or that further study is necessary. How much more taxpayer money will be spent on studies? The cost of this EIS could have provided almost a third of the cost of implementing Alternative 5 with concrete, actual physical work on the ground accomplished as a result. End the studies! Find a way to use a categorical exclusion or a reference to this EIS to avoid duplication of effort, to save taxpayer money, and get to work on the important part, fixing the trails!	In many cases, we will be able to tier off of this EIS and minimize the NEPA compliance that will be needed to implement the proposed trail improvements. Depending on the proposed trail construction or reconstruction, some projects may need some site-specific cultural resource clearance or more detailed prescription/design work.
N148-18	And we hope WRST aggressively pursues funding to implement the repairs as quickly as possible, as well as funding for future maintenance.	That is our intent.
Other		
N007-5	That said, if you can not find the political capital and will to do the right thing at this point in time I would rather you do nothing at all. Validating recreational ORV use through adopting Alternative 5, at the expense of several of the core purposes and values of WRST is simply the wrong thing to do.	The No Action alternative would result in an increase in impacts associated with degraded trails and the eventual loss of access to recreational ORV use and restrictions and possible closures to subsistence ORV use.
N017-12	More than once, the DEIS talks about "considering" new non-motorized trails and routes (see, e.g., 4-29). But improvements to motorized trails are proposed without qualification. What is the explanation for this difference, which would seem to unfairly favor improvements to motorized trails over new non-motorized trails and routes?	The analysis in the Draft EIS demonstrates that in order to continue to provide motorized access, even if only to subsistence users or those accessing inholdings, existing trails need to be improved. Without improvements, resource impacts associated with existing degraded trails would expand. In order to accomplish resource protection objectives described in Chapter 1 of the Draft EIS and provide reasonable access, it is necessary to improve trails. Construction of new non-motorized trails, while providing increased and enhanced recreational opportunities, does not address the need to correct resource impacts.
N023-1	I oppose the park's precedent-setting action found in preferred Alternative #5, which would allow recreational ORV use on trails in Wrangell-St. Elias National Park.	Based on public comment on the Draft EIS, the Final EIS analyzes a sixth alternative which combines elements of Alternatives 4 and 5 of the Draft alternative. It proposed to fix trails to a maintainable standard, but would not permit recreational ORV use on improved trails in the national park portions of Nabesna District.
N060-4	Do not create a discriminatory land use system, the resource belongs to all of us equally.	ANILCA affords subsistence users a priority in times of shortage. Eligibility requirements for federal subsistence are described on page 3-68 of the Draft EIS. Changes to the Federal Subsistence Regulations are outside the scope of this EIS (Draft EIS, page 1-15). (Same response for N060-4, N062-2, N125-2, and N127-1)
N062-2	I think that everybody should be equal why should one group of people be able to use the area and other people can't just because they live a few hundred miles away.	
N125-2	Trapping, hunting and fishing should also be allowed for all citizens not just the selected local subsistence residents. We all pay Federal taxes and thus we should all be allowed to access the Park.	

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N127-1	I do not support creating separate user classes to determine access. To the extent public monies fund these improvements, the public should be able to access these areas equally without prejudice.	
N061-1	Any hunting that involves harvest of meat is at least in some way a subsistence hunt	Eligibility requirements for federal subsistence are described on page 3-68 of the Draft EIS.
N068-9	In its present condition without substantial revisions, we question the relevancy of the EIS and it's open to the question of whether or not the EIS actually constitutes a danger to the future uses of these resources to Cheesh'na.	Your comment is hard to respond to without knowing what specific resources you feel are in danger. The analysis in Chapter 4 of the Draft EIS concludes, for Alternatives 4 and 5, that impacts to wildlife and subsistence would be moderate. The ANILCA 810 analysis concludes that none of the alternatives considered in the Draft EIS would result in significant impacts to subsistence resources or access to subsistence resources.
N072-51	Under an enhanced range of alternatives, Alternative 3's prohibition on recreational ORV use, plus moderate investment in trail improvements for legitimate purposes, would likely result in fewer projected environmental consequences than either Alternatives 4 or 5 and as such would have warranted Alternative 3's selection as the plan's environmentally preferred alternative.	Based on public comment on the Draft EIS, the Final EIS analyzes a sixth alternative which combines elements of Alternatives 4 and 5 of the Draft alternative. It proposed to fix trails to a maintainable standard, but would not permit recreational ORV use on improved trails in the national park portions of Nabesna District.
N078-43	Page 6-1, Bibliography: We found no mention of the 1995 ADF&G study of pre-ANILCA traditional access in the park " <i>Documenting Traditional and Subsistence Access in Wrangell-St. Elias National Park and Preserve</i> " by Terry Haynes and Stan Walker. This comprehensive report was compiled in consultation with, and with technical support from, the National Park Service, and provides substantiation of statements such as the first sentence of the last paragraph on page 1.2	" <i>Documenting Traditional and Subsistence Access in Wrangell-St. Elias National Park and Preserve</i> " will be listed in the Bibliography of the Final EIS.
N079-11	In conclusion, we believe it is critically important to circulate the next version of the EIS for public comment prior to finalization, and we look forward to that review process.	The Final EIS will be made available for a 30-day public review, but NPS will not respond to comments.
N085-25	This is the only unit in the NPS where ORVs are allowed to travel on every square inch of the unit, much less on every square inch of the unit's designated wilderness and eligible wilderness. This is not a sustainable situation for the resource values to be protected in a park and wilderness. Are there no management plans for ORV use off-trail except that "we're not going to let it get too bad?"	Yes. Under all alternatives, recreational ORVs would be required to stay on designated trails. Alternative 5 of the Draft EIS and Alternative 6 of the Final EIS both proposed designation of trails in the wilderness for subsistence ORV use and they both propose monitoring of off-trail use by subsistence ORV users.
N085-26	Table 3-18 does not include use on the "Trails south of Tanada Lake," as shown in Table 3-5.	Table 3-5 shows estimated round trips. Table 3-18 displays permit data. The trails south of Tanada Lake are not listed on the optional permits issued to subsistence ORV users.
N097-1	ORV use becomes even more vital as individuals grow older and their bodies decrease in physical ability. The ability to pack long distances when 20- 30 years of age changes significantly when one is 50-60. The banning of ORV use for game retrieval/access results in age discrimination	The Draft EIS presents a range of alternatives, including a preferred alternative that proposes to fix trails and permit recreational ORV use on designated trails. NPS is going above and beyond any definition of "reasonable" to provide continued access, on existing and proposed routes and trails, that will provide access for recreational

Table 5-1. Comments on the Draft Plan/EIS and NPS Responses, Organized by Impact Topics and Other General Categories

Letter ID - Comment ID	Substantive Comment	NPS Response
N104-1	Please remember there are handicapped people that need access also. With an a.t.v. they can enjoy the great outdoors with all of us	opportunities, subsistence, and access to inholdings, both motorized and non-motorized. (Same response for N097-1, N104-1, and N119-1)
N119-1	Not everyone is physically capable to hike for many miles. They should be able to enjoy and utilize the trails using ORVs.	
N144-2	In general, the whole DRAFT Nabesna ORV Management Plan is very slanted toward an unnecessary loss of outdoor opportunity for all user groups EXCEPT non-motorized users.	We disagree. Please see the stated purpose of this planning effort on page 1-1 of the Draft EIS. Additionally, please read Alternative 5, identified in the Draft EIS as the NPS preferred alternative, which proposes to fix trails and maintain motorized access to outdoor opportunities.
N148-18	As a matter of fact, many of these issues are so significant that we are concerned about the final version of the plan. We request a second draft of the EIS and another opportunity for public comment before the plan is finalized.	The Final EIS will be made available for a 30-day public review, but NPS will not respond to comments.
N154-1	However, I oppose the park's precedent-setting action found in preferred alternative (#5), which would allow recreational ORV use on trails in Wrangell-St. Elias National Park.	Based on public comment on the Draft EIS, the Final EIS analyzes a sixth alternative which combines elements of Alternatives 4 and 5 of the Draft alternative. It proposed to fix trails to a maintainable standard, but would not permit recreational ORV use on improved trails in the national park portions of Nabesna District.

Table 5-2. Comment Letter Index

Letter ID	First Name	Last Name	Organization Identified	Page Numbers ¹
N001	Sherry	Barnes	Northway Elder	Non-substantive
N002	Dan	Burfoot	NA	Non-substantive
N003	Jim and Shirley	Hannah	NA	5-34-5-35
N004	Jayne, Michael, Jacob, Crystal and Andrew	Heaton	American Tax Paying Citizen	5-35
N005	Polly E.	Hyslop	Northway Tribal Member	Non-substantive
N006	Carl D.	Mitchell	NA	5-35
N007	William	Paleck	NA	5-13, 5-15, 5-28, 5-36, 5-87
N008	Leo	Pitts	NA	5-36
N009	William	Pitts	NA	5-36
N010	Timothy	Shine	NA	5-19, 5-28, 5-29, 5-36
N011	Larry	Stienbarger	NA	Non-substantive
N012	William	Sutton	NA	Non-substantive
N013	Stanley Russel	Justice	NA	Non-substantive
N014	Don	Quarberg	NA	5-22
N015	Elanor	Dementi	Chair Ahnta Inc	5-10, 5-13, 5-35, 5-36, 5-37, 5-69, 5-74
N016	Rod	Arno	Executive Director Alaska Outdoor Council	5-22, 5-37, 5-57, 5-69, 5-75
N017	Cliff	Eames	Board of Directors, Alaska Quiet Rights Coalition	5-6, 5-18, 5-20, 5-22, 5-27, 5-28, 5-38, 5-55, 5-56, 5-57, 5-69, 5-75, 5-87
N018	Anthony	Marchini	NA	Non-substantive
N019	Paul	Barrett	NA	Non-substantive
N020	Greg	Boyd	LTC (Ret)	5-76
N021	Patrick	Brower	NA	Non-substantive
N022	Tina	Brown	NA	5-38, 5-58
N023	J.	Capozzelli	NA	5-87
N024	John	Chastan	NA	Non-substantive
N025	Kevin	Clement	NA	5-39, 5-58
N026	William	Delaney	NA	Non-substantive
N027	Jo	Dempsey	NA	Non-substantive
N028	Bob	Devore	President GLFWDA	Non-substantive
N029	Dick	Martin	NPS retired, Former Superintendent, WRST	5-58
N030	Donald	Horrell	NA	Non-substantive
N031	John	Eaton	NA	Non-substantive
N032	Nina	Faust	NA	5-39
N033	Nylenda	Heatherly	NA	5-23, 5-75, 5-76
N034	Paul	Hittie	NA	Non-substantive
N035	Douglas	Hope	NA	5-39, 5-76, 5-77
N036	Joyce	Horrell	NA	Non-substantive
N037	Tom R.	Huddleston	NA	Non-substantive

Table 5-2. Comment Letter Index

Letter ID	First Name	Last Name	Organization Identified	Page Numbers ¹
N038	Gary	Huntsinger	NA	Non-substantive
N039	Isaac	Ellis	NA	5-77
N040	James	Horrell	NA	Non-substantive
N041	Ch	Jarema	NA	Non-substantive
N042	Sue C.	Johnson	NA	Non-substantive
N043	Darren	Keil	NA	Non-substantive
N044	Bonnie	Kenyon	NA	5-39
N045	Jackie	Kimbrell	NA	Non-substantive
N046	Maureen	Knutsen	NA	Non-substantive
N047	Ray	Kreig	RA Kreig & Associates	5-40, 5-58
N048	Linda	Lohse	NA	5-14, 5-40
N049	James	Marchini	NA	Non-substantive
N050	Daryl	McAm	NA	Non-substantive
N051	Suzanne	McCarthy	NA	5-20, 5-56, 5-77
N052	CD	McCurry	NA	Non-substantive
N053	Lisa	Moorehead	Wilderness Birding Adventures	Non-substantive
N054	David	Neph	NA	Non-substantive
N055	Diane C.	Okonek	NA	Non-substantive
N056	Don	Pendergrast	Ph.D.	5-56
N057	Wanda and William	Perdue	NA	5-26
N058	Phillip	Heatherly	NA	5-40, 5-77
N059	David	Pisaneschi	NA	5-40, 5-58
N060	Don	Quarberg	NA	5-20, 5-29, 5-40
N061	Ryne	Radigan	NA	5-87, 5-88
N062	Gene A.	Reed	NA	5-40, 5-87
N063	Douglas	Saul	NA	Non-substantive
N064	25 signatures		NA	5-41, 5-56, 5-69
N065	Dr. David	Schneider	NA	Non-substantive
N066	Cynthia	Schraer	NA	5-7
N067	Richard	Wilson	NA	Non-substantive
N068	Larry	Sinyon	Cheesh'Na Tribal Council	5-6, 5-13, 5-14, 5-41, 5-88
N069	Rick	Smith	Chair, Coalition of NPS Retirees	5-7, 5-29, 5-41, 5-56, 5-77
N070	Sue	Entsminger	Eastern Interior Alaska Subsistence Regional Advisory Council	Non-substantive
N071	Christine	Reichgott	Manager, Environmental Review and Sediment Management Unit, USEPA	Non-substantive
N072	Jim	Stratton	Alaska Regional Director, National Parks Conservation Association and Wilderness Society	5-6, 5-7, 5-23, 5-26, 5-29, 5-41, 5-42, 5-43, 5-59, 5-60, 5-61, 5-70, 5-71, 5-72, 5-75, 5-77, 5-78, 5-79, 5-88

Table 5-2. Comment Letter Index

Letter ID	First Name	Last Name	Organization Identified	Page Numbers ¹
N073	Bert	Adams	Chairman, WRST Subsistence Resource Commission	5-10, 5-16, 5-18, 5-20, 5-29, 5-44, 5-45, 5-73, 5-75, 5-79
N074	Eddie	Grasser	Regional Representative, Alaska & Hawaii, Safari Club International	5-78
N075	William (Pete)	Baldwin	Signatures representing Slana, Tok, Mentasta, and Chistochina	5-10, 5-14, 5-15, 5-17, 5-18, 5-20, 5-21, 5-24, 5-45, 5-46, 5-73, 5-78, 5-79, 5-80
N076	William	Horn	Specialty Vehicle Institute of America	5-13, 5-28, 5-30, 5-31, 5-46, 5-56, 5-73
N077	Jack	Hession	Sierra Club Alaska Chapter	5-47, 5-62, 5-63
N078	Susan E.	Magee	State of Alaska, ANILCA Implementation Program	5-11, 5-14, 5-15, 5-17, 5-18, 5-21, 5-24, 5-25, 5-31, 5-48, 5-57, 5-63, 5-64, 5-74, 5-80, 5-81, 5-82, 5-88
N079	Ole	Bates	Slana Alaskans Unite	5-25, 5-31, 5-48, 5-64, 5-74, 5-82, 5-88
N080	Stan	Leaphart	State of Alaska, Citizens' Advisory Commission on Federal Areas	5-48, 5-49, 5-65, 5-81, 5-83
N081	Ruth	McHenry	Copper Country Alliance	5-10, 5-11, 5-12, 5-13, 5-21, 5-28, 5-49, 5-65, 5-83
N082	George & Frances	Alderson	NA	5-50-5-65
N083	Derrick G.	Bell	NA	Non-substantive
N084	Bruce	Connery	NA	5-32
N085	Steve	Carwile	NA	5-7, 5-8, 5-9, 5-17, 5-19, 5-25, 5-32, 5-33, 5-54, 5-55, 5-74, 5-88
N086	Dave	Syren	NA	Non-substantive
N087	Daniel M.	Feltz	Alaska ATV Club/Anchorage Snowmobile Club/Curry Ridge Riders Club	Non-substantive
N088	NA	Frost	NA	Non-substantive
N089	Brian R.	Hemingway	NA	Non-substantive
N090	Jeff J.	Bertrand	NA	5-50
N091	Irene	Loper	NA	Non-substantive
N092	Lauree	Lucey	NA	5-50, 5-83
N093	Anonymous 1		NA	5-66
N094	Mark	Pearson	NA	5-51
N095	Liz	Robinson	NA	5-51
N096	Anonymous 2		NA	5-51, 5-66
N097	Brad	Henspeter	NA	5-12, 5-50, 5-51, 5-74, 5-83, 5-84, 5-88

Table 5-2. Comment Letter Index

Letter ID	First Name	Last Name	Organization Identified	Page Numbers ¹
N098	Sean J.	McGuinness	NA	5-52, 5-66, 5-84
N099	Allen E.	Smith	NA	5-33, 5-66, 5-67, 5-84
N100	Peter	Mjos	NA	Non-substantive
N101	Darlene	Odgaard	NA	Non-substantive
N102	Jeff	Wolfe	NA	Non-substantive
N103	R	Benson	NA	5-84
N104	George A.	Brown	NA	5-89
N105	Allan C.	Bryan	NA	Non-substantive
N106	Robert W.	Bundtzen	NA	Non-substantive
N107	Barbara J.	Challoner	NA	Non-substantive
N108	Chancy	Croft	NA	Non-substantive
N109	Michele S.	Cornelius	NA	Non-substantive
N110	Ralph D.	Deckard	NA	Non-substantive
N111	Billy	Donley	NA	Non-substantive
N112	Rick C.	Ellis	Alaska Frontier Trappers Association	Non-substantive
N113	Kim F.	Floyd	NA	5-84
N114	Arthur E.	Greenwalt	NA	Non-substantive
N115	Melvin B.	Grove	NA	Non-substantive
N116	Anonymous 3		NA	5-8
N117	David	Hewko	NA	Non-substantive
N118	Dick	Hingson	Sierra Club's National Park and Monuments Committee	Non-substantive
N119	Frank E.	Hollis	NA	5-89
N120	James C.	Croft	NA	Non-substantive
N121	Jeremy	E	NA	Non-substantive
N122	Jeff E.	Jesson	NA	Non-substantive
N123	Orville W.	Johnson	NA	Non-substantive
N124	Robert	Jordan	Sierra Club	5-53
N125	Kenneth W.	Barber	Alaska Outdoor Access Alliance	5-21, 5-55, 5-87
N126	Carl A.	Kinney	NA	Non-substantive
N127	Gregory	Lebo	NA	5-88
N128	Christopher	Lish	NA	Non-substantive
N129	Kathryn E.	Longlet	NA	Non-substantive
N130	Chris J.	Manion	NA	Non-substantive
N131	Eric M.	McGhee	NA	5-21, 5-53
N132	Mark W.	Miller	NA	Non-substantive
N133	Christine M.	Mitchell	NA	Non-substantive
N134	Anonymous 4		NA	Non-substantive
N135	Paul A.	Newman	NA	Non-substantive
N136	David G.	Gish	NA	Non-substantive
N137	Patti L.	Barber	Alaska Outdoor Access Alliance	Non-substantive
N138	Richard J.	Person	NA	Non-substantive
N139	Mary E.	Pieper	NA	Non-substantive
N140	Nick	Pilch	Sierra Club	Non-substantive
N141	David	Porter	NA	Non-substantive

Table 5-2. Comment Letter Index

Letter ID	First Name	Last Name	Organization Identified	Page Numbers ¹
N142	Victoria	Rego	NA	5-26, 5-85
N143	Sara	Lucey	NA	5-53
N144	Craig L.	Saunders	Alaska Outdoor Access Alliance	5-53
N145	Kurt R.	Schwarz	Maryland Ornithological Society	5-12, 5-53, 5-67, 5-85
N146	Karl	Severance	NA	5-66, 5-85
N147	Anonymous 5		NA	Non-substantive
N148	Susan	Smith	Residents of Wrangells	5-16, 5-21, 5-28, 5-34, 5-51, 5-54, 5-67, 5-68, 5-69, 5-86, 5-87
N149	Gregory R.	Svendsen	NA	Non-substantive
N150	Toni	Croft	NA	5-54
N151	Andrew R.	Zajac	NA	5-69
N152	Daniel	Nelson	NA	Non-substantive
N153	Dave	Sarafin	NA	5-9, 5-12, 5-17, 5-54
N154	Multiple	Multiple	NPCA Members, 12,587 emails submitted	5-89

NA = not applicable or not available

¹ This column lists the page numbers where individual substantive comments and NPS responses can be found in Table 5-1. Page numbers are not listed for non-substantive comments.

5.4 Recipients of the Final Environmental Impact Statement

This list includes all agencies, organizations, and people that received copies of this ORV Management Plan/EIS or a letter notifying them the EIS was available.

U.S. Congressional and Alaska State Legislature Delegations

U.S. Senator Lisa Murkowski

U.S. Senator Mark Begich

U.S. Congressman Don Young

Federal Agencies

Environmental Protection Agency, Region 10

U.S. Army Corps of Engineers, Regulatory Branch, South Section

U.S. Department of the Interior, Office of Environmental Policy and Compliance, Alaska

Bureau of Indian Affairs

BLM, Glennallen Field Office

Fish and Wildlife Service, Alaska Region

Southcentral Alaska Subsistence Resource Advisory Council

Tetlin National Wildlife Refuge

State and Local Agencies

Alaska Department of Fish and Game

Game Management Unit 12 Biologist

Game Management Unit 13 Biologist

Alaska Department of Natural Resources, ANILCA Implementation Program

State Historic Preservation Officer

Indian Tribes and other Alaska Native Organizations

Cheesh-na Tribal Council
Dot Lake Village Council
Mentasta Traditional Council
Mt. Sanford Tribal Consortium
Tanana Chiefs Conference
Tetlin IRA Council
Tok Native Association

Organizations

Alaska Center for the Environment
Alaska Outdoor Council, Executive Director
Alaska Quiet Rights Coalition
Ahtna, Inc.

Anchorage Audobon Society
Blue Ribbon Coalition
Bluewater Network
Citizens Advisory Commission on Federal Areas
Coalition of National Park Service Retirees
Copper Country Alliance
National Parks Conservation Association, Alaska Regional Office
Residents of Wrangells
Sierra Club Alaska
The Wilderness Society
Trustees for Alaska
Wrangell Mountain Center

Individuals

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Allen E. Smith	Charles Christy
Arthur Greenwalt	Christina Grangaard
Bill Sherwonit	Cole Ellis
Billy Givens	Dale Lackner
Bob Rutherford & Teri Grannan	Darren Keil
Bonnie Kenyon	Dave Syren
Brad Gavitt	David & Leann Young
Brad Henspeter	David Graves
Brenda Herington	David Neph
Brian Anderson	David Pisaneschi
Brian Okonek	David, Dennis, & Lauree Lucey
Brittany Bell	Debbie Capps
Bruce McKeeman	Dick Hingson
C.D. McCurry	Dick Martin
Calvin Justin	Don Horrell
Carl Christensen	Don Pendergrast
Carl Mitchell	Doris Charles
Carol Zaller	Doug Frederick
Cecil Sanford	Douglas Saul

Dr. David Schneider	Jim Hersberger
Ed Daniel	Jim Morris
Eric Hannan	Jo Dempsey
Ernest Cuzzocreo	Joe Riley
Ernie Charlie	Joel Schwartz
Ethal Brooks	John & Jill Rusyniak
Floyd Poage Jr.	John Behrands
Fran Mauer	John Eaton
Francisco Domokos	John Gardner
Frank Woods	John Harvey
Gale Westesdoll	John Ward
Gary Britter	Joy Hobbs
Gene Reed	Judy Caminer
Geoffrey Orth	Katie John
George Alderson	Keith Hoofnagle
George Brown	Keith Wehste
Gina Potts	Kenny Barber
Gloria Stickwan	Kevin Clement
Greg Boyd	Kim Floyd
Harry & Donna Buchea	Kirk Ellis
Isaac Ellis	Kristan Crozier
Jack Hession	Kyle Bien
Jackie Kimbrell	Larry Steiberg
James Abraham	Laura Hancock
James Pence	Lauree Lucey
Jarrett Humphreys	Leah DeWitt
Jason Outhier	Lee Tolliver Jr.
Jason Shumway	Lena Charley
Jason Wenger	Leonard Sanford
Jasper Dillbeck	Linda Lohse
Jean & Mae Frost	Lisa Eckert
Jeff Bertrand	Lisa Moorhead
Jeff Gries	Liz Robinson
Jeff Herbert	Lonnie Boutt
Jeff Hermanns	Lorene Ellis
Jeffrey Bertrand	Lynn Grams
Jeffrey Cox	Marjorie West
Jeremy James	Mark Pearson
Jeremy Waltz	Maureen Knutson
Jesse Paul	Maurice Shulte
Jim & Cathy Knighten	Melissa Blair
Jim Ainsworth	Michael Williams
Jim Beeter	Michele Arley
Jim Hannah	Michele Cornelius

Michelle James	Sherry Barnes
Mike Breen	Shirleen Beach
Mike Stonge	Stan Justice
Nancy Dooley	Stephen Wahl
Nina Faust	Steven John
Norman Sutter	Sue Cuzzocreo
Ole Bates	Sue Entsminger
Oliver Moore, Jr.	Susan Johnson
Pamela Johnson	Susan Smith
Paris Woodhams	Suzanne McCarthy
Patrick Brown	Ted & Maude Ann Foster
Penny Pfeffer	Teresa Sager Albaugh
Pete Baldwin	Terry Brigner
Philip Lucas	Terry Garber
Polly Hyslop	Thomas Scott
Ray Kreig	Tim Shine
Rob Treat	Todd Torkelson
Robert Bundtzen	Tom Bertrand
Roberta Bertrand	Tom Buttenob
Rosene Bongiovanni	Tom Walyer
Rosie White	Tony Booth
Ryne Radigan	Vicki Penwell
Sam D. Hunt	Wayne Schafer
Sam Hunt	William Morris
Sara Taylor	William P. Horn
Scot McElveen	William Palleck
Scott Hala	William Pitts
Sean McGuiness	Willy James
Sharon Smith	Wilson Justin
Sheri Hannah-Ruh	

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Brita Woeck, Biologist,
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Weber Greiger, Archaeologist,
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Stephanie Myers, Public Involvement Specialist
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Deborah Wilson, Technical Editor,
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National Park Service, Alaska Regional Office

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Chapter 6: References

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6.0 CHAPTER 6: REFERENCES

6.1 Bibliography

ADF&G (Alaska Department of Fish and Game). 1996. Off road vehicle and snowmachine use in Alaska: a report to the Alaska Board of Game. Alaska Department of Fish and Game, Division of Wildlife Conservation. Update to 1990 report.

ADF&G. 2008a. Moose Management Report of Survey Inventory Activities, 2004 to 2007. Available online at: http://www.wildlife.alaska.gov/pubs/techpubs/mgt_rpts/08_moose.pdf.

ADF&G. 2008b. Dall Sheep Management Report of Survey Inventory Activities, 2004 to 2007. Available online at: http://www.wildlife.alaska.gov/pubs/techpubs/mgt_rpts/08_sheep.pdf. ADF&G. 2008c. Bison Management Report of Survey-Inventory Activities 1 July 2005–30 June 2007. P. Harper, ed. Juneau, Alaska.

ADF&G. 2008d. Mountain Goat Management Report of Survey-Inventory Activities 1 July 2005–30 June 2007. P. Harper, ed. Juneau, Alaska.

ADF&G. 2008e. Subsistence management regulations for the harvest of wildlife on federal public lands in Alaska. Anchorage, Alaska. <http://alaska.fws.gov/asm/law.cfm?law=2&wildyr=2008>.

ADF&G. 2009a. General Harvest Reports. Available online at: <http://www.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>.

ADF&G. 2009b. 2009-2010 Alaska hunting regulations. No. 50. <http://www.wildlife.alaska.gov/index.cfm?adfg=regulations.hunting>.

ADF&G. 2009c. 2009-2010 Alaska trapping regulations. No. 50. <http://www.wildlife.alaska.gov/regulations/pdfs/trapping.pdf>.

ADOT&PF (Alaska Department of Transportation and Public Facilities). 2007. Northern Region: Annual Traffic Volume Report, 2005 - 2006 - 2007. Available at: http://dot.alaska.gov/stwdplng/mapping/trafficmaps/trafficdata_reports_nor/complete2007VolumeReport.pdf.

ADOT&PF. 2008. Annual Traffic Volume Report, 2006 - 2007 - 2008. Available at: http://dot.alaska.gov/stwdplng/mapping/trafficmaps/trafficdata_reports_nor/complete2008volumereport.pdf.

Ahlstrand, G.M. and C.H. Racine. 1990. Response of an Alaskan Shrub-Tussock Community to Selected All-Terrain Vehicle Use. National Park Service, Southeast Region. Research/Resources Management Report AR-19. December. 114 pp.

Alaska DCRA (Alaska Department of Community and Regional Affairs). 2009. Community Database Online. Community profiles for Chistochina, Mentasta Lake, and Slana. Available online at: http://www.commerce.state.ak.us/dca/commdb/CF_COMDB.htm.

Alaska Department of Labor. 2009a. Population Estimates. Table 4.3 Alaska Places 2000–2008. March 16. Available online at: <http://laborstats.alaska.gov>.

Alaska Department of Labor. 2009b. Preliminary Annual Employment and Earnings – 2008. July 13. Available online at: <http://laborstats.alaska.gov>.

Alaska Department of Labor. 2009c. Inflation Calculator for Anchorage and the U.S. Updated January 22. Available online at: <http://laborstats.alaska.gov>.

AMBCC (Alaska Migratory Bird Co-management Council). 2009. 2009 Alaska subsistence spring/summer migratory bird harvest regulations. Office of the Alaska Migratory Bird Co-management Council, Anchorage, Alaska.

Allen, J.L., K.E. Shea, W.M. Loya, and P.J. Happe. 2000. All-terrain Vehicle (ATV) Trail Mitigation Study: Comparison of Natural and Geosynthetic Materials for Surface Hardening within Wrangell-St. Elias National Park and Preserve. 2000 Wrangell-St. Elias National Park and Preserve Research and Resource Monitoring Report. 80 pp.

Armstrong, R.H. 2000. Guide to the Birds of Alaska. Fourth edition. Alaska Northwest Books, Anchorage, Alaska.

Auerbach, N.A., M.D. Walker, and D.A. Walker. 1997. Effects of Roadside Disturbance on Substrate and Vegetation Properties in Arctic Tundra. *Ecological Application* 7(1):218-235.

Barbour, M.T., J. Gerritsen, B.D. Snyder, and J.B. Stribling. 1999. Rapid Bioassessment Protocols for Use in Streams and Wadeable Rivers: Periphyton, Benthic Macroinvertebrates, and Fish, Second Edition. EPA 841-B-99-002, U.S. Environmental Protection Agency; Office of Water; Washington, D.C.

Barten, N.L. 1998. Habitat Use by Parturient and Nonparturient Caribou of the Mentasta Caribou Herd. Thesis, University of Alaska Fairbanks, Fairbanks, Alaska.

Bauder, P. and J. Heys. 2004. Exotic Plant Management at Wrangell-St. Elias National Park and Preserve; Summer 2004 Field Season Report. National Park Service. Wrangell-St. Elias National Park and Preserve.

Bentzen, T.W. 2008a. Unit 12 Dall's sheep. Pages 60–76 in P. Harper, ed. Dall's Sheep Management Report of Survey and Inventory Activities 1 July 2004–30 June 2007. Project 6.0. Alaska Department of Fish and Game, Juneau, Alaska

Bentzen, T.W. 2008b. Unit 12 Black Bear. Pages 155–166 in P. Harper, ed. Black Bear Management Report of Survey and Inventory Activities 1 July 2004 through 30 June 2007. Project 17.0. Alaska Department of Fish and Game, Juneau, Alaska.

Bisson, P.A. and R.E. Bilby. 1982. Avoidance of Suspended Sediment by Juvenile Coho Salmon. *N. Amer. J. Fish. Man.* 4: 371-374.

Boreal Partners in Flight Working Group. 1999. Landbird Conservation Plan for Alaska Biogeographic Regions. Version 1.0. Unpublished report. U.S. Fish and Wildlife Service, Anchorage, Alaska. Available at: http://www.partnersinflight.org/bcps/plan/pl_ak_10.pdf.

Bowyer, R.T., V. Van Ballenberghe, and J.G. Kie. 2003. Moose *Alces alces*. Pages 931–964 in G. A. Feldhamer, B. C. Thompson, and J. A. Chapman, eds. *Wild Mammals of North America: Biology, Management, and Conservation*. Johns Hopkins University Press, Baltimore, Maryland.

Buncic, C.M., R. McLean, and T. Nichols. 2009. A Survey of Recreational Off-Road Vehicle (ORV) Stream crossings Along Trails Originating From the Nabesna Road in Wrangell-St. Elias National Park and Preserve. Alaska Department of Fish and Game, Division of Habitat. February 2009.

Cellarius, B. 2009. Personal Communication. Cultural Anthropologist/Subsistence Specialist, Wrangell-St. Elias National Park and Preserve, Copper Center, AK. January 15.

Chapman, D.W. 1988. Critical Review of Variables used to Define Effects of Fines in Redds of Large Salmonids. Trans. Amer. Fish. Soc. 117: 1-21.

Clark, D.W. 1981. Prehistory of the Western Subarctic. In *Subarctic*, edited by June Helm, pp. 107-129. Handbook of North American Indians, Vol. 6, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Cole, D.N. 2004. Wilderness Experiences: What Should We Be Managing For? *International Journal of Wilderness* 10(3):25-27.

Connery, B. 1987. Mechanized Vehicle Trail Survey. Unpublished Report. Wrangell St. Elias National Park and Preserve, Copper Center, Alaska.

Cook, J.G., B.K. Johnson, R.C. Cook, R.A. Riggs, T. Delcurto, L.D. Bryant, and L.L. Irwin. 2004. Effects of summer-autumn nutrition and parturition date on reproduction and survival of elk. *Wildlife Monographs* 155. 61 pp.

Cook, M.B. 1990. Monitoring report for access to mine claims in the Gold Hill area in Wrangell-St. Elias National Park and Preserve, Alaska. January. 131 pp.

Cook, M.B., C.A. Roland, and P.A. Loomis. 2007. An Inventory of the Vascular Flora Wrangell St. Elias National Park and Preserve, Alaska. National Resource Technical Report.

Copper Valley Economic Development Council. 2003. Copper Valley Regional Plan Comprehensive Economic Development Strategy 2003. Available online at: <http://www.coppervalley.org/community.html>.

Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Services. Washington D.C.

Dawson, C. 2004. Monitoring Outstanding Opportunities for Solitude. *International Journal of Wilderness* 10(3):12-14, 20.

De Laguna, F. and C. McClellan. 1981. Ahtna. In *Subarctic*, edited by June Helm, pp. 641-663. Handbook of North American Indians, Vol. 6, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Dixon, E.J. 1985. Cultural Chronology of Central Interior Alaska. *Arctic Anthropology* 22(1):47-66.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, U.S. Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.

ESA Adolfson. 2006. State of Washington Off Road Vehicle Noise Study and Recommendations. Prepared for the Washington Interagency Committee for Outdoor Recreation by ESA Adolfson, in association with Geomatrix Consultants, Inc. Seattle, Washington.

Farnell, R. and C.L. Gardner. 2002. Status of the Chisana caribou herd - 2002. Yukon Department of the Environment, Whitehorse, Yukon, Canada and Alaska Department of Fish and Game, Tok, Alaska, USA. 26 pp.

Federal Highway Administration. 1988. Visual Impact Assessment for Highway Projects. (FHWAHI-88-054.) U.S. Department of Transportation.

Federal Subsistence Management Program. 2008. Available online at:
<http://alaska.fws.gov/asm/about.cfml>.

Foy, C.D., Chaney, R.L., and M.C. White. 1978. The physiology of Metal Toxicity in Plants. Annual Review of Plant Physiology 29:511-566.

Geographic Resources Solutions. 2008. Soil Landscape Mapping.

Gilmore, L and T. Harper. 2008. Invasive Plant Management Program Wrangell-St. Elias National Park and Preserve 2008 Seasonal Report. Wrangell-St. Elias National Park and Preserve

Glaspell, B. and A. Watson. 2003. 2002 Wrangell-St. Elias Fall Visitor Study, Draft Project Report. Aldo Leopold Wilderness Research Institute, Missoula, Montana. March.

Government Accounting Office (GAO). 2007. Climate change - Agencies should develop guidance for addressing the effects on federal land and water resources. GAO-07-863. Washington, DC.

Gross, J.A. 2007a. Unit 12 brown bear. Pages 132–142 in P. Harper, ed. Brown bear management report of survey and inventory activities 1 July 2004–30 June 2006. Project 4.0. Alaska Department of Fish and Game, Juneau, Alaska.

Gross, J.A. 2007b. Unit 12 caribou. Pages 56-64 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2004-30 June 2006. Alaska Department of Fish and Game. Project 3.0. Juneau, Alaska, USA.

Gross, J.A. 2008. Unit 12 moose. Pages 134–150 in P. Harper, editor. Moose management report of survey and inventory activities 1 July 2005–30 June 2007. Project 1.0. Alaska Department of Fish and Game, Juneau, Alaska.

Happe, P.J., K.E. Shea, and W.M. Loya. 1998. Assessment of All-terrain Vehicle (ATV) Impacts: within Wrangell-St. Elias National Park and Preserve, Alaska. 1998 Wrangell-St. Elias National Park and Preserve Research and Resource Monitoring Report No. 98-1. 130 pp.

Harrison, R.T., W.J. Makel, and L.B. Besse. 1993. Sound Levels of Five Motorcycles Travelling Over Forest Trails, Rock Creek ORV Area. U.S. Department of Agriculture, Forest Service, San Dimas Technology & Development Center. San Dimas, California.

Haynes, T.L. and S. Walker. 1995. Pilot Project: Documenting Traditional and Subsistence Access in Wrangell-St. Elias National Park and Preserve. Alaska Department of Fish and Game, Juneau, Alaska.

Haynes, T.L. and W.E. Simeone. 2007. Upper Tanana Ethnographic Overview and Assessment, Wrangell St. Elias National Park and Preserve. *Technical Paper No. 325*, Alaska Department of Fish and Game, Division of Subsistence, Juneau, Alaska.

Heimer, W.E. 1994. Dall sheep. Wildlife Notebook Series. Alaska Department of Fish and Game. <http://www.adfg.state.ak.us/pubs/notebook/notehome.php>.

Hollis, A.L. 2007. Units 12 and 20E furbearer. Pages 140–154 in P. Harper, ed. Furbearer management report of survey and inventory activities 1 July 2003–30 June 2006. Project 7.0. Alaska Department of Fish and Game, Juneau, Alaska.

Hollis, A.L. 2006. Unit 12 wolf management report. Pages 76-89 in P. Harper, editor. Wolf management report of survey and inventory activities 1 July 2002-30 June 2005. Alaska Department of Fish and Game. Project 14.0. Juneau, Alaska, USA.

Jenkins, K.J. 1995. Population dynamics of the Mentasta caribou herd, Wrangell-St. Elias National Park and Preserve: progress report and preliminary assessment. WRST Research and Resource Management Report No. 95-1. Glennallen, Alaska.

Jones, G.R., J. Jones, B.A. Gray, B. Parker, J.C. Coe, J.B. Burnham, and N.M. Geitner. 1975. A method for the quantification of aesthetic values for environmental decision making. *Nuclear Technology* 25(4): 682–713.

Justin, W. 2007. Transcribed notes from NPS interview with Wilson Justin, local Ahtna resident well-versed on local trails. Nov 1, 2007.

Kari, J., compiler and editor. 1997. Upper Tanana Place Names Lists and Maps. Final report for "Upper Tanana Place Names in the vicinity of Wrangell-St. Elias National Park." Sponsored by Wrangell-St. Elias National Park, Cooperative Agreement: CA 9700-5-9023 with the Alaska Native Language Center, University of Alaska, Fairbanks, Alaska.

Kari, J., editor. 1983. Ahtna Place Names Lists. Compiled by James Kari and Mildred Buck. Sponsored by the Alaska Humanities Forum. A joint publication of the Copper River Native Association and Alaska Native Language Center, University of Alaska, Fairbanks, Alaska.

Kari, J., transcriber and editor. 1986. *Tatl'ahwt'aenn Nenn': The Headwaters People's Country, Narratives of the Upper Ahtna Athabaskans*. Alaska Native Language Center, University of Alaska, Fairbanks, Alaska.

Karl, T., J. Melillo, and T. Peterson. 2009. *Global Climate Change Impacts in the United States*. Cambridge University Press

Kelleyhouse, R.A. 2006. Unit 11 wolf management report. Pages 69–75 in P. Harper, ed. Wolf management report of survey and inventory activities 1 July 2002–30 June 2005. Project 14.0. Alaska Department of Fish and Game, Juneau, Alaska.

Kozie, K. 1996. Bald Eagle Productivity for Wrangell-St. Elias National Park and Preserve 1993-1996. Wrangell-St. Elias National Park and Preserve, Copper Center, Alaska.

Krausman, P.R. and R.T. Bowyer. 2003. Mountain sheep. Pages 1095–1115 in G. A. Feldhamer, B. C. Thompson, and J. A. Chapman (editors). *Wild mammals of North America*. Johns Hopkins University Press, Baltimore, Maryland.

Landres, P., C. Barns, J.G. Dennis, T. Devine, P. Geissler, C.S. McCasland, L. Merigiano, J. Seastrand, and R. Swain. 2008. *Keeping It Wild: An Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System*. Gen. Tech. Rep. RMRS-GTR-212, Fort Collins, Colorado: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 77 p.

League for the Hard of Hearing. 2003. Noise Facts. Available online at: <http://www.lhh.org/noise/facts/environment.html>.

ListServe 15.5 Safety Archives. 2000. Noise Levels, dated November 3, 2000. Available online at: <http://list.uvm.edu/cgi-bin/wa?A2=safety;IMIEdg;20001103095316-0500a>.

Littlejohn, M. 1996. Visitor Study Summer 1995, Wrangell-St. Elias National Park and Preserve. Visitor Services Project, Report 77. February 1996.

Lloyd, D.S. 1985. Turbidity in freshwater habitats of Alaska – A review of published and unpublished literature relative to the use of turbidity as a water quality standard. Report No. 85-1. ADFG, Division of Habitat, Juneau, AK.

Logsdon, C.L., W.C. Thomas, J. Kruse, M.E. Thomas, and S. Helgath. Not Dated. Copper River-Wrangells. Socioeconomic Overview. The Institute of Social and Economic Research and The Agricultural Experiment Station University of Alaska for the Forest Service.

Loomis, P. and R. Liebermann. 2006. Biological impacts of off-road vehicles in Alaska: a literature review. Denali National Park and Preserve, Denali Park, Alaska. May 10. 24 pp.

Markis, J., E. Veach, M. McCormick, and R. Hander. 2004. Freshwater Fish Inventory of Denali National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve, Central Alaska Inventory and Monitoring Network. Wrangell St. Elias National Park and Preserve, Copper Center, Alaska.

McKee, C. 2006a. Exotic Plants in Alaska's Parks. National Forest Service / University of Alaska. Available at: www.uaf.edu/snras/afes/pubs.

McKenna, R.A. 1981. Tanana. In *Subarctic*, edited by June Helm, pp. 562-576. Handbook of North American Indians, Vol. 6, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

McMahan, J.D. 1994. Cultural Resources Reconnaissance of Nabesna Road: Slana to Mile 42 (Project 64493). Office of History and Archaeology Report Number 41. Report prepared for Alaska Department of Transportation and Public Facilities, by Office of History and Archaeology, Anchorage.

Meixell, B.W. 2007. Aerial waterfowl surveys Wrangell-St. Elias National Park and Preserve, Alaska May–June 2007. Alaska Bird Observatory, Fairbanks, Alaska.

Meyer and Anderson. 2007. Trail Condition Map from 2004-2006. GIS Data.

Meyer, K.G. 2002. Managing degraded off-highway vehicle trails in wet, unstable, and sensitive environments. 0223-2821-MTDC. U.S. Department of Agriculture, Forest Service, Technology and Development Program. <http://www.fhwa.dot.gov/environment/fspubs/02232821/index.htm>.

Meyer, L., C. Murdoch, and C. Soiseth. 2007. ORV Generated Turbidity at Stream Crossings in the Dry Bay Preserve. Resources Management Division, Glacier Bay National Park and Preserve, Gustavus, Alaska.

Michael Minor & Associates, Inc. 2008. Fish Creek Off-Highway Vehicle Park Noise Study. Prepared for the City and Borough of Juneau, Land and Resource Division. Portland, Oregon.

Mitchell, C.D. 2000. Summary of wolf work in Wrangell-St. Elias NP/P. Unpublished memo, Wrangell-St. Elias National Park and Preserve.

National Off-Highway Vehicle Conservation Council. 2009. State OHV Regulations. <http://www.nohvcc.org/IMAGES/ohvregs.htm>.

NPS (National Park Service). 1986. General Management Plan, Land Protection Plan, Wilderness Suitability Review. Wrangell-St. Elias National Park and Preserve, Alaska. 239 pp.

NPS. 1988. Draft Environmental Impact Statement for the Wilderness Recommendation. Wrangell-St. Elias National Park and Preserve, Alaska. 122 pp. March.

NPS. 1993. Guiding Principles of Sustainable Design. Denver Service center, Denver Colorado.

NPS. 1995. Mentasta caribou herd cooperative management plan. Wrangell-St. Elias National Park and Preserve, Glennallen, Alaska.

NPS. 1996. A strategic plan for managing invasive nonnative plants on National Park System Lands. U.S. Department of Interior.

NPS. 1998. Archaeological Resources in Wrangell-St. Elias National Park and Preserve, Alaska: An Overview and Assessment. Resources Report NPS/ARRCR/CRR-98/32. U.S. Department of the Interior, National Park Service, Alaska Region, Alaska Support Office, Cultural Resources Team, Anchorage.

NPS. 2001. Director's Order No. 12. Conservation Planning, Environmental Impact Analysis, and Decision-Making and Handbook. Approved 1/8/01.

NPS. 2006a. National Park Service Management Policies 2006. August 31, 2006.

NPS. 2006b. Weather. Wrangell-St. Elias National Park and Preserve. Last Updated November 9. Available: <http://www.nps.gov/wrst/planyourvisit/weather.htm>.

NPS. 2006c. Permafrost and Forests. Wrangell-St. Elias National Park and Preserve. Last Updated November 8. Available: <http://www.nps.gov/wrst/naturescience/permafrost.htm>.

NPS. 2007a. Cantwell Subsistence Off-Road Vehicle Management Environmental Assessment. Denali National Park and Preserve. May 2007.

- NPS. 2007b. Established and Maintainable Access to Inholdings Programmatic Environmental Assessment. Wrangell-St. Elias National Park and Preserve. November 2007.
- NPS. 2008a. ORV Planning Newsletter. Spring 2008, Volume 1, Issue 1. U.S. Department of the Interior, National Park Service, Wrangell-St. Elias National Park and Preserve. Copper Center, Alaska.
- NPS. 2008b. Summary of 2008 Rail Counter Data. Unpublished Spreadsheet. Updated September.
- NPS. 2008c. Wrangell-St. Elias National Park and Preserve Landcover Mapping Project. National Resource Technical Report NPS/WRST/NRTR-2008/095.
- NPS. 2008d. Scoping Report Nabesna ORV Trail Environmental Impact Statement. U.S. Department of the Interior, National Park Service, Wrangell-St. Elias National Park and Preserve. Copper Center, Alaska. 18 pages. July.
- NPS. 2009a. Home page for Wrangell-St. Elias National Park and Preserve, Alaska. Available online at: <http://www.nps.gov/wrst/>.
- NPS. 2009b. Nabesna Road Guide. Wrangell-St. Elias National Park & Preserve. Available online at: <http://www.nps.gov/wrst/index.htm>.
- NPS. 2009c. Nabesna Road ORV Trails. Available at:
<http://www.nps.gov/wrst/planyourvisit/upload/Nabesna%20OHV%20Guide%206-19-09.pdf>.
- NPS. 2009d. Federal Subsistence Permits in Wrangell-St. Elias NPP, 2003–08. March 4. Unpublished data.
- NPS. 2009e. Bird Checklist, Wrangell-St. Elias. Available online at:
<http://www.nps.gov/wrst/naturescience/upload/WRST%20Bird%20Checklist.pdf>.
- NPS. 2009f. Fact Sheet, Wrangell-St. Elias National Park and Preserve, Alaska. Available online at: <http://www.nps.gov/wrst/planyourvisit/upload/WRST%20FACT%20SHEET%202009-2.pdf>.
- NPS. 2009g. Public Use Cabins. Available online at:
<http://www.nps.gov/wrst/planyourvisit/upload/Backcountry%20CABINS%20book%20Updated%2012-3.pdf>.
- NPS. 2009h. Nabesna ORV EIS Wilderness Information. Unpublished paper. Provided September 9, 2009. Wrangell-St. Elias National Park and Preserve, Copper Center, Alaska.
- NPS. 2009i. Attended Sound Logging Sessions, Caribou Creek Trail, Tanada Lake Trail, Copper Lake Trailhead, and Dead Dog Hill. Unpublished database.
- NPS. 2009j. Detailed prescriptions and cost estimates for Alternatives 3, 4, and 5. Unpublished maps, spreadsheets, and summary documents.
- NPS. 2009k. Nabesna ORV EIS trails/alternatives summary table. Unpublished document.
- NPS. 2009l. Spreadsheet of Chisana Caribou Herd Population Data 1982-2009. Unpublished document.

- Newcombe, C.P. and D.D. MacDonald. 1991. Effects of suspended sediments on aquatic ecosystems. *N. Amer. J. Fish. Man.* 11: 72-82.
- Newcombe, C.P. and J.O.T. Jensen. 1996. Channel suspended sediment and fisheries: A synthesis for quantitative assessment of risk and impact. *N. Amer. J. Fish. Man.* 16: 693-727.
- NOAA Fisheries—National Marine Fisheries Service (NMFS). 2004. Sediment removal from freshwater salmonid habitat: Guidelines to NOAA Fisheries staff for the evaluation of sediment removal actions from California streams. NOAA Fisheries – Southwest Region. April 2004. <http://swr.nmfs.noaa.gov/hcd/policies/April19-2004.pdf>.
- Paquet, P.C., and L.N. Carbyn. 2003. Gray wolf. Pages 482–510 in G. A. Feldhamer, B. C. Thompson, and J. A. Chapman (editors). *Wild mammals of North America*. Johns Hopkins University Press, Baltimore, Maryland.
- Pratt, K.L. 1997. Report of Investigations for Sasluuggu' (Old Suslota) BLM-AA-10714K and BesCe'e (New Suslota) BLM-AA-10714L, Bureau of Indian Affairs, ANCSA Office, Anchorage, AK.
- Proue, M., B. Neely, and H. Hardy. 2009. 2008 Addendum to Cultural Resource Survey of ORV Trails, Wrangell-St. Elias National Park and Preserve, Alaska. Report prepared by Northern Land Use Research, Inc., Fairbanks. Report prepared for Wrangell-St. Elias National Park and Preserve, Copper Center, Alaska.
- Proue, M., J. Hays, B. Neely, and J. D. Reuther. 2008. Cultural Resource Survey of ORV Trails, Wrangell-St. Elias National Park, Alaska. Report prepared by Northern Land Use Research, Inc., Fairbanks. Report prepared for Wrangell-St. Elias National Park and Preserve, Copper Center, Alaska.
- Putera, J. 2009. Annual Report on Vital Signs Monitoring of Distribution and Abundance of Bald Eagles in Wrangell-St. Elias National Park & Preserve. Wrangell-St. Elias National Park and Preserve, Copper Center, Alaska.
- Rausch, R.A. and B. Gasaway. 1994. Moose. Wildlife Notebook Series. Alaska Department of Fish and Game. <http://www.adfg.state.ak.us/pubs/notebook/notehome.php>.
- Real, C. 2009. Sound Off, Science of Noise. Typical sound Levels. Accessed at: http://www.soundoffmc.com/scienceOfNoise_typicalSoundLevels.php.
- Reckord, H. 1983b. That's the Way We Live – Subsistence in the Wrangell-St. Elias National Park and Preserve. Anthropology and Historic Preservation Cooperative Park Studies Unit, University of Alaska, Fairbanks. Occasional Paper No. 34.
- Reckord, H. 1983a. Where Raven Stood: Cultural Resources of the Ahtna Region. Occasional Paper No. 35, Cooperative Park Studies Unit, University of Alaska, Fairbanks.
- Reid, M. 2008. 2007 aerial moose survey Wrangell-St. Elias National Park and Preserve. Central Alaska Network. Unpublished memo, Wrangell-St. Elias National Park and Preserve, Copper Center, Alaska. 10pp.

Rinaldi, T.A. 2010. Influence of Linear Features and Snowmachine Activity on Resource Selection of Wolves, M.S. Thesis, University of Norther British Columbia.

Rinella, D.J. and D.L. Bogan. 2003. Ecological impacts of three lower Kenai Peninsula, Alaska, ATV stream fords. Alaska Department of Environmental Conservation, Division of Air and Water Quality, Anchorage, Alaska.

Roberts, B.C. and R.G. White. 1992. Effects of angler wading on survival of trout eggs and pre-emergent fry. N. Amer. J. Fish. Man. 12: 450-459.

Robertson, M.J, D.A. Scruton, R.S. Gregory, and K.D. Clarke. 2006. Effect of suspended sediment on freshwater fish and fish habitat. Canadian Technical Report of Fisheries and Aquatic Sciences 2644. Fish and Oceans Canada, St. John's NL, Canada.

Route, B. and B. Dale. No date. Abundance and composition of moose in northwestern Wrangell-St. Elias National Park and Preserve, Alaska. Report WRST-94-04. Wrangell-St. Elias National Park and Preserve Research and Resource Management. 20pp.

Sarafin, D.R. 2008. Abundance and Run Timing of Adult Salmon in Tanada Creek in the Wrangell-St. Elias National Park and Preserve, 2007. Annual Report no. OSM07-502. Wrangell St. Elias National Park and Preserve, Copper Center, Alaska. December 2007.

Schilling, E.C. and R.T. Harrison. 1994. Rock Creek Enduro Sound Tests, El Dorado National Forest, May 1993. U.S. Department of Agriculture, Forest Service, San Dimas Technology & Development Center. San Dimas, California.

Schwanke, R.A. 2008. Unit 11 Dall's sheep management report. Pages 16–31 in P. Harper, ed. Dall's sheep management report of survey and inventory activities 1 July 2004–30 June 2007. Project 6.0. Alaska Department of Fish and Game, Juneau, Alaska.

Schwanke, R.A. and B.W. Tobey. 2007. Units 11 and 13 furbearer. Pages 116–139 in P. Harper, ed. Furbearer management report of survey and inventory activities 1 July 2003–30 June 2006. Project 7.0. Alaska Department of Fish and Game, Juneau, Alaska.

Schwarz, C. C., S.D. Miller, and M.A. Haroldson. 2003. Grizzly bear. Pages 556–586 in G. A. Feldhamer, B. C. Thompson, and J. A. Chapman (editors). Wild mammals of North America. Johns Hopkins University Press, Baltimore, Maryland.

Scott, J.M. 2009. Wrangell St. Elias National Park and Preserve Visitor Use Patterns. Natural Resource Report NPS/MWR/HTLN/NRTR—2006/001. U.S. Department of the Interior National Park Service, Wrangell St. Elias National Park and Preserve, Copper Center, Alaska.

Servizi, J.A. and D.W. Martens. 1992. Sublethal responses of coho salmon (*Oncorhynchus kisutch*) to suspended sediments. Canadian Journal of Fisheries and Aquatic Sciences 49: 1389-1395.

Sigler, J.W., T.C. Bjornn, and F.H. Everest. 1984. Effects of chronic turbidity on density and growth of steelhead and coho salmon. Trans. Amer. Fish. Soc. 113: 142-150.

SMU (Saint Mary's University; Geo Spatial Services). 2008. Delineation and Attribution of Wrangell Saint Elias Park and Preserve Off-Road Vehicle Trails and Vegetation. Final Report and

Geodatabase. Pacific Northwest CESU Task Agreement #J8W07080004. Trail width GIS layer provided in 2009.

State of Alaska. 2009. Alaska Climate Change Strategy. Available at:
<http://www.climatechange.alaska.gov/cc-ak.htm>.

Stephenson, B. 1994. Wolf. Wildlife Notebook Series. Alaska Department of Fish and Game.
<http://www.adfg.state.ak.us/pubs/notebook/notehome.php>.

Stratton, L. 1982. Patterns of use of the Nelchina caribou herd. Alaska Department of Fish and Game, Division of Subsistence, Glennallen, Alaska. Available online at:
<http://www.subsistence.adfg.state.ak.us/TechPap/tp038.pdf>.

Stumpf, K. 2007. Wrangell-St. Elias National Park and Preserve Landcover Mapping Project. National Resource Technical Report NPS.

Terwilliger, M. 2005. WRST Dall's sheep (*Ovis dalli*) database. NPS data supplied by the park.

Terwilliger, M. and Gilmore, L. 2010. Invasive and Exotic Species Management for Wrangell-St. Elias National Park and Preserve—2009 Summary Report, Natural Resource Data Series NPS/WRST/NRDS—2010/023. February.

The Wilderness Society (TWS). 2006. Addressing the ecological effects of off-road vehicles (ORVs). Science and Policy Brief 3. Ecology and Economics Research Department, Boise, Idaho. August. 16 pp.

Tobey, R.W. 2007. Unit 11 brown bear management report. Pages 125–131 in P. Harper, ed. Brown bear management report of survey and inventory activities 1 July 2004–30 June 2006. Project 4.0. Alaska Department of Fish and Game, Juneau, Alaska.

Tobey, R.W. 2008a. Unit 11 moose management report. Pages 125–133 in P. Harper, ed. Moose management report of survey and inventory activities 1 July 2005–30 June 2007. Project 1.0. Alaska Department of Fish and Game, Juneau, Alaska.

Tobey, R.W. 2008b. Unit 11 black bear management report. Pages 149–154 in P. Harper, ed. Black bear management report of survey and inventory activities 1 July 2004–30 June 2007. Project 17.0. Alaska Department of Fish and Game, Juneau, Alaska.

Tobey, R.W. and R.A. Schwanke. 2008c. Unit 13 moose management report. Pages 151–164 in P. Harper, editor. Moose management report of survey and inventory activities 1 July 2005–30 June 2007. Alaska Department of Fish and Game. Project 1.0. Juneau, Alaska, USA.

U.S. Army Corps of Engineers, Alaska District. 2000. Southeast Alaska Freshwater Wetland Assessment Method. Version 1.4. August.

U.S. Census Bureau. 2000a. Profile of General Demographic and Selected Social and Economic Characteristics. Summary of general and selected 2000 Census data for the Chistochina, Mentasta Lake, and Slana CDPs. Available online at:
<http://labor.alaska.gov/research/cgin/cenmaps/cas/val.htm>.

U.S. Census Bureau. 2000b. P8. Hispanic or Latino By Race. Census 2000 Summary File 1 (SF 1) 100-Percent Data. Available online at: www.census.gov.

U.S. Census Bureau. 2000c. Table DP-3. Profile of Selected Economic Characteristics: 2000. Available online at: www.census.gov.

U.S. Census Bureau. 2000d. P53. Median Household Income in 1999 and P87. Poverty Status in 1999 by Age. Census 2000 Summary File 3 (SF 3) Sample Data. Available online at: www.census.gov.

U.S. Census Bureau. 1960. 1960 Census of Population, Volume 1 Characteristics of the Population, Part 3 Alaska. Available online at: <http://labor.alaska.gov/research/census/histpdfs/1960ak.pdf>

U.S. Census Bureau. 1973. 1970 Census of Population, Volume 1 Characteristics of the Population, Part 3 Alaska. January. Available online at: <http://labor.alaska.gov/research/census/histpdfs/1970char.pdf>

U.S. Census Bureau. 1981. 1980 Census of Population, Volume 1 Characteristics of the Population, Part 3 Alaska. November. Available online at: <http://labor.alaska.gov/research/census/histpdfs/1980inhab.pdf>

U.S. Census Bureau. 1992. 1990 Census of Population, Volume 1 Characteristics of the Population, Part 3 Alaska. April. Available online at: <http://labor.alaska.gov/research/census/histpdfs/1990char.pdf>

U.S. Fish and Wildlife Service (USFWS). 2007a. National bald eagle management guidelines. May 2007. 23 pp. <http://www.fws.gov/migratorybirds/baldeagle.htm>.

USFWS. 2007b. Alaska bald eagle nest atlas. U.S. Fish and Wildlife Service, Migratory Bird Management. <http://alaska.fws.gov/mbsp/mbm/landbirds/alaskabaldeagles/>.

USFWS. 2008. Birds of conservation concern. U.S. Fish and Wildlife service, Division of Migratory Bird Management, Arlington, Virginia. 87 pp.

Valkenburg, P. 1999. Caribou. Wildlife Notebook Series. Alaska Department of Fish and Game. <http://www.adfg.state.ak.us/pubs/notebook/noteshome.php>.

Veach, E.R., Markis, J.A., and M. McCormick. 2004. Water Quality Inventory of Denali National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve, Central Alaska Inventory and Monitoring Network. Wrangell St. Elias National Park and Preserve, Copper Center, Alaska.

Viereck, L.A., C.T. Dyrness, A.R. Batten, and K.J. Wenzlick. 1992. The Alaska Vegetation Classification. General Technical Report PNW-GTR-286. July.

Wiedmer, M. 2002. Lower Kenai Peninsula Summer Off-Road Vehicle Trail Stream Crossings. Alaska Department of Fish and Game, Habitat and Restoration Division. March 2002.

Winkler, G.R. 2000. A Geologic Guide to Wrangell–Saint Elias National Park and Preserve, Alaska: a Tectonic Collage of Northbound Terranes. Contributions by Edward M. MacKevett, Jr., George

Plafker, Donald H. Richter, Danny S. Rosenkrans, and Henry R. Schmoll. U.S. Geological Survey professional paper 1616. Available: <http://pubs.usgs.gov/pp/p1616/P1616-508.pdf>.

Wolfe, R.J. 2000. Subsistence in Alaska: A Year 2000 Update. Division of Subsistence, Alaska Department of Fish and Game. Available online at:
<http://www.subsistence.adfg.state.ak.us/geninfo/publctns/articles.cfm>.

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Glossary

All-terrain vehicle (ATV) – See Off-road vehicle (ORV).

Anadromous – Fish that hatch or rear in fresh water, migrate to the ocean (salt water) to grow and mature, and migrate back to fresh water to spawn and reproduce.

Benthic – Living in or on the bottom of a body of water.

Constructed non-motorized trail – A trail for non-motorized use created with brushing and tread construction along a designed and laid-out route, incorporating all elements for a sustainable trail, including curvilinear layout, grade control, integrated water control, durable tread surface, and integrating well into the environment. Construction may be mechanized and/or use hand crews. Non-motorized trails constructed with mechanized equipment would have a 4-foot tread. Non-motorized trails constructed with hand crews would be cleared of vegetation to a 4-foot width, and tread construction would only occur where necessary (such as sideslopes). Where necessary, bridges would be constructed across stream crossings.

Culvert – A pipe or box-like structure of wood, metal, plastic, concrete, or rock that conveys a watercourse under a tread.

Curb weight – The weight of an ORV without driver, passengers, or cargo, but with all its standard equipment and full fuel, oil and coolant tanks.

Curvilinear layout – Concept whereby the trail layout is designed to rise or descend gradually along natural contours. The alignment crosses the contours at a shallow angle so that the natural drainage patterns are easily maintained during the construction process.

Design-sustainable condition – Trail that meets a specific set of design criteria formulated to provide a high level of environmental protection and long-term utility of the tread surface under a managed program of anticipated use and normal climatic conditions, and receives regular maintenance to remain within its original design specifications.

Resident zone communities – In the vicinity of the analysis area for this ORV Management Plan/EIS, these include Chistochina, Mentasta Lake, Nabesna, and Slana. Other resident zones communities for the Wrangell-St. Elias National Park include Chisana, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Northway, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat (36 CFR 13.1902).

Grade – Relative steepness (rise and fall) of the trail as compared to a flat horizontal plane. Trail steepness is measured in grade as a percentage.

Grade control – Part of trail construction whereby trail grade restrictions are placed in the design parameters, primarily to minimize erosion due to natural forces and trail users.

Hardening – Any number of methods of strengthening a tread surface in response to degradation or to better accommodate a particular type of use. Examples include: aggregate capping or the use of porous pavement panel.

Herbaceous – Containing less than 10 percent tree cover and less than 25 percent shrub cover. These communities can be dominated by graminoids (grasses or sedges), forbs (broad leaved herbs), or bryoids (bryophytes or lichens).

Integrated water control – Instituting water management into basic trail design, usually during construction.

Lacustrine – Pertaining to, produced by, or formed in a lake.

Lacustrine Wetlands – Lacustrine wetlands are essentially lakes, and are defined as wetlands situated in a topographic depression or dammed river channel, that lacks vegetation and has a total area that exceeds 20 acres in size.

Large woody debris (LWD) – Large pieces of wood, generally greater than 10 centimeters in diameter, in aquatic environments.

Macroinvertebrates – Animals without backbones that are big enough to see with the naked eye. Examples include most aquatic insects, snails, and crayfish.

Maintainable condition – Trail that only partially meets design-sustainable criteria (see Design-sustainable condition), but with a reasonable level of mitigation and maintenance can support a managed level of use without unacceptable environmental degradation or a decrease in travel surface utility.

Mesic – Of, or adapted to, a temperate, moderately moist habitat.

Nephelometric turbidity unit – A measure of the clarity of water. Turbidity in excess of 5 NTU is just noticeable to the average person.

Non-motorized route – A passage through the terrain between two points for non-motorized use created after route reconnaissance to check for viability or safety considerations. No tread construction occurs. The route may be marked at key locations with rock cairns, carsonite posts, or other minimal marking techniques to provide reassurance to users and to guide passage through challenging sections. Most routes cross higher elevations with minimal brushy vegetation. A non-motorized route involves no tread construction. Where necessary, some brushing may occur and would be done to a 4-foot width. Routes require some navigational skills, and conditions such as stream crossings may be highly variable. No bridges are constructed.

Off-road vehicle (ORV) – Any motor vehicle, including all-terrain vehicles, designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, wetland, or other natural terrain, except snowmachines or snowmobiles.

Palustrine Emergent Wetlands (emergent) – Emergent wetlands are characterized by erect, rooted, herbaceous hydrophytes that are typically present for most of the growing season.

Palustrine Forested Wetlands (forested) – Forested wetlands contain woody vegetation that is 6 meters tall or taller.

Palustrine Scrub-Shrub Wetlands (scrub-shrub) – Scrub-shrub wetlands are dominated by shrubs, young trees, or mature trees that have been stunted due to environmental conditions. Vegetation is typically less than 6 meters tall.

Palustrine Unconsolidated Bottom and Aquatic Bed Wetlands (ponds) –Ponded palustrine wetlands that have at least 25 percent bottom cover of particles smaller than stones and a vegetation cover of less than 30 percent are considered to have unconsolidated bottoms. Ponded wetlands that tend to have deeper water and are dominated by plants that grow principally on or below the surface of the water for most of the growing season are considered to have aquatic beds.

Pass – A narrow linear delimited surface area showing ground disturbance resulting from the single passage of an ORV.

Permafrost – Permanently frozen ground (subsoil), which may be continuous in more northern areas or discontinuous in more southerly areas.

Porous Pavement Panel (PPP) – A permeable, rigid, multi-pocketed structural geogrid, typically plastic, that is used to harden areas of saturated or unstable soils without the use of gravel infill, bridges, or boardwalks. One example is GeoBlock, a trademark name structural geogrid material.

Recreational ORV use – Any off-road vehicle (ORV) use by individuals not engaged in subsistence uses as defined in 36 CFR 13.420. Generally, most recreational ORV use in the analysis area (85%) consists of access to sport hunting in the national preserve, but ORVs are also used in the area to access sport fishing and dispersed camping.

Riverine Wetlands – Riverine wetlands are freshwater wetland habitats contained within a channel, which are not dominated by trees, shrubs, emergents, moss, or lichens; and do not contain ocean derived salts in excess of 0.5 percent.

Sustainable trail – A trail that conforms to its terrain and environment, is capable of handling its intended use without serious degradation, and requires minimal maintenance.

Sport hunting – Any hunting done under State of Alaska hunting regulations, as opposed to Federal subsistence regulations. Sport hunting is limited to the national preserve.

Thermokarst – Settling or caving of the ground due to melting of ground ice or permafrost.

Trail blading – Passing of small machines equipped with dozer blades to create a single trail tread.

Tread – The wear surface of the trail upon which a user travels.

Waterbar – A trail structure typically constructed of wood, rock, or reinforced rubber and soil that is set at an angle across tread to direct water off the tread.

Zone of Visual Influence (ZVI) analysis – Process, usually performed in GIS, of identifying the areas from which features of interest might be visible.

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