

National Park Service
U.S. Department of the Interior

Glacier Bay National Park and Preserve
Alaska



Finding of No Significant Impact

Glacier Bay National Preserve Off-Road Vehicle Use Plan Environmental Assessment

August 2007

Recommended:

Tomie Patrick Lee
Superintendent, Glacier Bay National Park and Preserve

08/07/2007
Date

Approved:

[Signature]
Regional Director, Alaska

8/8/2007
Date

FINDING OF NO SIGNIFICANT IMPACT

Glacier Bay National Preserve Off-Road Vehicle Use Plan Glacier Bay National Park and Preserve August 2007

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate designation of off-road vehicle (ORV) trails and routes and to manage ORV uses in Glacier Bay National Preserve. The purpose of the resulting management plan is to authorize and regulate the use of ORVs on specific trails and routes in the Preserve in support of commercial fishing as well as other purposes (i.e., subsistence or recreational activities) while minimizing and correcting damage to Preserve resources and values. Existing trails/routes that duplicate access or cause extensive resource damage may be closed. Repair strategies for trail segments in poor condition or contributing to resource damage along designated trails/routes will be developed. The designation of ORV trails and routes and the expansion of allowable ORV uses will be authorized through special regulations. A proposed special ORV regulation for the park was published in the Federal Register on December 27, 2006. A final approved regulation is expected by late 2007.

The ORV plan is needed to designate ORV trails or routes, broaden authorized ORV use from commercial fishing only to other users and purposes, and to develop strategies to repair and maintain designated routes. From a practical standpoint, it is difficult to distinguish between uses for commercial fishing purposes and other uses, such as subsistence, recreation, or general travel, often by the same individuals. Therefore, the NPS proposes to designate ORV trails and routes for all users. The plan will change direction given in the 1984 General Management Plan (NPS, 1984) by recognizing a broader user group and increasing the use of public lands for a variety of purposes. The plan is considered a GMP amendment.

The NPS has selected Alternative 3 (NPS Preferred Alternative) with modifications which will authorize ORV use on 63.15 miles (75.6%) of trails or routes and close 20.35 miles (24.4%) of existing trails and routes to ORV use. ORV use off designated trails/routes will be prohibited. The selected alternative was modified to open the upper most Dog Salmon Creek Estuary route (about 0.25 mile of trail) with two stream crossings to ORV use.

An attachment to the FONSI provides NPS's responses to substantive comments received during the comment period. Seven written comments were received during the 47-day public comment period.

ALTERNATIVES

Three alternatives were evaluated in the EA.

Alternative 1: No Action

Under the no-action alternative 83.5 miles of trails and routes in the Dry Bay Area of Glacier Bay National Preserve would be open to off-road vehicle use. Commercial fisherman may continue to use ORVs in all areas of Dry Bay in support of commercial fishing. Other ORV users, such as lodge operators and guests, would continue to be restricted to existing trails under a permit.

Management of the existing trail system would remain unchanged. Trail closures, annual trail maintenance activities, or stream crossing improvements would not be undertaken.

Fifteen stream crossings would remain open to ORV use under the no-action alternative. The following table identifies stream crossings occurring on individual trails open to ORV use under the no-action alternative.

Stream Crossings Open Under Alternative 1

Trail	Water Course	Number of Crossings Per Trail
Main Trail East	Upper Dog Salmon Creek	1
DSC Trail	Middle Dog Salmon Creek	1
DSC Trail	Unnamed Drainage	2
DSC Estuary Routes	Lower Dog Salmon Creek	5
Varni East Trail	Small Unnamed Drainage	1
East Access Trail	Lake Outlet Crossing Southwest of EAR	1
Doame Trail	East Alsek River (EAR)	1
Doame Trail	Small Unnamed Drainage	1
Doame West Route	Doame River delta	1
Doame East Trail	Doame River delta	1

Alternative 2: Designate Trails/Routes Directly Incident to Commercial Fishing and Authorized Under Concession Contracts.

Alternative 2 would designate trails and routes in the Dry Bay area of Glacier Bay National Preserve for ORV uses that are (1) directly incident to the exercise of valid commercial fishing rights and privileges (access to fishing sites, campsites, cabins, boat landing areas and airstrips) and/or (2) provide access and rights to existing lodges authorized under concession contracts or (3) provide access to the NPS East River visitor use cabin. Trails or routes not meeting these criteria or that provide duplicate access or have a high potential for environmental damage would not be designated.

This alternative would authorize ORV use on 58.7 miles (70.3%) of existing trails/routes and close 24.8 miles (29.7 %) of existing trails/routes to ORV use. Designated trails and routes would be open to ORV use for commercial fishing activities and other purposes. ORV use off designated trails/routes would be prohibited.

The following trails and routes would be designated and open for ORV use under Alternative 2.

- Alsek Mouth Route
- Alsek North Trail to Tractor N. Trail
- Bear Island Trail
- Boring Trail
- Dog Salmon Cutoff Trail
- DSC Estuary Routes
- Dunes Route
- East Cabin Trail
- East Mouth Routes
- Flowers Trail
- Main Trail East
- Main Trail South
- Maze Central Route
- Maze West Route
- McSpaden Trail
- Pellett Trail
- Plains North Trail
- Plains South Trail
- Ranney Route
- River Route
- Rohloff Trail
- Schumacher Trail
- Seafoods Routes
- Sean Dog Trail
- Smitty's Trail
- Takeout Trail
- Temporary Camps Estuary Routes
- Temporary Camps Routes
- Varni West Trail

Four ORV stream crossings would remain open under Alternative 2. Trail closures would result in 11 ORV stream crossings being closed.

Stream Crossings Open Under Alternative 2

Trail	Water Course	Number of Crossings Per Trail	Number of Stream Improvements
Main Trail East	Dog Salmon Creek	1	1
DSC Estuary Routes	Dog Salmon Creek	3	0

Prescriptive actions for stream crossing improvements would be taken at one anadromous fish stream. Dog Salmon Creek on the Main East Trail would require stream crossing improvement. Stream bed and bank hardening with porous pavement panels such as Geoblock[™] or other trail hardening methods would bring treated areas to a sustainable level due to the resistant nature of the treated tread surface. Trail widths at existing stream crossings would be kept to a maximum of 10 feet.

Three ORV routes crossing the Dog Salmon Creek, in the estuary area, would remain open but would not be improved through stream bank and bed hardening. Any stabilization efforts would probably be washed away since the estuarine area is heavily influenced by tides and shifting sand substrate.

Alternative 3: Designate Trails/Routes Directly Incident To Commercial Fishing, Authorized Under Concession Contracts, And For Other Purposes (NPS Preferred Alternative).

Alternative 3 would designate trails and routes in the Dry Bay area of Glacier Bay National Preserve for ORV uses that are (1) directly incident to the exercise of valid commercial fishing rights and privileges (access to fishing sites, campsites, cabins, boat landing areas and airstrips) (2) provide access and rights to existing lodges authorized under concession contracts, (3) provide access to the NPS East River visitor use cabin, and/or (4) provide access for other purposes (i.e., recreation, subsistence, hunting, and sport fishing). Trails or routes not meeting these criteria or that provide duplicate access or have a high potential for environmental damage would not be designated.

This alternative would authorize ORV use on 62.9 miles (75.3%) of trails or routes and close 20.6 miles (24.7%) of existing trails and routes to ORV use. Designated trails and routes would be open to ORV use for commercial fishing activities and other purposes. ORV use off designated trails/routes would be prohibited.

Trail designations in Alternative 3 would be the same as Alternative 2 except that an additional 4.2 miles of trail would be opened to provide access for other purposes. These include the following trails in addition to those identified in Alternative 2.

- Alsek North Trail Extending upstream of Tractor North Trail
- Tractor North Trail
- East Cabin North Trail
- East Access Trail

Five ORV stream crossings would remain open under Alternative 3. Trail closures would result in 10 ORV stream crossings being closed. The following table identifies stream crossings occurring on individual ORV trails open under Alternative 3.

Stream Crossings Open Under Alternative 3

Trail	Water Course	Number of Crossings Per Trail	Number of Stream Improvements
Main Trail East	Dog Salmon Creek	1	1
DSC Estuary Routes	Dog Salmon Creek	3	0
East Access Trail	Lake Outlet Southwest of EAR	1	1

Prescriptive actions for stream crossing improvements would be taken at two anadromous fish streams. Specific streams requiring improvements include the Dog Salmon Creek on the Main East Trail and the Lake Outlet crossing southwest of EAR on the East Access Trail. Stream bed and bank hardening with porous pavement panels such as Geoblock[™] or other trail hardening methods would bring treated areas to a sustainable level due to the durability of the tread surface. Trail widths at existing stream crossings would be kept to a maximum of 10 feet.

Three ORV routes crossing the Dog Salmon Creek, in the estuary area, would remain open but would not be improved through stream bank and bed hardening. Any stabilization efforts would probably be washed away since the estuarine area is heavily influenced by tides and shifting sand substrate.

PUBLIC INVOLVEMENT

The EA was released for a 47-day public comment period from April 2, 2007 to May 18, 2007. The EA was sent to 93 agencies, organizations, and individuals and was posted on the NPS Planning, Environment, and Public Comment website.

Comments were received from 3 individuals, the State of Alaska, and 3 environmental organizations. The comments did not change the conclusions in the EA concerning environmental effects of the proposed action. NPS responses to substantive public comments are attached to the FONSI.

Two environmental groups supported both Alternatives 2 and 3. One commenter supported a modified Alternative 3 that would limit ORV use to a narrower group. Several commenters preferred Alternative 2 because it would designate the least amount of trail open to ORV use. However, one commenter preferred that alternative 2 only support ORV use for commercial fishing and concession activities and be modified for trail designation only. One commenter preferred that the NPS take no action, because several trails proposed for closure are important for commercial fishing purposes and should remain open to trucks and ORVs.

DECISION

The NPS decision is to select Alternative 3 (NPS Preferred Alternative), with one modification and with mitigating measures (See attached maps delineating designated trails/routes). The modification to Alternative 3 will leave the upper most Dog Salmon Creek Estuary Route (about 0.25 mile of trail) with two stream crossings open to ORV use.

MITIGATING MEASURES

Fish Habitat: Improvement of ORV stream crossings (streambed and bank hardening) will be conducted in accordance with Alaska Department of Natural Resources Fish Habitat Permit stipulations.

Visitor Education: The NPS will develop a program for educating local users about the selected alternative and associated special regulations. The program will include a mechanism for regular local input to assist the park in implementing the proposal, and to develop commercial fishing and concessions permit conditions that support regulations and appropriate trail use.

Cultural Resources: If cultural resources are discovered during trail maintenance or construction activities, the site will be protected and the activities would stop until the park archeologist can be notified and has the opportunity to evaluate the site.

RATIONALE for the DECISION

The modified Alternative 3 was selected because it will designate specific ORV trails and routes in the Preserve that provide access for commercial fishing purposes, access to lodges under concession contracts and access for other purposes while protecting areas having a high potential for environmental damage from repeated ORV use. Designated trails and routes will be open to ORV use. ORV use off designated trails or routes will be prohibited.

The modified Alternative 3 provides for the continued exercise of commercial fishing rights and privileges as authorized in section 205 of ANILCA. Trails and routes providing access to commercial fishing sites, campsites, cabins, boat launch areas, and airstrips supporting commercial fishing activities are designated for ORV use. Only those trails/routes providing duplicate access to the same location or facility or have a high potential for environmental impacts would be closed to ORV use. Alternatives 1, 2 and 3 meet the provisions of section 205 of ANILCA.

The 1984 General Management Plan (GMP) emphasized the need to protect the area's resources by preventing land use levels from expanding beyond 1979 levels. A 25-percent increase in the use of public lands was established in the GMP as a measure of significant expansion in the Dry Bay area. An estimate of the minimum extent of trails that existed in the early 1980s is 61.1 miles (Fig. 3-1 of EA). The modified alternative will designate 63.15 miles of ORV trails/routes which is comparable to the early 1980 levels and within the GMP's 25-percent significance guideline. The designation of 58.7 miles of ORV trails/routes under Alternative 2 would also be comparable to the extent of trails existing in the early 1980s. The no-action alternative with its existing ORV trails system (83.5 miles of ORV trail) contains about 37 percent more ORV trail than existed in the early 1980s. This level of trail expansion is well beyond the 25-percent level established in the GMP as indicating significant land use expansion.

The modified Alternative 3 designates ORV trails for other purposes in addition to those designated for commercial fishing purposes and providing access to lodges authorized under existing concession contracts. ORV use for other purposes (i.e., sport fishing, hunting, trapping, subsistence, and recreation) is not authorized under current regulations. These uses occur coincidentally with commercial fishing or concession lodge activity. Four trails providing ORV access for other purposes will be designated under the modified alternative. These include the Alsek North Trail Extending upstream of Tractor North Trail, Tractor North Trail, East Cabin North Trail, and the East Access Trail. These trails are rated in generally "Good" condition. Alternative 2 would not designate these trails as open for ORV use.

The modified Alternatives 3 will use a combination of trails closures and stream crossing improvements to protect fish habitat, water quality, and wetlands. The alternative will close ORV trails and routes crossing anadromous streams that are environmentally sensitive. These include the DSC Trail, Varni East Trail, and the Doame Trail complex. After trail/route closure these degraded habitats will be allowed to recover naturally. The uppermost Dog Salmon Creek Estuary Route will remain open to ORV use. This will help maintain access between the Temporary Camp Zone and the Dog Salmon airstrip for commercial fishing purposes when high water will make the lower DSC estuary routes impassable. The difference between the

alternatives is that Alternative 2 would also close the northern most DSC estuary route and East Access Trail. Under the modified Alternative 3 these trails will remain open and a stream crossing improvement will be placed in the Lake Outlet crossing southwest of the East Alsek River (EAR) to protect habitat. Both alternatives would provide a stream crossing improvement for Dog Salmon Creek on the Main Trail East.

SIGNIFICANCE CRITERIA

The selected alternative will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria defined in 40 CFR Section 1508.27.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

ORV effects on water quality would be negligible because about 25 percent of trails would be closed including 8 stream crossings. Closure of key trails across more heavily impacted water crossings would have a measurable and net positive benefit on water quality. Five stream/estuary crossings and the deepwater route across the estuary would remain open. Several of the stream crossing closures would have a measurable and net positive effect on biota and habitat. However, it would take some time (e.g., years to decades) for these areas to naturally revegetate and for stream crossings to become stabilized.

The selected alternative would have a moderate, long-term, beneficial impact on vegetation and wetlands. ORVs on open trails would not result in any additional loss of vegetation while trail/route closures would allow for the natural recovery of about 36 acres of previously disturbed vegetation, including up to 17 acres of wetland. Trails to remain open would harbor the greatest concentrations of invasive plants due to dispersal of seeds and plant material on clothing, gear, and vehicles.

Closure of the Doame Trails complex would mitigate adverse ORV effects on natural wetland drainage structure and function and minimize effects on habitat and biota. Although incised tracks would likely persist and trap fish for some time these features would diminish over time as a result of sediment accumulation and vegetative recolonization.

Effects to wildlife from ORV induced habitat loss and disturbance would be minor. The level of human use would occur in the same basic locations and at the same frequency except for habitats in the Doame River area which would benefit from reduced ORV disturbance. Disturbance related effects would be temporary and localized.

The amount and type of ORV uses in Dry Bay would not change significantly. The level of additional recreational use impacting wildlife would probably not increase significantly nor would it shift to new locations. The majority of use such as hunting and sport fishing would continue to be incidental to commercial fishing. About 29 percent of Dry Bay habitats currently altered by ORV trails and routes would eventually re-establish themselves as a result of trail closures.

The selected alternative would have a minor negative effect on visitor use due to the closure of 20.35 miles of trails and routes. ORV access across the western portion of the Preserve would benefit from regular trail maintenance. Access to the eastern portion of the Preserve would be reduced due to trail closures in the Doame River area.

Hunting activity may increase slightly along designated routes resulting in a sense of crowding and competition as a result of trail closures in the Doame River area. Visitors hiking on closed trails may have an increased chance of close encounters with wildlife particularly bear and moose. Until closed trail corridors fill with alder and willow brush they may provide improved hunting or trapping opportunities as wildlife may travel these corridors undisturbed by vehicles and they will provide easy foot access.

The selected alternative would have a negligible long-term impact on commercial fishing in the National Preserve. The trail network would continue to provide access to commercial fishing areas and infrastructure while trail maintenance would improve the network used by commercial fishermen. The majority of the trails and infrastructure in the Dry Bay area were primarily established to support commercial fishing purposes and are a benefit to this activity.

(2) The degree to which the proposed action affects public health or safety.

The proposed action would not affect public health or safety.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.

The project area is located in Glacier Bay National Preserve. The landscape in the Dry Bay area is dynamic. Numerous north-south oriented stream channels drain wetlands throughout the Preserve. These streams all discharge into the common East Alsek River/Doame River estuary. The outlet to this common estuary has been migrating northwest. Coastal sandy areas are affected by massive storms from the North Gulf of Alaska, including wave surges and strong winds. Glaciers and ice dams have blocked the Alsek and Tatshenshini Rivers; sudden breaches of the natural blockages have subsequently breached the dams and flooded the lowlands in the Dry Bay area during geologically recent times. Furthermore, heavy rains in the area provide tremendous moisture to the soils and sediments, which feeds drainages such as the East Alsek River, Doame River, Dog Salmon Creek, and other smaller streams. These unique characteristics would not be affected by the selected alternative.

(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

ORV use across streams, wetlands, and areas that contain poorly drained or saturated soils is controversial. Repeated ORV use in these areas can cause extensive environmental damage. The selected alternative closes trails and routes that have a high potential for environmental damage from repeated ORV use. Stream crossings to remain open would be stabilized and maintained to minimize damage.

The closure of ORV trails and routes that are used for commercial fishing purposes is also controversial. The selected alternative only closes trails and routes that provide duplicate access to the same location, facility, or lodge. Access to campsites, cabins, and airstrips directly incident to commercial fishing rights and privileges was maintained.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The effects of the selected alternative do not involve unique or unknown risks.

(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.

Designation of ORV trails and routes in Glacier Bay National Preserve would not establish a precedent for future actions or represent a decision on principle about a future consideration. Section 205 of ANILCA authorized the use of motorized vehicles directly incident to the exercise of commercial fishing rights and privileges.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

The action is not related to other actions with individually insignificant but cumulative significant impacts.

(8) Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The selected alternative would not adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places. There are no known cultural or archeological resources which would be affected by ORV trail or route designation. No known scientific resources would be adversely affected by trail designation.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

The selected alternative would not adversely affect an endangered or threatened species or its habitat. The threatened Steller sea lion occasionally occurs within the project area. Informal consultation with National Marine Fisheries Service has determined that the action is not likely to affect sea lions.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The selected alternative would not violate any Federal, State, or local law.

FINDINGS

The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park.

The designation of ORV trails and routes under the selected alternative complies with Executive Order 11644. The continued use of 63.15 miles of existing ORV trails and routes in support of valid commercial fishing rights and privileges as specified in Section 205 of ANILCA and other purposes will not affect the natural, aesthetic or scenic values of the Preserve. The selected alternative will close 20.35 miles of existing ORV trails/routes which will be allowed to revegetate naturally thus improving the natural, aesthetic and scenic values of the Preserve. Trail maintenance on segments of designated trails in a degraded condition will also improve the aesthetic values of the area while allowing the exercise of commercial fishing activities.

The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990. There will be no restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

The National Park Service has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.

**NPS RESPONSES TO PUBLIC COMMENTS and ERRATA
for the
GLACIER BAY NATIONAL PRESERVE ORV
ENVIRONMENTAL ASSESSMENT**

In response to the environmental assessment, the NPS received comment letters/statements. Described below are substantive comments and the NPS responses.

Comment 1: The roads that seem to have caused the most damage to the fish resource are the ones that have been added more recently. I feel the most damaging road is the East Cabin North Trail. Road gets much use by sport fishermen during spawning season. In shallow parts of the East Alsek canoes are dragged over river gravel bars through spawning areas.

Closure of the East Cabin North Trail because a lodge uses the trail for access to float the East Alsek River would eliminate ORV access to this area for other purposes (i.e., recreation, hunting, trapping, and fishing). If floating the East Alsek River caused environmental degradation to Preserve resources, closing the specific activity through the concession permitting process would be more appropriate than closing the trail to all ORV users. In addition, the East Cabin North Trail was rated in good condition and can support continued ORV use at existing levels without degradation of Preserve resources and values.

Comment 2: If you close the Doame River trails there is no reason to leave the East Access Trail open. Closing this would eliminate another stream crossing and protect fish.

The East Access Trail provides additional access to the western bank of the East Alsek River. As the trail itself is in good condition with low risk of habitat damage, the NPS determined to keep this trail segment open to provide additional access to the river.

Comment 3: The EA indicated that the NPS has not made a determination as to whether ORVs were traditionally used for subsistence purposes in the Preserve. Appendix E, however, states ORVs are not recognized as customary and traditional means to access the Preserve. We assume the statement in Appendix E refers to Customary and Traditional (C&T) Determinations for the Game Management Unit by the Federal Subsistence Board and not a subsistence use determination for the Preserve. If so, we request that be clarified in the final document.

The following sentences on page E-7, paragraph 8, last sentence and page E-8, paragraph 1, last sentence have been deleted from the text to clarify the conflicting text.

“ORVs are not recognized as customary and traditional means of access for subsistence in the National Preserve.”

The following text has been added to both locations:

The NPS has not made a determination as to whether ORVs were traditionally used for subsistence purposes in the Preserve.

Comment 4: Before the NPS can consider the use of ORVs as a means of access for subsistence purposes as part of its proposed ORV plan, it is obligated to undertake a formal traditional/nontraditional use determination for the Preserve.

The authority used to designate Preserve ORV trails and routes for general travel, recreation, hunting under state regulation, sport fishing as well as subsistence is 36 CFR Section 4.10., not ANILCA Section 810(a).

Comment 5: The expansion of legal ORV use from only commercial fishing to other uses makes us uneasy. Nonetheless, we agree with the EA that the practicality of distinguishing between various uses on the ground is difficult and problematic. We appreciate that Glacier Bay is using the appropriate method to reach this goal (36 CFR 4.10(b)).

Designating ORV trails and routes in the Preserve is to provide access for commercial fishing and other uses including general travel. ORVs will only be permitted on designated trails and routes, and this does not include travel off of existing tracks. No new trails or routes will be created.

Comment 6: The key to success is insuring illegal ORV use does not occur on closed trails. The EA left us wanting to know more about the actions that will be taken to close trails as well as rehabilitation and restoration of these trails. We request that the final EA contain more specific plans on how trail closures will be implemented.

The specific implementations necessary to close and restore trails are being developed by park staff. Trail closures would be announced through public news release and permittee letters with maps, closure information in user permits, signs, barriers, and regulation enforcement by onsite rangers. Trails to be closed will be blocked and posted, until evidence of the trail is obscured. As the Dry Bay area is undergoing rapid successional change seeding or transplanting native species may not be necessary. Most closed trails will be left to natural restoration. Trails will be monitored for invasive plants until disturbed ground is colonized by native species. Including this level of detail in the EA was not required to complete the impact analysis or to select the proposed action.

Comment 7: In addition to addressing stream crossings as a component of designating trails, we would also like to see trail safety and trail degradation treatment planned as part of this plan, thus occurring in the near future rather than deferred 3-5 years out. We request the final plan includes detailed information on how open trails will be managed to keep habitat destruction to a minimum.

Trail maintenance and repair prescriptions are being developed by park staff and will be implemented over the next 3-5 years. The NPS Facilities Maintenance Management System funding cycles determine the schedule of work. These cycles are prepared at a minimum of 3 years ahead. Significant funding and staffing to carry out repair and maintenance of Dry Bay ORV trails will occur in FY 2008.

Comment 8: ORV routes are described in the EA as areas in which ORV users are free to choose their own lines. This license to roam defeats the purpose of the ORV plan. ORVs should be confined to designated well-marked trails only.

ORV routes differ from trails in that ORV routes vary in location from year-to-year depending on climatic and environmental conditions. ORV routes are ephemeral in that they are washed away or covered by sand at least once every year. Precise ORV routes would be established on an annual basis by the NPS. The NPS would delineate specific on-the-ground routes at the beginning of each summer season depending on environmental conditions. Routes would be designated by markers. Route designations would be made annually for the River Route, Dunes Route, Maze West Route, Maze Central Route, East Mouth Route and Lower Dog Salmon Creek (DSC) Estuary Route.

ORV users are not “free to choose their own lines” in the Preserve except within the Temporary Camps Zone where seasonal campsites may shift in response to changing terrain. When new commercial fishing sites or new temporary camps are established, temporary access trails would be approved by the NPS. Temporary access trails would take the least environmentally disturbing, shortest and most direct route possible from an authorized/existing trail/route to the new camp or fishing site. Access trails would be closed after the fishing site or camp was abandoned.

Comment 9: We recommend that there be no designated ORV “routes” in the Preserve. In the dunes and plains region, the Dunes Route and Maze West Route of alternatives 2 and 3 should be well marked ORV trails. The sand dunes themselves should be permanently off-limits to ORVs.

Please see the response to Comment 8 regarding the difference between trails and routes. In the dunes and plains regions of the Preserve maintaining permanent trails is not feasible due to seasonal flooding, shifting stream channels and wind. Routes however will be scouted and clearly marked by NPS staff each year before the user season begins. The specific location of a route can shift in response to changing conditions or to avoid sensitive habitats. Impacts from ORV travel in these areas are usually obliterated within a season or several years at most. Routes to be designated in the Dunes and Plains region include:

<i>Alsek Mouth Route</i>	<i>Maze Central Route</i>
<i>Dunes Route</i>	<i>East Mouth Route</i>
<i>Maze West Route</i>	<i>Temporary Camps Routes</i>

Comment 10: The Varni East trail should be restricted or open to historical truck use. The roads in Dry Bay have been degraded by the advent of ATVs especially at stream crossings where riders will veer off the main track to avoid deep water. This route is a link to our commercial fishing boats and equipment. It is our main access to Rudy’s airstrip serving both commercial fishing and lodge activity.

Commercial fishing boat haulouts can be accessed using the Varni West Trail. Sections of the Varni East Trail are degraded to very degraded, and contribute to significant habitat damage.

Maintenance of these trail segments for either ATV or truck use would probably not reduce ongoing habitat damage because of the soils and influence of seasonal flooding.

Comment 11: The inland route to Ranney camp should be left open because of its historical use for access to commercial fishing interests.

Access to the Ranney camp will still be possible through the East Alsek Estuary and the Doame River Delta using the Ranney Route where impacts from ORV passage are erased by wind and tide. Sections of the Doame, Doame West, and Doame East Trails are classified from degraded to very degraded, and the trails have entrained surface streams potentially stranding fish and aquatic invertebrates. Repairing these segments would not be possible given the local hydrology and seasonal water level.

Comment 12: Recreational use of ORVs, both for individual and commercial purposes should not be allowed in National Park Service units. The plan should not be amended to broaden the authorized user group. Travel should be on designated trails or routes only. In ANILCA a narrow special exception in Section 1110(a) for use of motorized vehicles for certain purposes, the exception applied only to airplanes, motorboats, and snowmachines, not summer ORVs, not for recreational purposes and certainly not for non-consumptive recreation.

36 CFR Section 4.10 (Travel on park roads and designated routes) provides the NPS the authority to designate off road motor vehicle routes and areas via special regulations in national preserves. Special regulations are being drafted to permit access by ORV to areas within the National Preserve on designated trails and routes for general travel. ORVs will NOT be permitted off trails or marked routes regardless of type of use. The "recreational use" that currently occurs and that is expected to continue includes sport fishing, hunting under state regulations, trapping, and travel to and from cabins and camps on existing trails. These uses are primarily incidental to commercial fishing and concession lodge operations by resident permittees.

Comment 13: The EA fails to assess the impact of its alternatives on natural quiet and the opportunity to hear and enjoy natural sounds. Just because Dry Bay is not a big "W" designated wilderness, many visitors hope and expect to be able to enjoy wilderness values regardless of whether those lands have been officially designated.

Natural sound predominates in Dry Bay for a majority of the time. The effects are negligible to minor because the number of ORVs in actual use is low and relatively stable and occurs along established routes. The frequency of use is limited by terrain, weather, tides, and cost of fuel, and is also focused around cabins or campsites, concession lodges, boat launches, net sites, and airstrips. Visitors can easily reach areas in the Preserve where ORV noise is absent.

Comment 14: There is insufficient information in the EA about the use of ORVs by the lodges to demonstrate that their use is needed. There is no magic that makes recreational ORV use acceptable by lodge clients when it's not acceptable, as we strongly believe, for private individuals.

The three concession lodges are only accessible by ORV, boat, or small aircraft using existing landing strips. Landing strips are not necessarily located close to a lodge, requiring some surface transport. Many trail segments cannot accommodate full sized passenger vehicles. Lodges use ORVs to provide clients access to the East Alsek River and Estuary, the Alsek River, Doame River Delta and the Gulf of Alaska for fishing, hunting, wildlife viewing, and photography. Lodges are also managed by the NPS under specific concession permits which define the size and scope of guest services, including ORV use.

ERRATA

1. Appendix E, Page E-7, 2. Restriction of Access: Alternative 2 - last sentence. *The following sentence has been deleted to clarify the conflicting text.*

“ORVs are not recognized as customary and traditional means of access for subsistence in the National Preserve.”

The following text has been added at the same location.

The NPS has not made a determination as to whether ORVs were traditionally used for subsistence purposes in the Preserve.

2. Appendix E, Page E-8, 2. Restriction of Access, Alternative 3 - last sentence. *The following sentence has been deleted to clarify the conflicting text.*

“ORVs are not recognized as customary and traditional means of access for subsistence in the National Preserve.”

The following text has been added at the same location.

The NPS has not made a determination as to whether ORVs were traditionally used for subsistence purposes in the Preserve.



