

Upper Stehekin Valley Road Environmental Assessment: Summary of Public Comments and Responses

AL3001. Alternatives: Environmentally Preferred Alternative should be Alternative D not B

Concern Statement: One comment stated that Environmentally Preferred Alternative should be Alternative D not B given the 1988 General Management Plan for North Cascades Complex and the stated policy of maintaining the 23-mile Stehekin Valley road to Cottonwood.

Representative Quote:

- “If you approach this issue with the intent of abiding by the Management Plan, then Alternative D has the least environmental impact. The choice you have made appears to be one of administrative and budget convenience rather than honoring the Park Plan and environmental choices.”

Response: The President’s Council on Environmental Quality states that the Environmentally Preferred Alternative is the alternative that causes the least damage to the biological and physical environment. It is also the alternative which best protects, preserves and enhances historic, cultural and natural resources. As described on pp. 56 and 57 of the Environmental Assessment and in the attached Finding of No Significant Impact, Alternative B is the environmentally preferred alternative because it will clearly cause the least damage to the biological and physical environment when compared to the other alternatives.

AL3102. Alternative A (No Action)—Oppose

Concern Statement: Nine comments stated that Alternative A is not the valid “No Action” alternative. Instead, the true “No Action” alternative should be to adhere to the policy of maintaining the road as articulated in the 1988 General Management Plan.

Representative Quote:

- “The true “no action” alternative is to leave the Park Management Plan unchanged, and fulfill the duty contained in that plan to maintain and preserve the road.”

Response: The President’s Council on Environmental Quality (CEQ) in its Forty Most Asked Questions Concerning National Environmental Policy Act Regulations (Question #3; see <http://www.nepa.gov/nepa/regs/40/40p3.htm>) provides explicit guidance on this point. CEQ has two distinct interpretations of “no action” alternatives: (1) “No Action” in the context of general management planning proposals; and (2) “No Action” in the context of specific project proposals. This EA clearly falls under CEQ’s second interpretation of the “No Action” alternative because it involves a federal decision on a specific project proposal as opposed to proposed changes to a general planning document such as a General Management Plan. In this case, “No Action” means exactly what is stated in the Environmental Assessment’s “No Action” Alternative: “The NPS would respond to future needs and conditions without major actions or changes in the present course.”

AL3200. Alternative B (Preferred Alternative)—Support

Concern Statement: Thirty three comments expressed support for Alternative B (Permanently Close the Stehekin Valley Road Above Car Wash Falls) for various reasons including, but not limited to, preserving the Stephen Mather Wilderness and minimizing adverse ecological impacts. Several of the comments also supported road closure because it would not substantially impact recreational access for most visitors, and/or the environmental benefits of road closure would be substantially greater than adverse impacts to visitor use.

Representative Quote(s):

- “...I see this most importantly as an issue about wilderness, about our society’s willingness to continue to honor the ideas embodied in the 1964 [Wilderness] Act, all of which come back to our willingness, at least in this place called “wilderness”, to restrain our urge to alter nature, to build and to mechanize. What a shame it would be (and how long remembered) if a precedent-setting boundary

change to build a road took place in the Stephen Mather Wilderness. I hope to never see it. I appreciate the wisdom as well as the common sense in the National Park service's stated preference for Alternative B. Please let it stand."

- "Closing the road would not inhibit access because it is very pleasant and easy walking for any healthy man, woman or child anywhere in the valley. As an example, in 2004 and again in 2005 my children hiked with me from the Landing to Bridge Creek and back during three days of our spring break. In 2000 we hiked from Bridge Creek to Cottonwood and back, including a side trip to the end of the Flat Creek Trail, over a period of several days. My daughter was three years old. These trips were challenging but not overly difficult for them. I have leisurely and comfortably walked from the landing to Cottonwood in less than two days though I am not exceptional in any way. To say that removing the road beyond Carwash Falls cuts off part of the valley to park visitors is simply not true."

Response: Thank you for your comments.

AL3202. Alternative B (Preferred Alternative)—Visitors with limited time and/or physical abilities opposed to closure.

Concern Statement: Twenty comments expressed opposition to road closure because families with children, elderly, handicapped people or visitors with limited time will no longer be able to access the Upper Stehekin Valley without the upper road.

Representative Quote(s):

- "My wife was born in the Lake Chelan Valley and spent most of her "growing-up" summers in the Stehekin Valley. Today while we reside in San Diego, California region, we visit Stehekin each summer to expose our children, and soon to be grandchildren, to its natural beauty. We have been patiently waiting for the repairs to be made to the upper road so that we can again travel to the Cottonwood Camp area. I am a quadriplegic and am confined to a wheelchair. I wish to express to the Park Service my concern with the apparent attitude that citizens in my condition should not have our access preserved. Without the use of a vehicle, I have NO ACCESS to the upper valley area. For years that area was available and it is now only accessible to hikers; this seems highly discriminatory to me."
- "The loss of this road changes reasonable day trips into multi-day treks. It adds one to two days of travel to any time spent in the Upper Valley and effectively closes the area to all but the most fit or those with easy access from the west side, thus making this amazingly beautiful area into a playground for an elite few."

Response: Thank you for your comments.

AL3300. Alternative C--Support

Concern Statement: Fifteen comments supported Alternative C primarily for reasons involving a perceived compromise between providing motorized access while keeping the upper end of the damaged road as trail.

Representative Quote(s): "I conclude option C. seems to be the most logical to me, thus restoring the road to a certain point to "Glory" from "Car Wash Falls" but leaving the road beyond to Cottonwood Camp accessible only by trail. This provides the many users access as well as recreation in the area, and retains the furthest most upper road section free from vehicle travel. A compromise I think, but a viable solution that meets the needs of the public and the environment."

Response: Thank you for your comments.

AL3302. Alternative C--Oppose

Concern Statement: Twenty one comments opposed Alternative C for various reasons including, but not limited to: (a) the high financial costs of rebuilding the road; (b) the adverse ecological impacts of road construction and maintenance; and (c) the limited number of people who would drive on the road.

Representative Quote(s):

- “Alternative C is an irresponsible choice both physically and financially. Physically, 70,000 cubic yards of riprap for a “temporary fix is a waste of natural resources. Financially \$6,600,000 is a GROSS waste of the American people’s hard earned money.
- “to bulldoze a new [road] through the area would be a mistake. It would be extremely expensive, of course, and the “ecological” price would be prohibitively high. It also could wash out, sooner or later. All roads require constant maintenance, lots of gravel, etc. especially in Stehekin. This is a waste in my eyes, considering how very few people actually use it, and how many good hiking and sight-seeing alternatives there are in the valley.”

Response: Thank you for your comments.

AL3400. Alternative D—Support

Concern Statement: Thirty seven comments supported Alternative D for various reasons including protecting the natural processes of the Stehekin River and striking a balance between wilderness preservation and recreational access.

Representative Quote(s):

- “If we assume (and I do) that vehicular traffic to Cottonwood, or even Glory, is a good thing then a re-route would be more beneficial to the spirit of the wilderness than either the past practices or reconstruction of the old road. A re-route would leave the river to its natural geological development while allowing a greater portion of the riparian habitat to be undisturbed. Moving the road up the hillside would accomplish this while still allowing access to the river.”

Response: Thank you for your comments.

AL3402. Alternative D--Oppose

Concern Statement: Nine comments opposed Alternative D for various reasons including, but not limited to cost, adverse ecological impacts, conflict with existing laws and policies, the adverse impacts to wilderness and the precedent that would be set should Congress amend the Washington Parks Wilderness Act of 1988 to allow road relocation. Several other comments indicated support for Alternative D out of the four alternatives presented in the EA, but these comments believed that a new alternative needed to be considered (see AL4000).

Representative Quote(s):

- “We are concerned that implementation of Alternative D would negatively affect the health of tributaries, fisheries and aquatic habitat. As noted in the EA, “major, long-term adverse impacts on the lower reaches of the Stehekin river tributaries and their associated floodplains, riparian wetlands, and old-growth cedar wetland.” Sedimentation, channel alteration, turbidity, scour and filling and loss of floodplain function will all result from the road reconstruction proposed in Alternative D. Additionally, road reconstruction would impair the wilderness character of the proposed area and have a negative impact on wildlife as a result of road-related incidents including wildlife mortality and avoidance of the area.”

Response: Thank you for your comments.

AL4500. Alternatives: New Alternatives or Elements. Rebuild the road within the non-wilderness corridor but outside/above the floodplain and at much less cost than Alternative C.

Concern Statement: One hundred seventy eight comments rejected the four alternatives presented in the EA and recommended the NPS consider an additional, much less costly alternative “E” that would (a) rebuild the road within the existing non-wilderness corridor; (b) avoid critical washouts and unstable areas; (c) blast through cliffs and bedrock outcrops to raise the road above the floodplain; and (d) use the fill materials generated from blasting as opposed to importing the fill from outside of the valley.

Representative Quote(s):

- “I believe with local contractors we can re-establish the road with minimal impact and cost and keep

the integrity of the wilderness corridor. I'd like to request a new EA that focuses on this much needed option".

- "We consider the EA limited and divisive. We ask for a new EA and suggest an Alternative "E" which is based on permission granted through the General Management Plan of this area to keep the road open to Cottonwood Camp, through reasonable economic means and methods, and through corridors that are legally sound within the non-wilderness corridor."

Response: The NPS agrees that it may be possible to reconstruct sections of the road out of the floodplain while remaining within the non-wilderness corridor. This could be done by blasting into bedrock and cliff bands as opposed to importing extensive amounts of fill and rebuilding the road exactly within its former location. This engineering approach, however, would cause a variety of potentially significant environmental impacts. In addition, it would not comply with the provisions of the Sand Rock and Gravel Plan, a component of the 1995 General Management Plan (GMP) for Lake Chelan NRA. The GMP evaluated the potential need for large quantities of fill materials for road maintenance purposes, and established a policy of allowing limited quantities of sand, rock, and gravel to be mined in the valley solely at the Company Creek Pit. No new borrow sites are allowed. The superintendent does have the authority to exceed limits on rock mining in the event of a major emergency such as a major flood, but this action is not an emergency. The primary problem with this proposed "Alternative E", however, is not the GMP restrictions on use of rock and borrow sites in the valley. Instead, the active landslide at mile post 15, just upstream of Shady Campground renders this proposal infeasible.

The park geologist in June 2006 thoroughly evaluated the current condition and stability of the landslide to determine whether the road could be reconstructed. Since spring 1995, the head of the landslide has continued to move upslope toward the Stephen Mather Wilderness boundary. Although the rate of lateral movement appears to have slowed, the distance to the Stephen Mather Wilderness boundary from the head-scarp (i.e. highest point) of the slide is now within 20 ft at its closest point. The slide has grown laterally and claimed approximately 200 ft of the former road, compared to only minor road shoulder loss immediately after the flood. The vicinity of the landslide will remain unstable for the foreseeable future due to several factors and forces including: (a) the unstable influence of a series of springs within the slide; (b) the granular, unconsolidated composition of the geologic material (glacial deposits) in the slide; (c) the highly unstable, 50 foot vertical head scarp above the springs, and the angle of attack of the river on the toe of the slope. Given these conditions, it was determined that the land mass at the head of the slide could fail without notice. Therefore, the NPS believes it would neither be safe or feasible to reconstruct the road either through or around the head of the landslide and still remain within the non-wilderness corridor.

In summary, given (1) the limits on rock use in the valley including the prohibition on establishing new borrow pits, and (2) the insurmountable barrier of landslide, the proposed "Alternative E" is not feasible.

AL4010. Alternatives: New Alternatives or Elements. Allow bicycle use on former road.

Concern Statement: Three comments stated the NPS should engineer a trail and bridge network to accommodate bicycle use within the non-wilderness corridor of the former road.

Representative Quote(s):

- "Because bicycles will allow many people quiet, non-polluting access to upper road destinations and trailheads let's put our creative minds together to solve the difficulties of bicycling over the washouts at Carwash Falls and the slump at Shady Camp...At Carwash, suspension bridges could be built to span the difficult scrambles there. At the Shady slump a suspension bridge could be eventually built. Until the slump stabilizes itself, a cable loop could be installed to span the slump. It could be suspended on pulleys between posts. Cyclists would attach their bicycle to the lower cable then pull

the upper cable to move their bicycle across the slump. Think of the pulley systems holding clotheslines between separate tenement buildings. Cyclists would walk around the slump to retrieve their bike.”

Response: The EA considered but dismissed an alternative that would allow bicycle use on the former road because there would be no safe way to build a trail around the landslide and remain within the non-wilderness corridor. This proposal offers a potential means of getting past the slide and around the cliff bands downstream of the slide (e.g. Carwash Falls) while remaining in the non-wilderness corridor using an innovative engineering approach including bridges and cables. The NPS has considered but rejected this expensive proposal due to lack of funding, safety concerns and general uncertainty as to whether the proposal would truly be feasible given the terrain constraints.

AL4020. Alternatives: New Alternatives or Elements. Build a spur trail from the proposed parking area below Carwash Falls to the PCT.

Concern Statement: One comment recommended the NPS build a spur trail directly from the proposed parking area below Carwash Falls to the Pacific Crest Trail (PCT). This spur trail is needed because the lack of direct access to the PCT from the parking area would encourage visitors to park directly at the intersection of the Stehekin Valley road (MP12.7) and the current spur trail to the PCT as opposed to the Carwash Falls parking area (MP12.9).

Representative Quote(s):

- “If there is no trail between Carwash and Shady, the parking area at the Carwash turnaround will be un-used or underused unless there is a spur trail directly from the parking area to the PCT.”

Response: The NPS has considered but rejected this proposal because the parking area at Carwash Falls is a logical terminus for the road given the close proximity to the river and previous disturbance to the site. In addition, the junction to the current PCT spur trail is a very short walk (0.2 miles) so access to the PCT is readily available.

AL4030. New Alternatives or Elements. Build more day-use trails in the lower valley.

Concern Statement: One comment stated if the NPS closes the upper road, then more day-use trails should be built in the lower valley to mitigate the loss of day-use opportunities.

Representative Quote(s):

- “I would like to see the park develop a more extensive day-use trail system in the Lower Stehekin valley. In particular, this should be part of any plan that involves closure of the upper valley road (i.e. to help offset loss of upper valley day-use options).”

Response: The NPS supports this proposal. The Transportation Plan component of the Lake Chelan GMP includes an 11-mile pedestrian and horseback trail from the Stehekin Landing to High Bridge. Several other smaller trails in the lower valley are also proposed. With all major flood-related damages resolved, the NPS will now have the personnel time and resources necessary to pursue development of these proposed trails.

AL4040. New Alternatives or Elements. Rebuild the road in wilderness only where absolutely necessary.

Concern Statement: One comment suggested reestablishing the road to Cottonwood by linking sections of the road that did not wash out with new sections of road constructed in wilderness only where absolutely necessary to avoid future washouts.

Representative Quote:

- “Another alternative to consider would be trading some wilderness, where absolutely necessary, with the land next to the river so the road could be moved away from the river. It does not have to be done in its entirety—only where it makes fiscal sense. Let’s not spend our tax dollars on rebuilding exactly where it will wash out again. Let’s not spend our tax dollars completely rebuilding the road away from the river in places where it does not have a history of washing out. Instead, please consider

moving the road where necessary, keeping it where it is when possible, and maintaining the original intent of Congress to allow vehicle access to Cottonwood Camp.

Response: The merits of this proposal were largely captured in Alternative D. Alternative D proposed to relocate the road in what is currently designated wilderness along the former wagon trail (now PCT) from Mile Post (MP) 12.7 to MP 15.3. From MP 15.3 to MP 20.3, the road was largely undamaged so Alternative D proposed to repair the road as opposed to relocating it in the Stephen Mather Wilderness. The final section of former road from MP 20.3 to MP 20.8 was destroyed in the 1995 flood, so Alternative D proposed to relocate that section of road away from the floodplain and into the Stephen Mather Wilderness. Finally, as with Alternative D, this proposed new alternative would require legislation to amend the Stephen Mather Wilderness boundary, because the NPS does not have the authority to “trade” wilderness.

AL4050. New Alternatives or Elements. Rebuild the road in order to provide access for visitors and valley residents with disabilities.

Concern Statement: Three comments stated the road should be rebuilt in order to provide access for those with disabilities. Some of these comments stated that road closure would violate the Americans with Disabilities Act.

Representative Quote:

- “I also believe critical protections under the Americans with Disabilities Act are violated in the NPS’s denying access that was previously provided to differently-abled visitors in this area.”

Response: The NPS sincerely empathizes with disabled visitors. However, in this case the only feasible action the NPS can take, within its designated authorities, is to implement Alternative B and close the road at Car Wash Falls. The legal requirements of the Americans with Disabilities Act are discussed in response to concern statement *PN11030* on page ???.

AL4060. New Alternatives or Elements. Amend the GMP so no longer responsible for road maintenance.

Concern Statement: One comment stated if the NPS closes the road, then the NPS should amend the GMP so it is no longer responsible for road maintenance.

Representative Quote:

- “...the National Park Service should make plans to either repair the road to Cottonwood OR submit a new General Management Plan Proposal which would remove the National Park from the responsibilities of maintenance and preservation of the road.”

Response: The 1995 General Management Plan for Lake Chelan NRA does state that the NPS will provide a road from the Landing to Cottonwood. However, the GMP envisioned the inevitable conflict between maintaining the road and preserving the scenic character and natural processes of the Stehekin River. The GMP balances these conflicting objectives by establishing the following criteria for protecting the public road system, including the Stehekin Valley Road, from flooding as follows:

“...Existing public roads [e.g. the Stehekin Valley Road] would be protected in erosion/river conflict zones only if (1) there are no feasible alternatives, (2) funds are available, (3) proposed actions would have lesser impacts than other alternatives, and (4) the proposed actions are permitted by the county, state and other federal agencies.”

Alternative C (road reconstruction) does not satisfy criterion one because Alternative D is feasible and could be implemented should Congress (a) amend the Stephen Mather Wilderness boundary to relocate the road, and (b) provide funding for road relocation. Alternative C does not satisfy criterion two because the costs would greatly exceed the available funding. Alternative C does not satisfy criterion three because road reconstruction would have substantially greater impacts to the Stehekin River and its floodplain when compared to the other alternatives. Alternative D is feasible (criterion 1), but the NPS does not currently have the funding to relocate the road (criterion 2), nor does it have the authority to move the Stephen Mather

Wilderness Boundary. In light of these circumstances, the NPS asserts that road closure as proposed in Alternative B is entirely consistent with the 1995 GMP. The GMP does not need to be amended to implement this action. The NPS agrees, however, that the next revision of the GMP for Lake Chelan NRA will need to clarify the road closure, and may need to recommend additional management actions should currently unforeseen needs arise in the future.

New Alternatives or Elements. Provide independent, qualified cost estimates for Alternatives C and D.

Concern Statement: Two comments explicitly questioned the high costs of Alternatives C and D and requested the NPS provide new cost estimates from independent, qualified professionals.

Representative Quote:

- “Provide independent and competitive cost estimates from qualified road construction engineers and contractors. I believe the high cost of Alternate C and D road construction could be reduced significantly if the planning, estimating and project management were performed by professional contractors rather than the National Park Service.”

Response: The NPS obtained qualified, independent cost estimates for road reconstruction (Alternative C) from engineers with the U.S. Department of Transportation, Federal Highway Administration. For road relocation (Alternative D), the NPS obtained independent and qualified cost estimates from engineers with the U.S. Department of Agriculture, National Forest Service. In both cases, the cost estimates were calculated to an accuracy referred to as Class “C”. Class “C” estimates are primarily used for long-range planning and compliance purposes (such as this decision). The estimates may appear to be high because they are adjusted for undefined expenses that will typically be quantified by the time the project is fully designed and ready for contract solicitation.

AL4080. New Alternatives or Elements. Implement Alternative D in stages to reduce cost.

Concern Statement: Two comments suggested the NPS implement Alternative D in stages given limited funding and the lengthy timeframe for legislative action that would be needed to amend the Stephen Mather Wilderness boundary and rebuild the road.

Representative Quote:

- “I realize that all of option D will take time and cost many dollars. However, it can be done in stages, perhaps opening to at least Bridge Creek or hopefully Glory as stage one.”

Response: The NPS does not have the funding to implement Alternative D in stages, nor the authority to relocate the road without a legislative amendment to the Stephen Mather Wilderness boundary.

AL4090. New Alternatives or Elements. Modify Alternative D to include trail along river.

Concern Statement: One comment suggested modifying Alternative D to also include a trail along the river.

Representative Quote:

- “Perhaps a walking trail could be improved along the river so the view, camping and fishing access would be improved especially for the young and elderly.”

Response: The NPS does not have the funding to build a trail along the river given the extensive engineering that would need to be done to prevent future flood damage and provide safe passage around cliff bands and related barriers to trail construction.

AL4100. New Alternatives or Elements. Modify Alternative B to include more parking at Carwash Falls.

Concern Statement: One comment suggested increasing the parking capacity at Carwash Falls or vicinity from six to twelve vehicles given the perceived high demand for parking.

Representative Quote:

- “...the number of parking spaces provided for in option B seems insufficient. With the number of residents, tourists and private vehicles in the valley, I would suggest creating more parking, or additional parking nearby for perhaps up to a dozen vehicles.

Response: The six-vehicle parking capacity was adequate following the 1995 flood that temporarily closed the road at Car Wash Falls. In addition, the close proximity of the wilderness boundary constrains the capacity of parking. In the near term, the NPS intends to stick with the original proposal of 6-vehicle parking capacity. If more capacity appears to be needed in the future, the NPS will evaluate the need at that time.

AL4110. New Alternatives or Elements. Modify Alternative C for only LEV and low noise vehicles.

Concern Statement: One comment suggested Alternative C should be modified to limit use of the road to low noise vehicles and low emission vehicles (LEV's).

Representative Quote:

- “Support Alternative C. But road should only be open to low noise and low emission vehicles.”

Response: Thank you for your comments.

AL4120. New Alternatives or Elements. Develop cooperative agreement with local non-profit to maintain road.

Concern Statement: One comment recommended establishing an agreement with a local non-profit to assist or take over road maintenance on a voluntary basis and thus reduce costs.

Representative Quote:

- “Sign an agreement with a local non-profit group such as the Stehekin Heritage Society. They might possibly take over maintenance of the road and you could have them sign liability waivers releasing the County or NPS of liability for any injuries incurred while they maintain the road at their own expense, using volunteer labor. This similar agreement has been in use and has worked great at Monte Cristo.”

Response: Thank you for your comment.

AL4130. New Alternatives or Elements. Modify Alternative C to terminate road at Shady

Concern Statement: One comment suggested rebuilding the road to Shady Campground (MP 14.6) if funding is limited and/or Congress does not amend the Washington Parks Wilderness Act of 1988.

Representative Quote:

“Shady camp area has plenty of room for a road terminus and if I had to wait for more money or engineering or even an Act of Congress this would be far superior to closing it at Carwash. Getting a road even to Shady would get the road open to within spittin’ distance of Bridge Creek and then a trail from there would at least be possible.”

Response: This proposed modification would still have substantial cost and impact in order to rebuild the road from Car Wash Falls to Shady Camp. The NPS believes the substantial fiscal and environmental costs of this proposal would not justify the benefits of foreshortening trail access to Bridge Creek Camp by approximately two miles (i.e. 1.3 miles to Bridge Creek from Shady Camp vs. 3.2 trail miles from Car Wash Falls to Bridge Creek).

AL4140. New Alternatives or Elements. Modify Alt. C to include only shuttle, foot and horse access

Concern Statement: One comment suggested Alternative C should be modified to limit use of the road from Bridge Creek to Cottonwood Camp to only allow public shuttles and non-motorized transportation.

Representative Quote:

- “I agree that only shuttles, horses, bicycles and hikers should be allowed between Bridge Creek and Cottonwood Camp. I disagree with allowing other motorized vehicles on a reconstructed road such as mentioned in Alternative C. I would support Alternative C if other motorized vehicles would not be allowed on the reconstructed road.”

Response: Thank you for your comments.

AL4150. New Alternatives or Elements. Modify Alternative B to provide shuttle service to Stehekin for PCT hikers

Concern Statement: One comment stated it is very important to provide Stehekin shuttle access to PCT

hikers, and Alternative B does not allow access to Stehekin for the majority of through hikers (who are heading north). The NPS needs to provide shuttle service to Stehekin for PCT hikers.

Representative Quote:

I would be supportive of Alternative B except it is important to provide access to Stehekin for Northbound and Southbound PCT through hikers. Preferred alternative B does not allow access to Stehekin for the majority of through hikers, who are heading north. Please consider adding access for north and southbound hikers to the shuttle to Stehekin.”

Response: As stated in the Environmental Assessment, the shuttle bus operation as described for Alternative B (preferred alternative) would continue to provide PCT hikers (and all other visitors) with transportation from (a) the PCT/Stehekin Valley Road intersection at High Bridge (MP 11.2), and (b) Car Wash Falls MP 12.9; road end) to Stehekin. Hikers headed south on the PCT will no longer have shuttle access at Bridge Creek, as was the case before the flooding. Those hikers will have to travel approximately 3.2 additional miles southward on the PCT from Bridge Creek Camp to reach the nearest shuttle at Car Wash Falls.

CC1000. Consultation and Coordination: General comments from the U.S. Fish and Wildlife Service

Concern Statement: The U.S. Fish and Wildlife Service supports Alternative B (road closure).

Representative Quote(s):

- “The USFWS enthusiastically supports NOCA’s preferred alternative. We believe closing the road at Carwash is the best option for protecting fish and wildlife resources, maintaining reasonable visitor access, and spending public funds wisely. In addition to avoiding deleterious construction impacts, this option will allow river processes to occur naturally in the future, as there will be no streamside road that might prompt river control efforts. Consequently aquatic habitat and riparian conditions will develop without interference.

Response: Thank you for your comments.

CR4001. Cultural Resources: Impact of Proposal and Alternatives. Road has significant historic value.

Concern Statement: One comment asserted the Stehekin Valley road has significant historic and interpretive value that should be protected by being kept open and its history interpreted.

Representative Quote(s):

- “[the road] has significant historic interest and value. Open to Bridge Creek since 1899, and to Horseshoe Basin since 1940, it showcases the historic mining activity that gave impetus to settling this area. Thus it is a fine interpretive asset.”

Response: NPS studies by Thompson (1970) and Luxenberg (1986) have concluded that the travel corridor between Lake Chelan and Cascade Pass is historically significant in the context of the National Historic Preservation Act. This conclusion, however, focuses on the significance of the travel *corridor*, as opposed to the Upper Stehekin Valley Road itself, because it is likely that the “original” wagon road and all its successors were re-routed as necessary in response to floods, landslides, avalanches, convenience, et cetera. The NPS has yet to determine fully what elements of the existing roadbed are historic because it is not clear how long it has existed, without modification, in its current alignment. However, it is known that the current section of road between Car Wash Falls and Bridge Creek uses little, if any, of the older wagon road. Up-valley of Bridge Creek, the extent to which the current road uses any of the old wagon trail is unclear, thus it is uncertain at this time whether the existing roadbed has historic “integrity”—an important criterion for eligibility to the National Historic Register. Sections of the existing Upper Valley Road might found to be historic as a Mine to Market road (dating to the truck road for Black Warrior Mine from 1947), provided they retain their historic integrity (e.g. original features).

The NPS is currently seeking funding for a detailed study to make the formal determination of historical significance under the terms of the National Historic Preservation Act. The NPS agrees that the travel

corridor is a fine interpretive asset, and the knowledge gained from finalizing the evaluation of its historic significance will be used for interpretive purposes. Until the road can be formally evaluated and determined to be eligible or ineligible for listing under the Act, the NPS must manage the road as if it is historic. The management actions that will be implemented under this decision include removing non-historic elements including culverts and a concrete pad at Car Wash Falls. The NPS will take no actions that would reduce the historic significance of the roadbed itself.

References:

Luxenberg, Gretchen. 1986. Historic Resource Study for North Cascades National Park Service Complex. U.S. G.P.O. Publ. 1986; 695-684: Cultural Resources Division, Recreation Resources and Professional Services, Pacific West Region. 385 pp.

Thompson, Erwin N. March 1970. North Cascades N.P., Ross Lake N.R.A. & Lake Chelan N.R.A. History Basic Data. U.S. Department of the Interior, National Park Service Eastern Service Center, Office of History and Historic Architecture. 301 pp.

ED1010. General Editorial: EA is biased in favor of road closure

Concern Statement: Twelve comments asserted that the EA was written in an arbitrary and capricious fashion in favor of road closure for various reasons including, but not limited to, use of erroneous information and a range of alternatives that excludes reasonable alternatives.

Representative Quote(s):

- “The public has been called upon to comment on an EA that is misleading, and has summarily discarded or not considered other viable options. To move forward at this point would be to rely upon a document that is promulgated upon erroneous information and which has adopted a preferred alternative developed from the same.”
- “An EA that assesses only extreme and opposite alternatives cannot provide a sound basis for good policymaking decisions. The park cannot afford the loss of credibility and trust engendered by an EA which appears to artificially setup a forced decision between extreme choices without considering middle ground alternatives. Thank you for considering these views.”

Response: This Public Comment and Response Report provides various justifications as to why seemingly “reasonable” alternatives were dismissed or otherwise not considered. In particular, various public comments recommended the NPS consider sixteen new alternatives or modifications to the existing alternatives.

Responses to these comments are provided in the response to comments AL4000 through AL4150.

PN11010. Purpose and Need: Laws, Policies and Mandates. NPS has duty to maintain Upper Stehekin Valley Road.

Concern Statement: Forty comments variously stated the NPS has a duty to maintain the 23-mile Stehekin Valley road as intended by Congress and as stated in the 1988 General Management Plan for North Cascades National Park Service Complex.

Representative Quote(s):

- “It is apparent the National Park either does not understand that it is responsible for the maintenance and preservation of the road as described in the North cascades National Park Bill of Oct. 1968 and the General Management Plan adopted by the park in 1988 OR the National Park Service is trying to put up a smoke screen so the National Park Service does not have to maintain as much responsibilities and cost of the road.”
- I believe the EA is incomplete since it fails to address the legal basis of the road, the associated public rights to use the road, and the responsibility of the NPS to maintain the road under PL90-544. If these rights and responsibilities were fully recognized and fairly evaluated in the EA, restoring the road all the way to Cottonwood might be justified. However, if the NPS proposes to forever close the road and

attempts to erase the right-of-way beyond Carwash Falls (Ref: Alt B), there might be sufficient legal basis to return responsibility for management and maintenance along the route to Chelan County and/or the State of Washington.”

Response: Chelan County in 1970 transferred its interest in a portion of the Stehekin Valley Road by quitclaim deed to the United States, and vacated its interest in the remaining portion of the Stehekin Valley Road. In United States V. Chelan County, CS-92-0331-AAM (USDC E.D. Wash.), decided June 4, 1993, Chelan County was permanently enjoined from asserting a claim of title to the Stehekin Valley Road, and transfer of the road from the County to the United States was reaffirmed. In light of this history, the NPS firmly considers its ownership of the Upper Stehekin Valley Road and its right-of-way a matter of settled law.

The Washington Park Wilderness Act of 1988 (Public Law 100-668) established the Stephen Mather Wilderness boundary as being 50-feet on either side of the centerline of the location of the Upper Stehekin Valley Road—as it existed at the time of the bill’s passage. The Act did not include any additional provisions about maintaining the road in the event of a severe flood. Therefore, the NPS believes there is nothing in the law that would indicate Congress intended for the NPS to maintain the upper road when confronted with substantial damages requiring very costly if not infeasible repairs and numerous adverse environmental impacts.

The 1988 General Management Plan for North Cascades National Park Service Complex states: “The Stehekin Valley Road will be maintained at its current length, width and character.” It is very important to note, however, that the 1995 General Management Plan for Lake Chelan National Recreation Area supersedes the 1988 Complex-wide GMP regarding management of the Stehekin River and maintenance of the Stehekin Valley Road, including the upper portion of the Stehekin Valley Road within North Cascades National Park that is the subject of this decision.

As stated in response to Concern Statement AL4060, the 1995 GMP for Lake Chelan NRA addressed the inevitable conflict between maintaining the road and preserving the scenic character and natural processes of the Stehekin River. The GMP strives to reconcile this conflict by establishing the following management criteria for protecting the public road system, including the Stehekin Valley Road, from the natural processes of the Stehekin River as follows: “...*Existing public roads [e.g. the Stehekin Valley Road] would be protected in erosion/river conflict zones only if (1) there are no feasible alternatives, (2) funds are available, (3) proposed actions would have lesser impacts than other alternatives, and (4) the proposed actions are permitted by the county, state and other federal agencies.*”

Alternative C (road reconstruction) does not satisfy criterion one because Alternative D is feasible and could be implemented should Congress amend the Stephen Mather Wilderness boundary to accommodate road relocation and provide money for road relocation. Alternative C does not satisfy criterion two because the costs would greatly exceed the available funding. Alternative C does not satisfy criterion three because road reconstruction would have substantially greater impacts to the Stehekin River and its floodplain when compared to the other alternatives. Alternative D is a feasible alternative for road relocation so it satisfies criterion one. However, the NPS does not currently have the funding to relocate the road, so it does not satisfy Criterion two. Alternative D would have much less impact to the Stehekin River and its floodplain when compared to Alternative C, so it does satisfy criterion three. Further consultation with various agencies would be needed to determine whether Alternative D satisfies criterion four. Given these circumstances, the NPS believes it has fully satisfied its “duty” to maintain the Stehekin Valley Road within the authorities of its

Enabling Legislation, the Washington Park’s Wilderness Act of 1988 and the 1995 GMP for Lake Chelan NRA.

PN11020. Park Operations: Guiding Policies, Regulations and Laws. NPS has duty to close road.

Concern Statement: Three comments explicitly stated rebuilding or relocating the road would violate a variety of federal laws and policies intended to protect park resources and to enhance the visitor experience.

Representative Quote(s):

- “In order to reconstruct or reroute the road the NPS would be violating its own management policies with respect to location of road systems, floodplain management, wetland protection, resource protection, and Soundscape preservation and noise management. The efforts to maintain or relocate the [road] would [also] result in degradation to the Wild and Scenic River characteristics...”
- “Alternative B – retiring the 10 miles of road between Carwash Falls and Cottonwood Camp—best meets the spirit and requirements of the Wild and Scenic Rivers Act, as well as the requirements of the National Park Service Organic Act, The Lake Chelan National Recreation Area General Management Plan (LACH GMP) and NPS Management Policies.”

Response: The NPS agrees. Please refer to the Finding of No Significant Impact for the justification.

PN11030. Purpose and Need: Laws, Policies and Mandates. NPS has duty to rebuild road in order to comply with the ADA.

Concern Statement: Two comments expressed concern with the Americans with Disabilities Act (see response to Concern Statement AL4050), however, one comment in particular challenged the NPS to evaluate the legal requirements of the Americans with Disabilities Act because road closure could violate that federal law.

Representative Quote(s):

- “Finally, time does not allow for consideration of other more complicated but related issues, such as whether NPS, in eliminating previously provided access to disabled persons, violates the ADA. I bring this matter to your attention solely because applicability of the ADA seems likely where existing access is removed, and ask you to review your responsibilities under that act with respect to each of the alternatives you ultimately choose to consider...”

Response: Section 507 (c) of the Americans with Disabilities Act is the only section that pertains to the executive branch of the federal government. That section reaffirms several key requirements of the Wilderness Act including: (1) allowing disabled individuals to use wheelchairs (or other human-powered mechanical devices) in federally-designated wilderness, and (2) not requiring agencies to provide any form of special treatment or accommodation, or to modify any conditions of lands within a wilderness area in order to facilitate such use. Instead of the ADA, the executive branch of government must follow the Rehabilitation Act of 1973, which prohibits discrimination in services and employment on the basis of a handicap. Federal regulations (43 CFR part 17, subpart E) clarify this law by stating that agencies are not required to take any actions or provide access that would (a) result in a fundamental alteration in the nature of a program or activity; or (b) cause undue financial and administrative burdens. Reconstruction of the Stehekin Valley Road would be very expensive and/or infeasible. Chapter 5 in the EA discusses the costs associated with implementing each of the alternatives, and Table 4 contains a comparison of the discussed costs. Please see response to comment AL4000 concerning feasibility of road reconstruction.

PN11040. Purpose and Need: Laws, Policies and Mandates. The National Trails System Act not described.

Concern Statement: One comment stated the “Relevant Laws, Policies and Management Plans” section of the EA failed to include a discussion of the National Trails System Act.

Representative Quote(s):

- “The initial run down of legislation with which the decision must comply lacks a reference to the

National Trails System Act, but the act is referenced in the analysis on a regular basis. If the EA is revised it would be good to correct this oversight.”

Response: The National Trails System Act, as amended (16 U.S.C. 1241–1251), established the Pacific Crest National Scenic Trail in 1968. National scenic trails are defined as extended trails so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. They are located so as to represent features which exhibit significant characteristics of the physiographic regions of the nation. Section 1246 (b) (i) states the Secretary of the Interior may relocate segments of a national scenic trail with the concurrence of the National Park Service Director, upon a determination that the relocation is necessary to preserve the purposes for which the trail was established.

PN11050. Purpose and Need: Laws, Policies and Mandates. Address whether Congress intended for a road in wilderness.

Concern Statement: One comment requested a specific analysis as to Congress’ intent regarding the Upper Stehekin Valley Road.

Representative Quote(s):

- “Clearly it was a very conscious decision to allow the road to Cottonwood to remain open when the Wilderness was created. Apart from road maintenance cost and feasibility, if there is a good reason to re-consider whether that area should be roadless and/or Wilderness, it should be addressed directly. (I’m not voicing an opinion here on whether the upper valley should be in wilderness; just that I would like to see it decided directly rather than having it result as a side effect from the road maintenance decision.)”

Response: The potential impacts of flooding on the road were well understood when the Washington Park Wilderness Act of 1988 (Public Law 100-668) established the Stephen Mather Wilderness boundary as being 50-feet on either side of the centerline of the location of the Upper Stehekin Valley Road as it existed at the time of the bill’s passage. The Act did not include any additional provisions about maintaining the road in the event of a severe flood. Therefore, the NPS believes there are no provisions in the law that would indicate Congress intended for the NPS to maintain the upper road when confronted with substantial damages requiring very costly if not infeasible repairs, lack of funding and numerous adverse environmental impacts.

PO4010. Park Operations: Impact of Proposal and Alternatives. Cumulative cost of road repair and maintenance not fully disclosed.

Concern Statement: One comment stated the NPS has spent considerable amounts of money and non-renewable park resources (e.g. gravel and rock) on road repairs and maintenance, including considerable money on repairs to the road below Car Wash Falls following the October 2003 flood. By conducting environmental impact analyses of repair actions on segments of the road, the present EA fails to disclose fully the true costs of maintaining the Stehekin Valley road and leads to an incomplete understanding of the cumulative costs of road repair and maintenance.

Representative Quote(s):

- “Recent floods closed the last approximately 3 miles of road in 1995 and the 2003 flood made the road impassable at a number of places above and below Carwash Falls. The NPS has reopened the road to the vicinity of Car Wash Falls at significant expense. It is now considering the environmental consequences of repairing or rerouting the road above that area. NCCC [North Cascades Conservation Council] points out that this segmented approach to either emergency repairs and repairs of the Stehekin Valley Road under an Environmental Assessment below Carwash Falls leads to an incomplete understanding of the true costs of maintaining the Stehekin Road.”

Response: In the aftermath of the October 2003 floods, the NPS prioritized its response to flood damage by repairing sections of the lower Stehekin Valley Road to restore vehicle access to private property and NPS

facilities. Two separate EA's were prepared and management actions implemented to restore vehicular access to the lower valley. A single, comprehensive EA following the flood damage was not undertaken given (1) the urgent need to restore access to private property and NPS facilities; (2) emergency funding limitations to project-specific actions; and (3) the need to perform detailed surveys of flood damage and gather estimates for road repairs from the Federal Highway Administration and the U.S.D.A. Forest Service. This EA is the last EA needed to address the 2003 flood damage.

The cumulative cost of road repairs and maintenance since the Park and NRA were established is not accurately known. Such an estimate would take considerable staff time to research and compile, and some important information may be missing given the lengthy timeframe. However, enough information is available to place the cumulative cost of road repair and maintenance between \$2-10 million. In 1995 alone, the NPS spent almost \$1 million repairing the flood damage on the Stehekin Valley Road.

PO4020. Park Operations: Impact of Proposal and Alternatives. NPS must accept responsibility and cost of road repair and maintenance.

Concern Statement: One comment stated that if the NPS rebuilds the road it will be damaged in the future but the NPS should expect to repair the damages as the cost of doing business.

Representative Quote(s): "There is more than one way to clean up the road and yes maybe it will continue to have problems, but this is the job you have been given."

Response: Thank you for your comment.

SE4010. Socioeconomics: Impact Of Proposal and Alternatives. Road closure will have an adverse socioeconomic impact on business.

Concern Statement: Five comments stated that if the road remains closed it will have an adverse economic impact on tourism-related businesses because visitation will decline.

Representative Quote(s):

- "The road closure has brought about a steady drop in visitation by people that in the past have used Stehekin as their way to this section of the park. This in turn creates an economic hardship on the people that rely on tourism as an important part of their income. I predict that this visitor decline will become much more dramatic thru the end of this decade and beyond if the upper valley road is not open to vehicles. As I write this, the cheapest ticket to Stehekin is \$39 which is very discouraging to people especially when the upper valley road is closed."

Response: Thank you for your comment.

SE4020. Socioeconomics: Impact Of Proposal and Alternatives. Road closure will have an adverse socioeconomic impact on Stehekin Valley residents.

Concern Statement: Two comments stated that road closure would have an adverse impact on Stehekin Valley residents by reducing their motorized access into the park.

Representative Quote(s):

- "The Stehekin Community has had ready access to Cottonwood Camp, and trails along the way, since at least 1940. Without the road, the feeling is one of being hemmed in, deprived and tightly constrained. People outside the Stehekin Valley would appreciate this better were they to ask themselves the question, "How would I feel if I lived in a place where I could only drive 9 miles of road, being blocked from going farther by Lake Chelan on one end and unrepaired road damage at the other? We wonder how many people, including members of the many fine conservation groups we belong to have ever considered this while they have virtually unconstrained privilege of using a myriad of roads to reach hiking and vacation places from their homes, and daily shopping, entertainment and educational activities unavailable to the remote, isolated, Stehekin Community."

Response: Thank you for your comment.

TE4000. Threatened and Endangered Species: Impact of Proposal and Alternatives.

Concern Statement: Two comments questioned the status and adverse impact determinations reached in the EA for rare and listed species such as spotted owls.

Representative Quote(s):

- “...it is unclear how rebuilding the road in this area would be “Likely to Adversely Affect” the Northern Spotted Owl as no nesting pairs have been observed as recently as 2004 and 2005. It appears that either the author(s) did not check his/her (their) facts or assumed there should be owl nests in this area, even though none have reportedly been observed recently.”

Response: Adverse impacts to federally listed species can often be indirect, and do not require physical harm to the species in question to conclude an action “is likely to adversely affect” the species. In this case, the “Likely to adversely affect” determinations for the spotted owl were based upon impacts to spotted owl *habitat* from the increased noise and human disturbance that would result from road relocation. Furthermore, the lack of confirmed nesting sites in one season does not preclude owls from nesting in future years when favorable nesting and foraging habitat exist.

VE4001. Visitor Experience: Beneficial Impact of Proposal and Alternatives.

Concern Statement: Two comments stated road closure would have a beneficial impact on various elements of the visitor experience in the upper Stehekin Valley.

Representative Quote(s):

- “The Upper Stehekin Valley is located within designated wilderness and it is the experience of wilderness that visitors here seek. Closure of the Upper Road would provide new flat trail possibilities along a beautiful stretch of wild river and a wild approach to the peaks of the Cascade Crest. I myself have hiked along this beautiful stretch and would have enjoyed these walks more had I been hiking on a trail rather than a road and not occasionally been bombarded by the noise and dust of vehicles. Closing the upper road would effectively expand the wilderness, removing an inappropriate intrusion into it.”

Response: Thank you for your comments.

VE4010. Visitor Experience: Adverse Impact of road closure.

Concern Statement: Two comments stated road closure would have an adverse impact on various elements of the visitor experience in the upper Stehekin Valley.

Representative Quote(s):

- “I had the privilege of spending every summer in Stehekin while I was growing up, as it has been used in my lifetime, I can’t think of another road in my personal experience that is used less for environmental exploitation, or more for instilling a deep appreciation of both natural and human history. I hope that when I grow old, or should I become disabled, that I can still show my family and friends the places that represent so much of my childhood, and provide so much context for my family’s background.”

Response: Thank you for your comments.

VE4020. Visitor Experience: Adverse Impact on Pacific Crest Trail experience.

Concern Statement: One comment stated that the EA failed to address adequately the impacts of the Alternatives on the PCT experience. In addition, the description of Alternative D (road relocation) failed to provide a detailed design for the new location of the PCT, so it is impossible to understand fully the nature and extent of potential impacts of the proposed new route.

Representative Quote(s):

- “To select an alternative which would degrade the experience would be out of compliance with the National Trails System Act. Current analysis is incomplete and inadequate. No detailed design work has been completed so it is impossible to adequately judge the character of the new trail. It is not clear

that a stable and maintainable location exists between the present trail location and the river. A trail location below the new road location would mean ongoing impacts from drainage runoff, disturbance from ongoing road maintenance, sounds and smells of motorized traffic and a loss of remoteness along this entire section of the PCT. Since no detailed trail design exists, the mitigation measures presented are inherently inadequate.”

Response: The Alternative C description of the EA described in general terms the proposed reroute of the PCT and included a map showing its proximity to the new road. The Affected Environment section described the natural and cultural resources in the area, along with current patterns of access and use. The impact analysis disclosed that reroute would be “closer in proximity to the PCT than the former road, and hikers and stock users would experience noise, dust, and exhaust from shuttle, Park, and private vehicles at times.” The impact analysis concludes that visitors who desire “increased solitude, natural soundscapes and remoteness” would experience “moderate to major and long-term adverse impacts.” According to CEQ guidelines (NEPA’s Forty Most Asked Questions; Question 36a.), an EA is intended to be a “...concise document, it should not contain long descriptions or detailed data which the agency may have gathered.” While the EA could have provided more detail on this point, the NPS believes the details that were provided were sufficient to support the impact analysis.

The NPS does concur, at least in part, with the assertion that the mitigation details were inherently inadequate. There simply would be no way to mitigate fully the impact of road relocation because it would place the PCT much closer to the road than at present.

VS4000. Visitor Safety: Impact of Proposal and Alternatives

Concern Statement: Two comments stated protection of visitor safety was an important justification for maintaining a road.

Representative Quote:

- “By not returning the road to the upper valley we also take away emergency services where it is most vital. It is an extremely long way from the present end of the road to the upper hiking areas. We must consider safety issues.”

Response: Section 7.5.7 of the EA (Alternative B, Visitor Access Experience and Park Operations) discussed impacts to visitor safety and park operations. Emergency services generally do not require motor vehicle access because park operations generally rely upon air support.

VU4001. Visitor Use: Impact Of Proposal and Alternatives. Adverse impact to visitors with limited physical abilities and/or limited time to visit.

Concern Statement: Forty one comments stated closing the road would substantially limit visitor use and enjoyment of the area, especially for those with limited physical abilities such as handicapped persons, children and the elderly and/or those visitors with limited time. Some of these comments questioned the criteria used to determine impacts.

Representative Quote(s):

- “Don’t think for a minute that those of us that no longer want to be called environmentalists have any less love and concern for this place. We were here before many were born and we wanted it saved for our children and all generations, but—we want it also for the handicapped, feeble, children and the working public that may only have one day, once in a lifetime to have a day trip to the end of the road in Stehekin.”
- “Families with young children and/or handicapped individuals will be forever deprived of seeing the grandeur of the park and the upper valley. The report repeatedly describes these loses as “negligible”. It is not clear what criteria were used to determine that these impacts are negligible—they are not described in the report.”

Response: The NPS sincerely empathizes with the reduced access for those with limited physical abilities. Section 7.1.3.7 (Table 14) of the EA described the criteria used to determine impacts to Visitor Access. According to these criteria, the EA concluded that those who desire continued vehicle access “moderate to major, long-term adverse impact”.

VU4010. Visitor Use: Impact of Proposal and Alternatives on Scientific Research and Collecting.

Concern Statement: One comment stated that closing the road would limit access for ecological research in the upper Stehekin Valley.

Response: The NPS agrees. However, access will still be available via foot and/or stock, as is the case for the vast majority of the Complex that is not accessible by motor vehicle. In spite of the limited access, a wide array of ecological research is ongoing in the Complex, and much of this research benefits from roadless conditions because roads (and other human uses) impact the native ecology of the area and often confound the questions the research is attempting to answer.

VU4020. Visitor Use: Adverse Impact of Proposal and Alternatives on Pacific Crest Trail hikers.

Concern Statement: One comment stated that closing the Upper Stehekin Valley Road would make it more difficult for Pacific Crest Trail hikers to resupply in Stehekin, thus making it more difficult logistically to complete the hike in one year.

- *Representative Quote(s):* “...for those who like to do the Pacific Crest Trail it makes an easy way for them to get from the landing area (which most use as a drop off point) to the Bridge Creek trailhead to continue their hike. By having this road closed it creates a burden for those Pacific Crest Trail hikers who are trying to complete that hike in one year.”

Response: The NPS disagrees. The Stehekin Shuttle will still be readily available from the Car Wash Falls parking area and at High Bridge. For those hiking northward (the vast majority), road closure will have no effect on PCT hikers because the PCT crosses the road at High Bridge. For those hiking southward, shuttle access will no longer be available at Bridge Creek. Hikers will have to continue down the PCT approximately 3 miles to the next closest shuttle pick-up at Car Wash Falls. For most long distance hikers, this additional short distance would be immaterial.

VU4030. Visitor Use: Impact of Proposal and Alternatives on Stehekin Valley Residents

Concern Statement: Two comments stated the quality of life for Stehekin Valley residents would be substantially adversely impacted by road closure.

Representative Quote(s):

- “Stopping vehicle access at Carwash Falls seriously affects up-Valley access for ourselves and for almost everyone except the super-young, super-athletic, super-equipped. This is a serious diminution of the quality of life for Stehekin residents.”

Response: Thank you for your comments.

VU4040. Visitor Use: Impact of Proposal and Alternatives on Day Hikers

Concern Statement: One comment stated the impact analysis in the EA underestimates the adverse impact to day hikers and fails to provide adequate mitigation.

Representative Quote(s):

- “Fully a third of the trails will be eliminated as day hikes and the miles of hiking trails in the valley will likely shrink as former day hiking trails are unused or unmaintained. In a recent issue of Washington Trails magazine, it is noted that the use for which demand is increasing is day hiking in wilderness as a respite from our busy lives. And yet, this assessment calls that use insignificant. the reality is, it is one of the recreational pursuits that is actually in the park and will likely increase. The only mitigation mentioned is allowing outfitted camps at bridge Creek and other locations. While important, this does not serve the same user group and creates a fee based recreation where free use existed.”

Response: Please see response to concern statement AL4030.

WH4010. Wildlife And Wildlife Habitat: Impact of Proposal and Alternatives

Concern Statement: One comment suggested that closure of the upper road would concentrate recreational use in the lower valley and cause adverse impacts to wildlife.

Representative Quote(s):

- “I would like to propose another consideration for rebuilding the road. With half the valley inaccessible (and that is how I feel with no road), all the visitors are confined to the lower valley for recreating. This has to have impacted the fish and wildlife.”

Response: The NPS disagrees. As disclosed in the EA, closure of the upper road will have a beneficial impact on fish because maintenance and use of the road will cease and aquatic habitat will improve. Similarly, impacts to wildlife are anticipated to be long term and beneficial because “road related mortality, noise and human activity would not occur”. See also Concern Statement *CC1000*.