



June 24, 2017

Ben Bobowski, Superintendent  
Wrangell-St. Elias National Park and Preserve  
P.O. Box 439  
Copper Center, AK 99573-0439

Dear Mr. Bobowski:

The State of Alaska reviewed the Copper Lake Trail Improvements and Private Land Bypass Re-route Environmental Assessment (EA). The following comments represent the consolidated views of state resource agencies.

The State supports the Service's intent to re-route the Copper Lake Trail to avoid private property and establish a sustainable trail that maintains access for subsistence users while protecting park resources. Subsistence access is protected under the Alaska National Interest Lands Conservation Act (ANILCA). The Nabesna Off-Road Vehicle Management Plan affirmed that off-road vehicles are a method of surface transportation traditionally employed by rural residents for subsistence use pursuant to ANILCA Section 811(b). The plan identifies the types of vehicles that will be permitted on the Copper Lake Trail and other trails in the planning area.<sup>1</sup>

Rural residents have traditionally accessed Copper Lake via the existing Copper Lake Trail where it crosses private property. Copper Lake provides fishing opportunities for lake trout, burbot, and Kokanee. The proposed trail re-route will result in a loss of access to Copper Lake, which was not addressed in the EA. We request the Service address this issue in the EA and consider adding a spur route, which would maintain access to the lake, discourage continued trespass over private lands, and protect park resources from new user-created trails.

The EA indicates that a bridge will be constructed across Copper Creek, which is an anadromous stream. A Fish Habitat Permit from the Alaska Department of Fish and Game is required for any construction activities taking place below the ordinary high water line. The EA identifies bridge length but not width. We request the Service ensure that the bridge is wide enough to accommodate vehicles used by subsistence users. If the bridge is too narrow, users may either continue to use the old trail, crossing private property, or create new side trails and stream crossings, potentially impacting fish and riparian

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<sup>1</sup> The following types of vehicles, because of their size, width, weight, or high exertion of pounds per square inch will not be permitted for subsistence use: a) Nodwells or other tracked rigs greater than 5.5 feet in width or 4,000 pounds curb weight; b) custom 4x4 jeeps, SUVs, or trucks designed for off-road use; c) original or modified "deuce and a half" cargo trucks; d) dozers, skid-steer loaders, excavators, or other construction equipment; e) motorcycles or dirt bikes; and f) log skidders. Wheeled vehicles (including all terrain vehicles, utility vehicles, and Argos) must be less than 1,500 pounds curb weight, not including trailers. (Record of Decision, page 3)

habitat. We also request bridge width be similarly considered for any additional improvements along the trail.

The EA states that private land owners would be encouraged to use the improved trail. To protect fish and riparian habitat, we recommend that the width of the bridge also accommodate vehicles commonly used by private land owners.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, prominent "M".

Susan Magee  
ANILCA Program Coordinator