

# STATE OF ALASKA

**SARAH PALIN, Governor**

## **ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting**

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November 7, 2008

USDA-Forest Service  
Carol Goularte, District Ranger  
204 Siginaka Way  
Sitka, AK 99835

Dear Ms. Goularte:

The State of Alaska reviewed the Outfitter/Guide Allocation on Sitka Area Roads and Trails Environmental Assessment (EA). The following comments represent the consolidated views of state agencies.

The State appreciates the Sitka Ranger District's decision to provide the public with this additional review opportunity of the EA. We agree that doing so makes for a better public process by ensuring the public is more fully informed to provide meaningful comments on the proposed action. While our comments are in part informative, they also include requests for additional information or clarification in the final decision document.

### **Section 810 Analysis**

The analysis included in the EA is very limited and offers no information regarding subsistence uses, nor supporting rationale for the decision that "*No significant restrictions on the abundance and distribution of, or competition for subsistence resources in the project area are anticipated.*" While we do not expect subsistence resources or access to be significantly impacted by the proposed action, we request the final decision document include the supporting information and analysis on which the decision was based, per the Alaska National Interest Lands Conservation Act and Forest Service Policy.

### **Trailhead Parking**

Some of the trails proposed for continued commercial use lack adequate trailhead parking capacity and could impact state roads, especially if larger passenger vans or vehicles with trailers become a regular occurrence at trailheads. Congested trailhead parking often forces vehicles to park along state roads. Stationary obstacles on roadway shoulders, such as parked vehicles, increase the likelihood of injury or damage if a vehicle leaves the roadway. In addition, wide shoulders are designed to accommodate bikes, and vehicles parked in these areas force bikes into the relatively-high-speed roadways, decreasing safety for bikers and vehicle operators. Vehicles parked along the roadway

also interfere with routine road maintenance. Any vehicle posing a threat to safety is subject to immediate towing at the owner's expense.

Limiting guides to weekday operations would not significantly improve these parking situations as weather is more of a factor than scheduled time off. On a nice day there will be extensive use regardless of the day of the week, especially in the evening during the traditional work week. We therefore recommend the following trails receive consideration for expanded trailhead parking facilities in future planning efforts.

Estuary: Users park at the Old Sitka parking lot and boat launch access, and seems to be operating at capacity.

Mosquito Cove: Currently operating above capacity.

Thimbleberry/Hart Lake: Currently operating above capacity. Conflicts can be expected when 12 or more vehicles utilize the area.

### **Brown Bears and Bear/Human Safety**

We appreciate the EA's thorough discussion pertaining to brown bears as well as the District's efforts to work with the State on many aspects of brown bear/human interaction and trash control to prevent habituation.

The EA references a pending residential housing development along Benchlands Road. Based on current use of the road by bears to avoid residential areas along Halibut Point Road and traverse the area between Granite Creek and Cascade Creek, it is probable that bear traffic will shift to Cross Trail as development occurs. As this happens, bear/human encounters on the trail could increase, at least in the short term, which may require education efforts for human users to develop proper behavior when encountering bears. Encounters with bears have the potential to be hazardous and the potential for risk increases during late spring and early summer when encounters with sow bears and cubs are more likely. If desired, the State can provide the District with educational materials to distribute to outfitters, guides, and their clients.

The third paragraph on page 13 indicates a brown bear density of nearly 1.6 bears per square mile, which is unsupported by state data. Brown bear densities on Baranof Island are estimated to range from 1.0 to 1.2 bears per square mile, thus the 12 square mile area could be expected to have from 12 to 14 brown bears. We request the District clarify this in the final decision document and for use in future EAs. (See the "Southeast Alaska Unit 4 Brown Bear Management Strategy," published June 2000, at <http://www.wildlife.alaska.gov/index.cfm?adfg=pubs.mgt#bbear>) This comment also applies where similar information is provided in the second full paragraph on page 14.

### **Navigable Waters**

Page 4, Alternatives, 2<sup>nd</sup> bullet: Lakes large enough to facilitate float plane landings are, in all likelihood, navigable and therefore state-owned and managed. While the EA does

not disclose why float plane landings are problematic, should the District receive a request for that use, we request the State be included in the decision process.

**Additional Clarifications**

As noted above, the EA does not always explain the basis for limitations in the proposed action. While it would have been useful to include the following information in the EA for public review, at a minimum we request the following clarifications be included in the final decision document for future reference.

Page 4, Alternative 2, first paragraph: We request clarification of the standards used to delineate “*sensitive*” trails.

Page 5, Table 1: The EA states that “*up to 25 percent of the total capacity of each trail would potentially be authorized for guided use on some trails and [12.5 percent] of total capacity on more sensitive trails.*” We request clarification on why the full percent of capacity for commercial use is not being utilized at the Beaver Lake Trail.

Page 5, Alternative 2, first full paragraph: We request clarification on the process for identifying service days per season and group size.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan E. Magee  
ANILCA project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator