

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

**Anchorage Field Office
4700 BLM Road
Anchorage, AK 99507
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DECISION RECORD

**Iditarod National Historic Trail Safety Shelters
Environmental Assessment # DOI-BLM-AK-1220-2010-0015-EA
Case File # AA 092352**

DECISION TO IMPLEMENT THE PROPOSED ACTION ALTERNATIVE:

It is my decision as Manager of the Bureau of Land Management (BLM) Anchorage Field Office (AFO) to accept the proposed action as stated in the environmental assessment (EA), authorizing the development of four safety shelters on the Iditarod National Historic Trail, consisting of one shelter on BLM lands at K T15S R11W Section 17, and three shelters on State of Alaska lands at K T28S R10E Section 32, S T30N R46W Section 4, K T18S R15E Section 36 (subject to State of Alaska development authorization and all other pertinent laws and regulations).

RATIONALE FOR THE DECISION:

No significant impact will occur to resources as a result of implementing the proposed action. The proposed action is not expected to be controversial, does not establish a precedent, or represent a decision in principle about future considerations, nor is it related to any other proposed actions representing cumulatively significant impacts.

The proposed action is in conformance with the BLM Kobuk-Seward Peninsula Record of Decision and Approved Management Plan of September 2008. The project implements development recommendations of the Iditarod National Historic Trail Comprehensive Management Plan (1986). The project has been considered in the context of public health and safety and consistency with regards to Federal, State, and local laws.

The project will improve public safety along the Iditarod National Historic Trail, support improved maintenance and encourage trail use. The project will provide local government and/or appropriate local cooperators with public safety facilities that encourage and engage volunteer maintenance and stewardship of the Trail. The project will also provide temporary income to economically distressed areas in remote rural Alaska, provide job skill development and training opportunities to residents and/or youth in such areas, and in general provide economic stimulation to the Alaskan economy.

ANILCA SECTION 810 COMPLIANCE:

The proposed action will not significantly restrict Federal subsistence uses, decrease the abundance of federal subsistence resources, alter the distribution of federal subsistence

resources, or limit qualified Federal subsistence user access.

ADVERSE ENERGY IMPACT COMPLIANCE:

This action has been analyzed as required by Washington Office Instruction Memorandum 2002-053 to determine if it will cause an adverse impact on energy development. The action will not have an adverse direct or indirect impact on energy development, production or distribution. The preparation of a Statement of Adverse Energy Impact is not required.

COMPLIANCE AND MONITORING PLAN:

BLM AFO will be the project manager for the development of all shelters, and ensure compliance with all applicable Federal, State and local laws. Upon completion of development, BLM will be the manager for the shelter on BLM lands at K T15S R11W Section 17, and undertake necessary monitoring to ensure that the shelter complies with all applicable laws, regulations and policies.

For the other three shelters located on State of Alaska lands (K T28S R10E Section 32, S T30N R46W Section 4, K T18S R15E Section 36), the State holds final management authority for compliance and monitoring before, during and after shelter development. BLM does not have authority to monitor or regulate the trail safety shelters or the lands on which they will be sited.



James M. Fincher
Field Manager

1/27/2010
Date

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**FINDING OF NO SIGNIFICANT IMPACT
Iditarod National Historic Trail Safety Shelters
Environmental Assessment # DOI-BLM-AK-1220-2010-0015-EA
Case File # AA 092352**

PROJECT NAME:

Iditarod National Historic Trail Safety Shelters

PROJECT PROPONENT:

Bureau of Land Management, Anchorage Field Office

PROJECT OVERVIEW AND ALTERNATIVES:

This project would construct four new winter safety shelters with cooperating partners on the Iditarod National Historic Trail (INHT) in summer 2010 to improve public safety, support improved trail maintenance and encourage trail use, and provide economic stimulus to rural Alaska. The BLM Anchorage Field Office is the federal coordinator for implementation of the INHT Comprehensive Management Plan and is the recipient of funds for this project. This project is a partnership project, with BLM AFO providing funding and technical support, local governments 'owning' the cabins on State of Alaska lands and providing youth labor for construction, and a non-profit partner coordinating and administering youth labor crews

The overall goal of the project is to improve public safety, support improved trail maintenance and encourage trail use. The project aims to provide local government and/or appropriate local cooperators with public safety facilities that encourage and engage volunteer maintenance and stewardship of the Trail. The start date of this project would be approximately May 1, 2010; estimated project completion is August 1, 2010.

In order to determine the appropriate actions to take, the BLM developed an environmental assessment (EA) in which two alternatives were evaluated: The Proposed Action, and the No Action Alternative.

PROPOSED ACTION:

Construct four new winter safety shelters with cooperating partners on the Iditarod National Historic Trail (INHT) in summer 2010.

NO ACTION:

The No Action Alternative would be to continue present public land management practices on the Iditarod NHT.

ASSOCIATED ENVIRONMENTAL DOCUMENTATION:

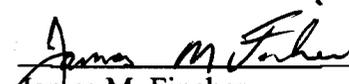
An EA (attached) was prepared to comply with the National Environmental Policy Act and BLM requirements.

FINDING OF NO SIGNIFICANT IMPACT (FONS):

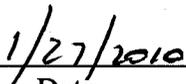
I have reviewed the EA (DOI-BLM-AK-1220-2010-0015-EA) and other relevant environmental documentation. I have determined that the Proposed Action without mitigating measures will not have any significant impacts on the human environment and that an Environmental Impact Statement is not required.

RATIONALE FOR NO SIGNIFICANT IMPACT FINDING:

Through the analysis conducted in the EA, no significant impacts to human health, safety, or the environment have been identified. Both beneficial and adverse impacts from implementing the proposed action have been considered. The proposed action is consistent with existing national environmental policies and objectives as set forth in Section 101 (a) of the National Environmental Policy Act of 1969 (NEPA). Further and based on the analysis of potential environmental impacts contained in the attached environmental assessment, it is my determination that the proposed action does not constitute a major Federal action significantly affecting the quality of the human environment and that an environmental impact statement is not required.



James M. Fincher
Field Manager



Date



**U.S. Department of the Interior
Bureau of Land Management**

Anchorage Field Office
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**Environmental Assessment
ARRA Project LDTDF0020000
*Iditarod National Historic Trail Safety Shelters***

DOI-BLM-AK-A010-2010-0015-EA
Casefile AA 092352



Location:

K T28S R10E Section 32
S T30N R46W Section 4
K T18S R15E Section 36
K T15S R11W Section 17

Prepared By:

Kevin Keeler
Administrator, Iditarod National Historic Trail
January 26, 2010

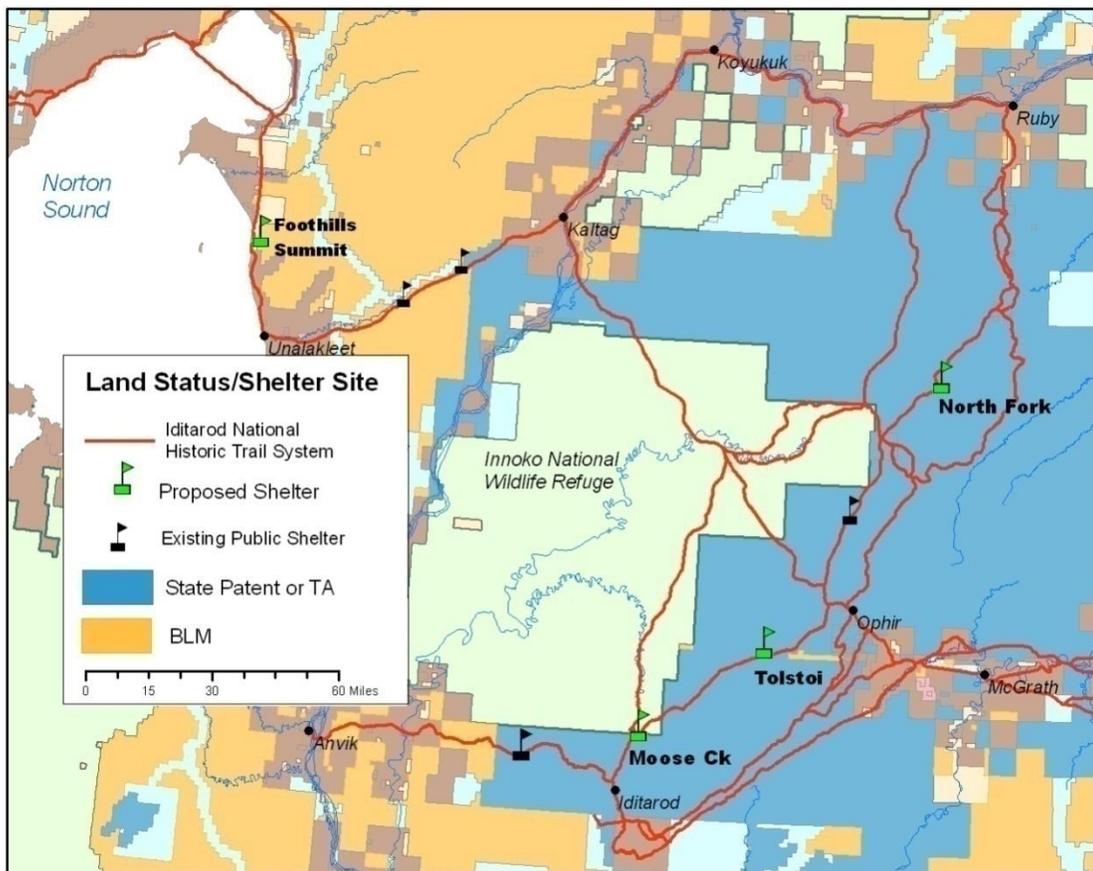
I. INTRODUCTION

A. Purpose Action Type:

Construct four new winter safety shelters with cooperating partners on the Iditarod National Historic Trail (INHT) in summer 2010 to improve public safety, support improved trail maintenance and encourage trail use, and provide economic stimulus to rural Alaska. The BLM Anchorage Field Office is the federal coordinator for implementation of the INHT Comprehensive Management Plan and is the recipient of funds for this project. This project is a partnership project, with BLM AFO providing funding and technical support, local governments 'owning' the cabins on State of Alaska lands (see below) and providing youth labor for construction, and a non-profit partner coordinating and administering youth labor crews.

B. Location and Land Status

Three shelter sites are located on State of Alaska owned and managed lands along the Iditarod Trail, and the fourth site is located on BLM lands along the INHT. For the three shelters on State lands, the shelters will be 'owned' by nearby local governments or community groups with site leases from the State. The State of Alaska is responsible for permit review and authorization of site leases and development on State lands. One shelter would be located on BLM lands north of Unalakleet, and will be managed by BLM.



Two of the three shelters on state lands (Tolstoi and Moose Creek) are located on a segment of the Iditarod NHT commonly known as the "Hunter Trail". The third shelter on state lands is located on the Ophir-Ruby segment of the INHT.

Site Name	Land Ownership	Legal Description	State easement segment	Lat/Lon (WGS 84)	USGS Quad
Tolstoi Headwaters	State of Alaska	K T28S R10E Section 32	ADL 230023B Segment 1	63 00' 58.90"N 157 00' 4.04"W	Ophir A-2
Moose Creek	State of Alaska	S T30N R46W Section 4	ADL 230023B Segment 2	62 43' 12.15"N 157 55' 8.22"W	Iditarod G-4
North Fork Innoko R. Xing	State of Alaska	K T18S R15E Section 36	ADL 230023A	63 53' 5.15"N 155 51' 5.93"W	Medfra D6
Foothills Summit	BLM	K T15S R11W Section 17	not applicable	64 11' 04.26"N 160 53'54.75"W	Norton Bay

C. Relationship to Statutes, Regulations, Policies, Plans or Other Environmental Analyses

The National Trails System Act is a primary source of the authority for the proposed action, along with the Federal Land Policy and Management Act (FLPMA), and the American Recovery and Reinvestment Act of 2009.

The role, responsibilities, and limitations of authority for the Administrator of a unit of the National Trail System are defined in the National Trails System Act (NTSA). In the Act (P.L. 90-543, as amended through P.L. 109-418, December 21, 2006) the Secretary of Interior is charged with responsibility for Administration of the Iditarod NHT. The responsibility for Administration is delegated to the Bureau of Land Management Anchorage Field Office.

Authority is also provided under the American Recovery and Reinvestment Act of 2009. Section 3 identifies the following objectives, which the proposed action aims to achieve: *"...to preserve and create jobs and promote economic recovery... [and] to invest in transportation, environmental protection, and other infrastructure that will provide long-term economic benefits..."*.

Development of new safety shelters along the Iditarod National Historic Trail is recommended in the interagency Comprehensive Management Plan (CMP) for the Trail (1986). Subsequently in 1987 BLM and the State of Alaska entered into a Interagency Agreement to implement the CMP within the limits of respective agency resources and limitations (BLM Interagency Agreement AK 974-MU7-INHT-03).

The most recent Statewide Comprehensive Outdoor Recreation Plan (2009) identifies the development of new public use cabins and shelters as the third highest public priority for the development of new public recreation facilities throughout the State (<http://dnr.alaska.gov/parks/plans/scorp/>)

D. Conformance With Land Use Plans

For the three shelters on State lands, the proposed action conforms with the management guidelines of the adopted State of Alaska Kuskokwim Area Plan. The shelters located on State of Alaska lands come under the management authority of the State of Alaska, not BLM, and therefore are subject to State land development permit application, review, appeal and determination policies and procedures.

For the shelter on BLM lands, the proposed action is within the boundaries of, and conforms with the adopted BLM Kobuk-Seward Peninsula Resource Management Plan (September 2008).

E. Purpose and Need for the Proposed Action

The purposes of the project are to improve public safety, support improved trail maintenance and encourage trail use. The project aims to provide local government and/or appropriate local cooperators with public safety facilities that encourage and engage volunteer maintenance and stewardship of the Trail. The project will also provide temporary income to economically distressed areas in remote rural Alaska, provide job skill development and training opportunities to residents and/or youth in such areas, and in general provide economic stimulation to the Alaskan economy.

Winter safety shelters, also known as relief cabins or safety cabins, were a common feature on Alaskan trails in the early 20th century. Between WWI and WWII the Alaska Road Commission hired local residents to build a number of safety shelters on trails that are now part of the Iditarod National Historic Trail system. Today only a few original shelters remain, yet overland inter-village travel continues to be a necessity along the Trail.

Other than expensive commercial air service, rural Alaskans in 20 communities on the Iditarod NHT have no other winter inter-village travel option than the snowmobile for shopping, visiting relatives and friends, and participating in subsistence activities. Winter users of the Iditarod NHT (from November to April) are commonly exposed to severe and even life threatening winter weather. This hazard is exacerbated by the vast and uninhabited distances found between a number of rural villages and/or existing shelters.

To meet the safety needs of Iditarod NHT trail users, the Comprehensive Management Plan for the Trail (adopted 1986) recommended the development of new safety shelters. Since that time, BLM developed four shelters on segments of the Trail crossing BLM lands, and assisted partnership projects that have developed two other shelters (see map on page 1).

II. PROPOSED ACTION AND ALTERNATIVE

A. Proposed Action

Construct four new winter safety shelters at locations shown on map on page 2.



1. Proposed Action Building Size, Site Clearing and Total Facility 'Footprint'

Two sizes of shelters, 16'x16' and 12'x12', with two of each being built, are proposed. Both use the design shown in the photo below. The walls consist of three side squared 6 inch Alaskan white spruce logs. The foundation is 6 treated timber post cribbing boxes, with the floor laid atop the cribbing. No subsurface foundation posts are used (see photo at left).

A pit privy would be installed at each safety shelter. The cabin and the privy are typically

separated by a minimum of 30 feet and screened by existing vegetation.

Approximately 1,000 square feet of mature vegetation would be removed for construction of the shelter and privy: the cleared shelter footprint would occupy approx. 25'x25', and the cleared privy approximately 20'x20'.



Cleared area footprint and temporary materials storage area for 16'x16' shelter built on Iditarod NHT at Big Yetna River, Sept. 2009. For scale, horizontal timbers are 16 foot long.

Temporary trampling and removal of small brush would occur at two other 25'x25' areas used for storage of building materials (immediately adjacent to the building site) and as the camp kitchen/tool storage area. The temporary construction camp will consist of a covered kitchen/cook area, a wash up area, and individual tents.

2. Proposed Action Access for Construction and Public Use

Site access for construction would be by helicopter. Treeless areas near each building site may be used for temporary helicopter landing zones (LZ's). Timber poles cut at the job site cabin site may be used as a temporary pad for the helicopter.

Shelter building materials are not being harvested on site due to the lack of adequate vegetation. Shelter materials would be transported to the building site by helicopter longline. For the 16x16 cabins, approximately 15 tons of materials would be involved, including approximately 72/16 foot logs, 5/24 foot beams and a variety of other dimensional lumber and plywood. For the 12x12 cabins, approximately 7 tons of materials would be involved, including approximately 72/12 foot logs, 5/17 foot beams, and a variety of other dimensional lumber and plywood. Total number of helicopter longline loads to each camp will range between 12 and 18 loads (lower number for the smaller shelter).

Approximately 12 loads of materials (including the previously mentioned logs) and 2-3 loads of tools and camp equipment would be transported on site, with the materials being placed within the development area for the cabin immediately next to the cabin site.

After construction, access for use for the shelters on State lands would be limited to winter time only via snowmachine and dogsled on the Iditarod NHT. Ski planes may also occasionally be used to access the site after the shelters are opened to the public. Ski plane access relies on optimal snowcover to enable safe landings and take-offs on tussock-tundra, and therefore may not occur every year. ATV access to the shelters on State lands is not feasible due to the significant distances and geographic obstacles between possible ATV access points and the shelters.

For the shelter on BLM lands (Foothills Summit shelter) public access would primarily be during winter/snow-covered seasons via snowmachine and dogsled via the INHT. During the non-snow months the shelter may be accessed via ATV from Shaktoolik for berry picking or hunting (approximately 15 miles distance). ATV access to the shelter from Unalakleet is not feasible without use of a boat to transport the vehicle north of the major streams separating Unalakleet and the shelter (an approximate 20 mile boat trip on Norton Sound).

Commercial hunting and/or guiding is not an authorized use of the shelters, however the BLM Foothills Summit shelter would be open to legal sport and subsistence hunting and trapping activities for muskox, moose, wolves and wolverine.

3. Proposed Action Waste Types, Sources and Disposal

Small quantities of human and solid wastes will be generated at the site during the life of the facility.

An outhouse/pit privy would be constructed at each cabin site in a location and manner consistent with State of Alaska Department of Environmental Conservation (ADEC) requirements. No pit privy will be established in an area subject to flooding. The pit privies will not be established within 100 feet, measured horizontally, from the mean annual high water level of a lake, river, stream, spring, or slough; the mean higher high water level of coastal waters; or any source of drinking water. The vertical separation between the lowest point of a pit privy and the water table, measured during the season of the year with maximum water table elevation, will be at least four feet.

Food waste generated during construction, along with all other food products, are stored behind a temporary electric fence, and removed offsite when the construction camp is closed, along with all other non-burnable building materials. Remaining untreated wood scrap building materials would be left for kindling.

A non-toxic, non-hazardous log oil treatment (tradename Woodguard) would be used to protect the cabin logs; between 5 and 10 gallons would be applied. Wipe up rags and personnel protection garments would be removed along with construction waste.

Small quantities of petroleum, oil, and lubricants (POL) would be used on site to power devices such as camp stoves, lanterns, generator, and chain saws. All POL will be removed upon completion of the construction projects. Spill cleanup kits would be brought to the camp, consisting primarily of sorbent pads, spill absorbent material, and personnel protection. BLM on-site staff are trained in State of Alaska spill reporting requirements and initial spill response protocol.

No aviation fuels would be stored or used at the site; helicopter refueling during materials transport to the site will occur offsite.

4. Proposed Action Hazardous Substances

No hazardous substances (per TSCA and RCRA) will be used at the site, and no hazardous wastes will be generated during construction.

5. Proposed Action Number of People Using Site

A construction crew of 8 persons is proposed for construction of each cabin, not to exceed twelve persons on site. Site preparation, materials mobilization, and construction is anticipated to take between 7 and 10 days. During the life of the shelter, annual use is projected to be less than 100 persons / year.

B. No Action Alternative

The No Action Alternative would be to continue present public land management practices in the area. Existing activities on public lands would continue at current levels, or as modified by other factors.

III. AFFECTED ENVIRONMENT

A. Critical Elements

It has been determined that the following Critical Elements of the human environment are either not present or would not be affected by the Proposed Action or the No Action Alternative:

- Air Quality
- Areas of Critical Environmental Concern
- Environmental Justice
- Floodplains
- Native American Religious Concerns
- Prime or Unique Farmlands
- Water Quality (Surface and Ground)
- Wetlands/Riparian Zones
- Wild and Scenic Rivers
- Wilderness

1. Cultural Resources

The 1982 Resource Inventory for the INHT, field notes and maps gathered in preparation for the Inventory, and the Alaska Heritage Resource Survey (AHRs) files were consulted in advance of the selection of sites described in the Proposed Action. The AFO archaeologist did an on the ground inspection of the Moose Creek and North Fork Innoko crossing locations on June 18, 2009.

Due to shifts in the location of the used and maintained alignments of the Iditarod Trail between 1910 and 2010, none of the proposed shelter sites are located in the vicinity of the alignment used in the early 20th century. The two sites between Ophir and Iditarod are located within two miles of the historic alignment, and the other two shelters are within 6 miles of the historic alignment.

Undocumented, Historic Trail era cultural resources may be located in the immediate vicinity of each of the proposed sites, although the potential for undiscovered cultural resources is low. Also, subsurface archeological sites have a low potential in areas which are not located near a water source (which is a

characteristic of all sites). See attached 'Report of Examination for Cultural Resources' for more information.

2. Invasive, Non-native Species

Survey of the proposed sites for invasive, non-native species have not been conducted. An inventory of invasive species along the Iditarod NHT concludes while the majority of the trail is weed free, and that invasive species are limited to human affected sites such as airstrips and shelter cabins along the Trail. It appears that ground disturbance at sampled sites is more highly correlated with the occurrence of invasives rather than the use of non-native species at a site. (unpublished draft report, Alaska Natural History Program, Dec. 2009)

Bedding straw is sometimes carried by sled dog mushers participating in the Iditarod Sled Dog Race, which passes the Foothills Summit site on an annual basis, and the other shelter sites on a biannual basis. The BLM permit for the race requires the use of certified weed-free straw at BLM shelter cabins, to prevent the introduction of invasive species. Most non-certified weed-free straw contains some weed species and there is some potential that populations of invasive species could established themselves at disturbed sites.

3. Threatened or Endangered Species

There are no threatened and endangered (T&E) animal species known to occur in the regions the shelter sites are located in. There are no designated critical habitat areas for any T&E animal species in the regions the sites are to be located.

4. ANILCA §810 Subsistence

The lands for three of the sites for the proposed action are currently patented or Tentatively Approved by the State of Alaska. These lands do not meet the ANILCA sec 102 (3) definition of Federal Public Lands under the Federal Subsistence Program. In the case where lands remain validly selected by or are conveyed to State or Native interests the authority for subsistence and other management of fish and game resides with the Alaska Department of Fish and Game.

The proposed action also occurs on one site which is BLM managed lands and does fall under the Federal Subsistence Program. These federal lands occur in areas that are fairly remote from local villages and important subsistence use areas. The most intensive subsistence hunting and fishing activity is believed to be concentrated on lands conveyed or selected by the Native Village corporations. Subsistence activities are a key factor in the selection of lands by Native individuals and corporations, and Native Allotments are typically claimed based on a family's use of a site for subsistence activities.

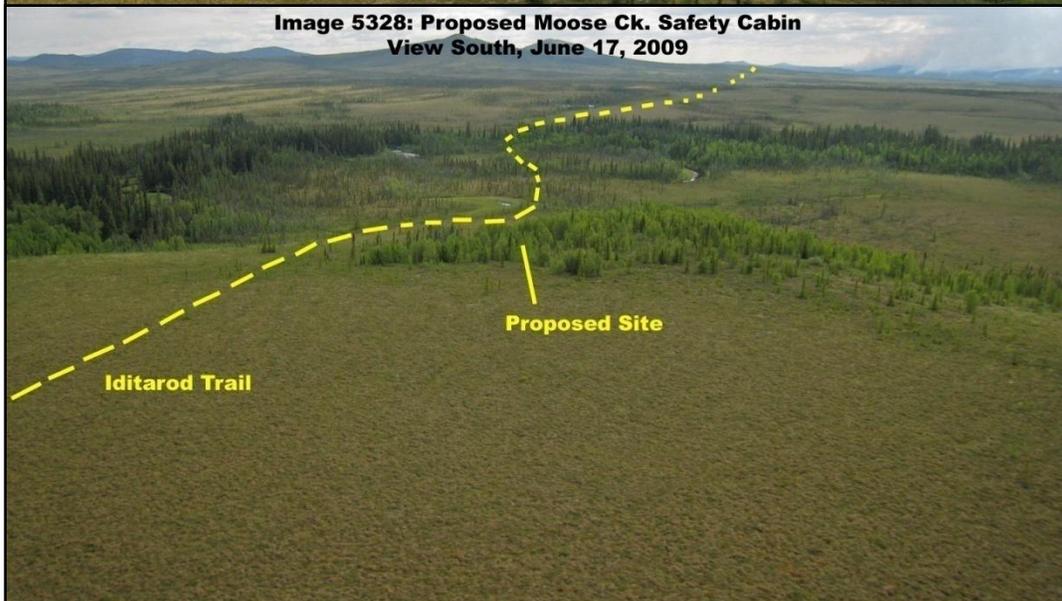
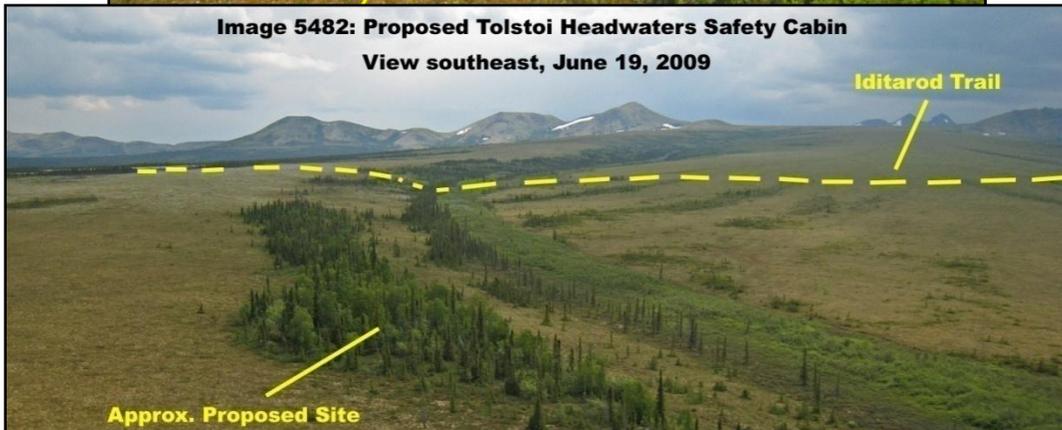
For the Foothills Summit site north of Unalakleet, residents of that community and Shaktoolik visit the general area in pursuit of subsistence resources such as moose, caribou, bear and small game. The majority of subsistence takes place in the form of small game gathering on the extensive wetlands and tidal swamps approximately 6 trail miles northwest of the site and ranging for many miles to the north and west.

The Foothills site lies within the potential winter range of the Western Arctic caribou herd. ADFG satellite monitoring between 1997 and 2004 of caribou fall migration routes in this region shows no use at the immediate site area, and very little use within a dozen miles of the site (Kobuk/Seward Peninsula ROD/Approved RMP, BLM 2008). The Western Arctic Caribou Herd utilize forage resources and habitat on the Seward Peninsula, however they are present on the Seward Peninsula primarily during only the

winter months, and generally only in the eastern portion of the Peninsula. The Western Arctic Caribou Herd has only recently pushed its winter use area into the central portion of the Seward Peninsula. According to Dau (2007) substantially fewer caribou have wintered on the Seward Peninsula during the winters of 2003-2004 through 2006-2007 compared to 1996-1997 through 2002-2003. The timing and use of the Seward Peninsula has substantially reduced subsistence opportunities by Shaktoolik and Unalakleet residents

5. Visual

The three sites proposed on State lands are located within stands of mature birch forest, as seen below.



For the Foothills Summit site on BLM lands, the Visual Resource Management from the BLM 2008 Kobuk/Seward Peninsula ROD/Adopted RMP is Class III. From the RMP “the objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not detract from the existing landscape.” (p. RMP-44)

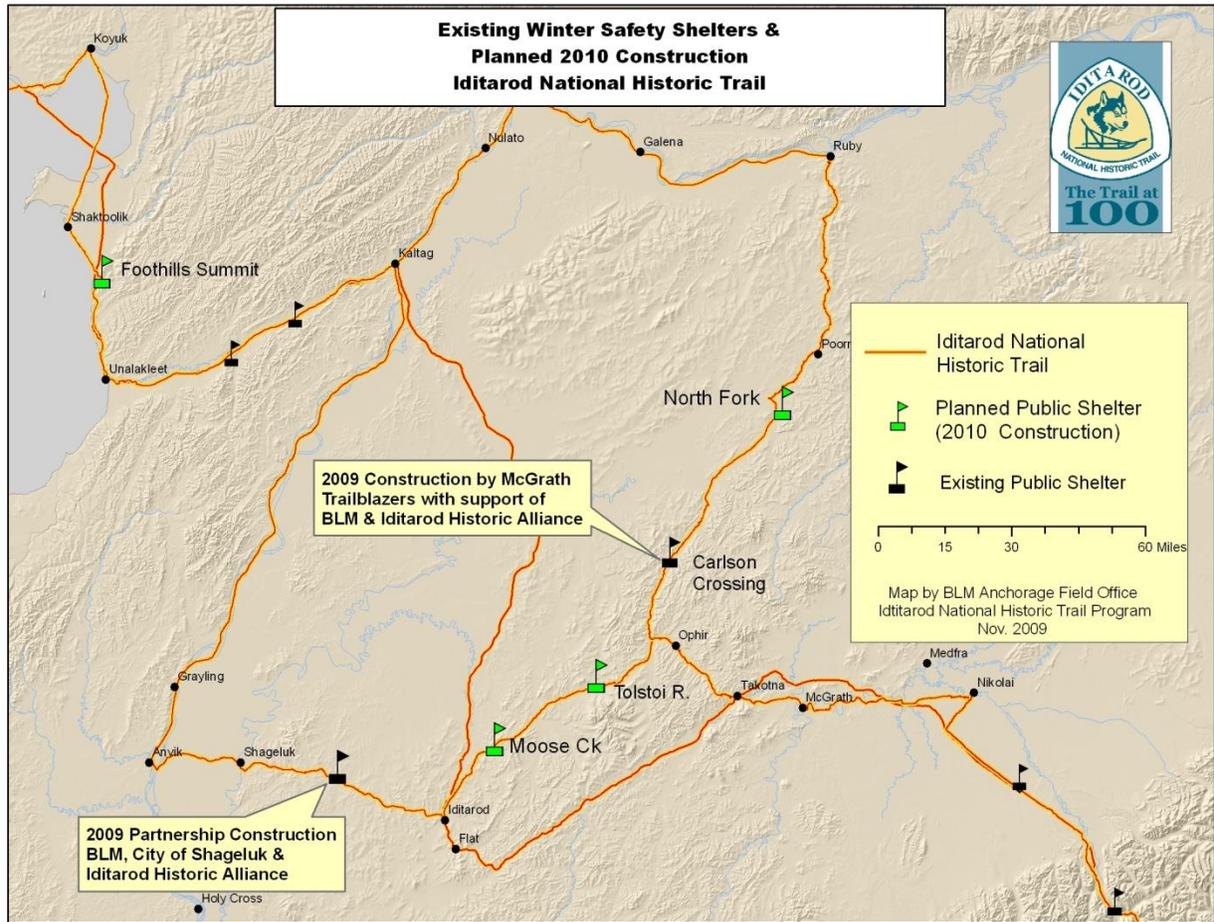


The Foothills Summit site is immediately south of the crest of one of a series of high rolling hills between Unalakleet and Shaktoolik (see site area photo above; view south, March 2009). Located at approximately 800 feet above sea level, site vegetation is a mix of dwarf spruce, willow, and dry tundra species. The site will not be visible from Unalakleet or Shaktoolik, although it may be visible from the Trail while approaching the site from the south.

6. Recreation

Most human use of the INHT segments on which the shelters are proposed is for non-recreational purposes (i.e., intervillage transportation, subsistence activities such as trapping and hunting). Only one site, the Foothills Summit site, may currently experience a slight amount of recreational use exclusive of transportation or subsistence activities.

Therefore for this assessment the analysis of recreation use is limited to uses associated with competitive long-distance winter overland sporting events (i.e., Iditarod Sled Dog Race, Iron Dog snowmobile race, Iditarod Invitational Ultramarathon). (Further discussion of current non-recreational use patterns are found in the following section on Affected Environment / Transportation.)



For all site areas and trail segments, there has never been any attempt to systematically gather comprehensive trail use data. Estimates given here are based on observations by BLM staff and anecdotal information gathered from local residents. The unit of measure, a “use day”, is defined as *one entry to or passage through a particular area in a 12 hour period*. The following estimates are for total use, including recreational, transportation, and subsistence related use.

For all sites (with the exception of the Foothills Summit site), current recreation use is physically limited to winter months only due to the geographic impediments to overland or fixed wing access. The majority of winter use is via snowmachine, with a smaller portion by dogsled, and an even smaller portion by foot, ski, or bike. Although summer motorized access is largely impossible for all shelters on State lands, the use of ATV’s for access is considered a generally allowable use and is legal.

Motorized access to the Iditarod NHT on the BLM lands in the area of the Foothills Summit site is limited to a Gross Vehicle Weight Rating (GVWR) of 2,000 pounds, and limited to existing trails (page 40, Kobuk/Seward Peninsula Approved ROD/RMP).

For the shelters on the ‘Hunter Trail’ (Ophir-Iditarod), in the past, little over-the-snow recreation use (less than 100 user days) is estimated for even-numbered years (i.e., years the Iditarod Sled Dog Race did not follow this route). Recreation use has mainly been for individuals running trap lines. Use is

constrained by annual snowfall, as both extremely high and low amounts discouraging use. Both record high and low amounts of annual snowfall have been recorded in this area within the past decade.

On odd-numbered years, the Iditarod Sled Dog Race travels south across the 'Hunter Trail' and passes the proposed shelter site areas. On those years in the past, the number of use days on the Hunter Trail is estimated by the author to be around 300 to 400 user days per year.

The segment on which the North Fork Innoko shelter (Ophir-Ruby) is proposed has perhaps experienced twice as much use as the Hunter Trail (approximately 400 user days per "odd" numbered year on non-sled dog race year, and upwards of 1,000 user days on "even" numbered race years).

The segment on which the Foothills Summit shelter is located (Unalakleet to Shaktoolik) is used annually by the Iditarod Sled Dog Race (one pass heading north) and the Iron Dog Snowmachine Race (heading both north and south). Current annual use levels are estimated at 2,000 use days for all activities and do not change annually due to changes in race routes.

Foothills Summit site is accessible by a 15 mile one-way ATV trip from Shaktoolik, using mostly the beach for a firm travel surface. A private cabin is located three miles to the northwest of the shelter site area,



on the wetland flats below the hill on which the site is located. Analysis of high resolution aerial photography shows a number of braided, ponded and affected ATV travel paths in the vicinity of the private cabin and traveling to other destinations (3 miles north of the proposed site), including the alignment of the Iditarod Trail.

There has not be a ground survey of the Foothill Summit area at the time of this assessment. Aerial photography shows that the

tundra vegetation overlain by the Iditarod Trail to the north of the site area is also currently impacted from trail use (see above), although to a lesser degree than the wetlands 3 miles to the NW.

Whether summer or winter trail use is causing the shown above impacts has not been conclusively determined. Possibly the observed conditions are caused by repeated winter use that compacts of the travel path snowpack, resulting in the soil horizons freezing deeper and staying frozen longer than adjacent un-affected areas. This is a common on winter trails in the region, due to the low levels of insulating snow commonly received or retained in the region. The deeper freeze level in the travel corridor results in a later thaw date for the travel path, and has a tendency to "pond" snow melt water that might be otherwise absorbed into un-impacted soil horizons outside the travel path. These factors working alone or together can contribute to a change in vegetation within the travel corridor.

The distinct double ruts of ATV use seen on the wetland areas to the north are not evident on the Iditarod Trail as it approaches the site area from the north, on a north facing slope. While this is in contrast to distinct double rutting and braiding seen in the same set of photography within 3 miles, it may be due to the wetland conditions found to the north versus the rocky substrate typically found on hilltops in the site area.

Some changes in tundra vegetation of the trail path on the south side of the site area are also evident, but may be the result of a lower number of ATV use days (a large waterway at the bottom of the hill impedes further summer overland ATV travel).

7. Transportation

Perhaps the primary determinant for the amount of use for all of the proposed site areas in the past decade and continuing into the future is the price of fuels and lubricants, which are used by most recreationists to access the potential site areas via snowmachine. In 2008, fuel and lube oil prices skyrocketed nationwide, and already high prices in Alaska went to record levels (\$6/gallon in coastal communities like Unalakleet, and as high as \$8/gallon in remote interior communities like Takotna).



2008 fuel prices and quantity for two snowmobiles to travel between McGrath and Ruby or McGrath and Shageluk.

The effect of such dramatic increases was to significantly decrease the amount of winter backcountry use by rural Alaska snowmachine drivers. One Unalakleet driver observed that before the cost spike, he drove 4,000 to 5,000 miles annually on a snowmachine. After the cost increases, his annual mileage decreased to around 1,500 miles annually, and he would only go out when his trips would “put food on the table” via subsistence activities (Keeler, pers. comm., 2008).

In the past year, fuel and lube oil costs have not decreased to the extent experienced in the lower 48 states, and are not expected to decrease any time in the foreseeable future.

The Hunter Trail is part of a contemporary 180 mile overland winter connection between the Yukon River villages of Shageluk, Anvik, etc. to the Kuskokwim River communities of Takotna, McGrath, etc. Due to historic settlement patterns of both native and non-native populations, traditionally there has been minimum interchange between the two regions. The Yukon River villages mentioned are part of the Iditarod Area School District headquartered in McGrath; in

winter most travelers between the two areas need to take three separate regional commercial air flights over a period of two days, via Anchorage, to reach the other community.

In the winter of 2009-2010, two new public shelters were in the process of being opened on the Shageluk-Iditarod section of the INHT, which in turn connects to the to the Hunter Trail from the south. It is not known what effect these two new shelter cabins will have on the use patterns of the Hunter Trail, although it is forecast to be slight, as the Trail traverses 90 miles of uninhabited and unsheltered tundra high country exposed to severe winter winds and whiteouts.

The segment on which the North Fork Innoko shelter (Ophir-Ruby) is proposed experiences probably twice as much use as the Hunter Trail (approximately 400 user days per year on a non-sled dog race year, and upwards of 1,000 user days on race years). Historically and currently there significantly more interchange between the two regions, as mining operations were moved overland between Ruby and Ophir, and Yukon and Kuskokwim families have intermarried over the years. Therefore this segment is used annually for by villagers traveling to visit relatives. The Ophir-Ruby segment is also used for the Iditarod Sled Dog Race on even numbered years, and annually for the Iron Dog snowmachine race.

The segment on which the North Fork site is proposed (Unalakleet-Shaktoolik) is the most heavily traveled segment of all analyzed for this assessment. Intervillage travel between Shaktoolik and Unalakleet, separated by 35 miles, is a nearly daily occurrence during the winter, given the proximity of the two communities. Given the small number of daylight hours in the winter, much of the use occurs in the night, and it is not uncommon for trail users to be traveling at any hour of the day. Current annual use levels are estimated at 2,000 use days for all activities.

8. Human health and safety

Winter trail users on the Iditarod NHT are at risk from injury and/or death due to exposure to severe winter weather. From October to May trail users can be commonly exposed to a combination of high winds, blizzards, white-outs, and/or extreme low temperatures.

The Iditarod NHT segments proposed for shelter development are among the most isolated and/or exposed sections of the trail. The two segments on which three of the shelters are proposed (Ophir-Iditarod, Ophir-Ruby) are both uninhabited and without any shelter for at least 180 miles each. Large stands of sheltering vegetation are extremely infrequent south of the North Fork shelter site, and virtually non-existent on the 'Hunter Trail'.

The lack of shelter is a disincentive for volunteer trail packing, marking and maintenance. When packing a new trail without a destination shelter at the end of their effort, volunteer trail breakers must return back to their point of origin, usually their hometown. Therefore maintenance is limited to a distance of 20 to 30 miles outside of a community, if at all.

Winter hazards are commonplace for the users of the 40 mile Unalakleet-Shaktoolik segment on which the Foothills Summit shelter site is located. Because winter inter-village trail use is already frequent, there have been a number "near-misses" where a trail user(s) snowmachine broke down during a blizzard or high wind event. In one case a trail user required amputation of frostbite lower extremities (Keeler, pers. comm., 2010).

Participants of the winter long-distance overland racing events occurring on the Iditarod NHT are exposed to the same winter hazards, with some participants bivouacking in dogsleds or snowbanks during blizzards and/or requiring rescue.

Aircraft users, both commercial carriers and charters, and private individuals, often fly on routes that follow or intersect the Iditarod NHT. One of the historic shelters on the Iditarod NHT, the Rohn Public Shelter Cabin, was originally developed in 1938 to provide refuge for stranded fliers in the Alaska Range. Current aeronautical charts for Alaska often depict existing shelter cabins in extremely remote areas, including public shelters on the Iditarod NHT.

Most communities on the Iditarod NHT maintain a formal or informal "Search and Rescue" group, often

affiliated with community volunteer fire department, to undertake searches for missing, overdue or stranded travelers. In situations where local resources are not immediately adequate, the Alaska State Troopers becomes the Incident Commander of record and gathers and coordinates other resources, especially airborne resources, to accomplish the mission. This includes callouts of the State Trooper helicopter, Air National Guard helicopters, and the Civil Air Patrol, all with attendant hazards for crew, and associated expenses for operations.

9. Hazardous and Solid Wastes

The subject site area lands are not within one-half mile of an EPA National Priority Listed (NPL) site, a State Superfund site, or a Treatment, Storage or Disposal Facility. There are no known underground storage tanks, dumps, or contaminated wells on or adjacent to the lands in the proposed action. There are no hazardous or solid waste sites on or near the proposed locations for this project.

10. Wildlife

In the area of Foothills Summit Cabin, Caribou, muskox, moose, wolves and wolverine are found. In the area of North Fork, Tolstoi and Moose Creek cabins, moose, wolves, martin, wolverine and muskrats are found. These species are hunted or trapped legally by both sport and subsistence hunters in these areas. Commercial hunting and/or guiding is not an authorized use of the shelters, however BLM shelter cabins would be open to legal sport and subsistence hunting and trapping activities for these species.

IV. ENVIRONMENTAL CONSEQUENCES

A. Impacts of the Proposed Action:

1. Cultural Resources

With a recommendation for future monitoring, no further consultation is necessary under section 106 of the National Historic Preservation Act. See the attached 'Report of Examination for Cultural Resources' for more information.

2. Invasive, Non-native Species

An increase in area of disturbed ground and exposed soil on the trail, adjacent to the trail, and off-trail would result in the some increase in potential for establishment of invasive, non-native plant species.

3. Threatened and/or Endangered Species

No threatened or endangered species are likely to occur at the proposed shelter sites; there are no threatened and endangered (T&E) animal species known to occur in the regions the shelter sites are located in.

The impact of the proposed action and alternatives on threatened and endangered plants and animals and their habitats has been evaluated in accordance with the Endangered Species Act of 1973, as amended. Based on currently available information, the proposed action would not affect any threatened or endangered species or their habitats. Therefore, no consultation with the U. S. Fish and Wildlife Service is considered necessary pursuant to Section 7 of the Act and none will be undertaken. For more information, see the attached "Threatened and/or Endangered Species Evaluation".

4. ANILCA §810 Subsistence

The lands for three of the sites for the proposed action are currently patented or Tentatively Approved by the State of Alaska. These lands do not meet the ANILCA sec 102 (3) definition of Federal Public Lands under the Federal Subsistence Program. In the case where lands remain validly selected by or are

conveyed to State or Native interests the authority for subsistence and other management of fish and game resides with the Alaska Department of Fish and Game.

The proposed action also occurs on one site which is BLM managed lands and does fall under the Federal Subsistence Program. These federal lands mostly occur in areas that are fairly remote from local villages and important subsistence use areas. The most intensive subsistence hunting and fishing activity is believed to be concentrated on lands conveyed or selected by the Native Village corporations. Subsistence activities are a key factor in the selection of lands by Native individuals and corporations, and Native Allotments are typically claimed based on a family's use of a site for subsistence activities

A. Fisheries

The proposed action would not significantly reduce harvestable fisheries resources that are available for subsistence use. The proposed action would not alter the distribution, migration or location of harvestable fisheries resources. The proposed action will not create any legal or physical barriers that would limit access by subsistence users of the fisheries resource.

B. Wildlife

The proposed action would not alter the distribution, migration or location of harvestable wildlife resources. The proposed action would not create any legal or physical barriers that would limit subsistence harvest and access. The impacts to subsistence resources associated with this proposed action will be negligible. For further details, see the attached 'ANILCA §810 Evaluation and Findings'.

Some additional surface damage to vegetation may occur to the already effected existing trail corridor leading from Shaktoolik to the Foothills Summit Site on BLM lands. Recreation users are required to stay on the existing trail; subsistence users are allowed to travel off-trail for subsistence purposes only. Minor surface damage may occur, including the establishment of new linear ATV paths originating at the Foothills Summit shelter and traversing nearby treeless ridges in pursuit of subsistence species. It is anticipated that the paths will be distinguished by, and limited to some stripping and crushing of tundra vegetation, and will not result in removal of the vegetation to the soil.

5. Visual

All shelters may be visible from the air, and the 'Hunter Trail' shelters and Unalakleet-Shaktoolik shelter may be visible from a distance when approaching on the ground, but due to small size, natural coloring, and placement in sheltering vegetation should not distract visually from the surrounding landscapes.

6. Recreation

Recreation use of the Iditarod NHT would increase slightly on the trail segments identified in this document for development of new safety shelters. New users may include individual, unguided recreationists, including users from the nearest communities using the shelter as a destination. The shelters may be used as a destination for school groups and/or educational programs. Commercial tour operators may provide access via guided snowmachine tours on the trail segments with the new shelters (2009 pers. comm., Keeler).

The shelters may create new use patterns for the winter long-distance overland racing events occurring on the Iditarod NHT, primarily the Iditarod Sled Dog Race, which would pass by at least two of the new shelters on any given year. Race contestants may use the shelters as a layover stop during their passage over the Trail.

Some additional surface damage to the vegetation may occur on the trail corridor leading from Shaktoolik to the Foothills Summit Site on BLM lands. Recreation users are required to stay on the existing trail; subsistence users are allowed to travel off-trail for subsistence purposes only.

7. Transportation

The shelters will enhance and encourage overland winter transportation between the Yukon River and Kuskokwim River communities Ruby, Grayling, Anvik, Shageluk and Takotna, McGrath and Nikolai, and between Unalakleet and Shaktoolik. It is unknown if the shelters will directly result in the number of travelers between these communities, as their availability is secondary to the cost of fuel in determining regional transportation patterns.

The shelters will support, and may lead to improved maintenance, such as signing, brushing and trail packing to the winter trails on which they are located. Local community volunteers will have the ability to extend their maintenance activities farther along the trail with new remote overnight shelter opportunities.

8. Human health and safety

Human health and safety will be significantly improved on the segments where the new shelters are located. The availability of the shelters may prevent the loss of life, and/or mortal injury. Trail user classes potentially affected by enhanced safety will be recreationists, subsistence user, overland travelers, SAR personnel, and to a lesser extent aircraft users.

Costs for SAR operations borne by local, state and federal governments may be affected positively by the development of the new shelters.

9. Hazardous and Solid Wastes

Small quantities (under 5 gallons) of POL for camp activities and cabin construction will be brought to and used at the shelters. Spills of POL which may accidentally occur incidental to shelter construction will be immediately and completely cleaned up by the BLM to meet the most stringent standards of ADEC regulations. No hazardous wastes will be generated under the Proposed Action. No on-site storage of POL will be authorized after construction is completed, except at the discretion of, and with a permit from the managing agency.

Some solid waste (household type trash) and small amounts of human waste will be generated at each site during development, construction, and subsequent use by travelers on the INHT. Any trash not backhauled by users would be removed during periodic inspections by the shelter managers.

10. Wildlife

In the area of Foothills Summit Cabin, Caribou, muskox, moose, wolves and wolverine are found. In the area of North Fork, Tolstoi and Moose Creek shelters, moose, wolves, martin, wolverine and muskrats are found. This area is remote, and hunting and trapping are common activities throughout this region. However, the building of shelter cabins along the Iditarod Trail offers an increased level of ease and safety of travel, likely increasing the number of hunters from in and outside the area to hunt in the region, and potentially increasing the hunting success of hunts. Use of the cabins by hunters would potentially increase hunting and trapping pressure thereby increasing the hunting and trapping take and reducing population levels of these species.

B. Impacts of the No Action Alternative**1. Cultural Resources**

This alternative will cause no change in the affected environment.

2. Invasive, Non-native Species

This alternative may prevent the introduction and colonization of a small square footage of disturbed soil at up to four sites by a limited number of invasive species .

3. Threatened or Endangered Species

This alternative will cause no change in the affected environment.

4. ANILCA §810 Subsistence

This alternative will cause no change in the affected environment.

5. Visual

This alternative will cause no change in the affected environment.

6. Recreation

This alternative will cause no change in the recreation use patterns of the Iditarod NHT. Most recreational use will continue to be in late winter/early spring, and be associated with the long distance winter overland competitive sporting events that occur at that time.

7. Transportation

This alternative will cause no change in transportation patterns on the Iditarod NHT. The lack of overnight remote overnight shelters on extended distance segments of the Trail will continue to discourage use of the route for overland winter transportation, and discourage trail maintenance by local volunteers.

8. Human health and safety

This alternative will cause no change in the current human health and safety risks experienced by users of the Iditarod NHT. Trail users will continue to experience risks to health and safety when using the trail, and a few may experience injury or death. Public spending for search and rescue activities (SAR) for trail users will continue at the current level.

9. Hazardous and Solid Wastes.

This alternative will cause no change in the affected environment.

10. Wildlife.

This alternative will cause no change in the affected environment.

C. Cumulative Impacts**1. Proposed Action**

Potential cumulative impacts include increased public awareness, appreciation and stewardship for the Iditarod National Historic Trail, positive economic benefits accruing to communities along the Iditarod NHT, and increased participation by local rural youth on the Trail and in outdoor activities associated with trail and cabin use. Area residents and other Alaskans may experience positive economic impacts from the development of commercial trail tours. Other potential cumulative impacts include a potential

expansion of areas commonly used for harvest of subsistence resources, and access to these resources by non-area residents.

2. No Action Alternative

Potential cumulative impacts include decreasing public awareness, appreciation and stewardship of the Iditarod National Historic Trail, as the difficulty of use of remote sections, combined with increasing rural fuel costs discourage use of the trail for a range of activities by area residents. Use of the Trail by youth, and/or area residents for all activities may decrease.

V. CONSULTATION AND COORDINATION

A. Persons and Agencies Consulted

BLM Specialists, Anchorage Field Office:

Larry Beck, Environmental Protection Specialist (Hazardous and Solid Waste)
Donna Redding, Archeologist
Bruce Seppi, Biologist (Threatened and/or Endangered Species)
Geoff Beyersdorf, Natural Resource Specialist (ANILCA §810 Subsistence)
Harrison Griffin, Realty Specialist
Jeff Kowalczyk, Outdoor Recreation Planner
Douglas Ballou, Resource Group Supervisor

B. List of Preparer(s)

Kevin Keeler, Iditarod National Historic Trail Administrator, BLM Anchorage Field Office

ATTACHMENTS

1. Report of Examination For Cultural Resources
2. Threatened and/or Endangered Species Evaluation
3. Compliance w/ ANILCA Sec. 810 Evaluation and Finding

Attachment 1
**DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ANCHORAGE, ALASKA**

REPORT OF EXAMINATION FOR CULTURAL RESOURCES

1. Abstract: With the recommendation below for future monitoring, no further consultation is necessary under section 106 of the National Historic Preservation Act.

2a. Location: T. 28 S, R10 E, N1/2 sec 32; T. 18 S, R 15E, sec 36; T. 15S, 11W, sec 17 Kateel River Meridian; T 30 N, R 46 W, sec 4 Seward Meridian

USGS Quad: Ophir A-2, Medfra D-6, Norton Bay A-4, Iditarod D-4

2b. Case File # N/A (DOI-BLM-AK-A010-2010-0015-EA)

Action Type: build winter safety shelters

3. Project Description: Size: < 4 acres

The BLM proposes to build four winter safety shelters along the Iditarod trail. Shelters will be built upon cribbing boxes and no subsurface foundation posts will be used. Construction of the shelters will be done in the summer with access by helicopter. Shelters are anticipated to have only winter use with access by snowmachine, dogsled or ski-plane with the exception of the shelter located along the trail north of Egavik which may be accessed by ATV.

Topography: ridge tops or flats

Vegetation: tundra/spruce

4. Consultation Procedures: The Alaska Heritage Resources Survey (AHRs) and BLM Iditarod National Historic Trails files were checked for known cultural resources. The AFO archaeologist inspected two of these locations on the ground as well as two locations where shelters have already been completed and several locations that have since be discarded.

5. Findings: No cultural resources are known or expected for the above locations.

6. Recommendations: Although these shelters will be built and set upon cribbing boxes above the ground and will be used during the winter, it is recommended that the AFO archaeologist monitor these sites for signs of subsurface cultural resources during construction or after a period of use. While these shelter locations appear to be in low potential areas for cultural resources, there is a chance there may be small, buried short term sites in the vicinity that could be exposed after continued use.

I certify that this examination complies with pertinent historic preservation laws and regulations.

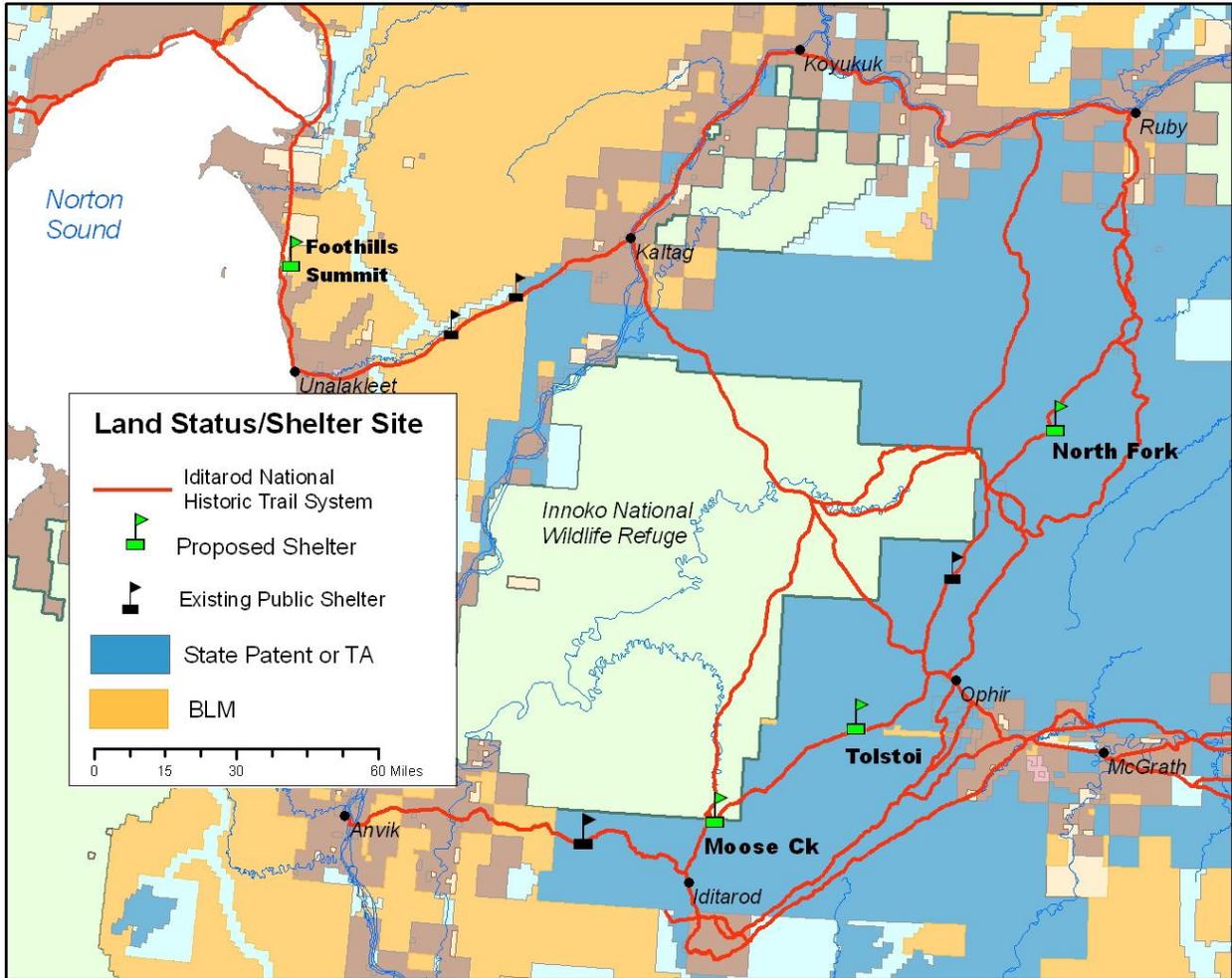
21Jan10

Date(s) of Examination

//s// Donna Redding

Archaeologist/Historian

A clear copy of (or an original of) the USGS Topographic Map of the project and the area surveyed must be attached.
AK8111-1 (April 1992)



Attachment 2

**United States Department of Interior
Bureau of Land Management
Anchorage Field Office**

Threatened and/or Endangered Species Evaluation

Casefile Number: N/A

NEPA Document Number: DOI-BLM-AK-A010-2010-0015-EA

ARRA Project LDTDF0020000

Introduction/background

The Bureau of Land Management (BLM) has proposed to construct four new winter safety shelters with cooperating partners on the Iditarod National Historic Trail (INHT) to improve public safety, support improved trail maintenance and encourage trail use, and provide economic stimulus to rural Alaska. Three of the cabins sites are located on State of Alaska owned and managed lands along the Iditarod Trail, and the fourth site is located on BLM lands along the INHT. The BLM Anchorage Field Office is the federal coordinator for implementation of the INHT Comprehensive Management Plan and is the recipient of funds for this project. For the three shelters on State lands, the shelters will be ‘owned’ by nearby local governments or community groups, under a site lease from the State. The State of Alaska is responsible for permit review and authorization of site leases and development on State lands. Only one shelter site (Foothills Summit) is located on BLM lands and would be developed and managed by BLM. The location of the proposed cabins is as follows:

Site Name	Land Ownership	Legal Description	State easement segment	Lat/Lon (WGS 84)	USGS Quad
Tolstoi Headwaters	State of Alaska	K T28S R10E Section 32	ADL 230023B Segment 1	63 00' 58.90"N 157 00' 4.04"W	Ophir A-2
Moose Creek	State of Alaska	S T30N R46W Section 4	ADL 230023B Segment 2	62 43' 12.15"N 157 55' 8.22"W	Iditarod G-4
North Fork Innoko R. Xing	State of Alaska	K T18S R15E Section 36	ADL 230023A	63 53' 5.15"N 155 51' 5.93"W	Medfra D6
Foothills Summit	BLM	K T15S R11W Section 17	not applicable	64 11' 04.26"N 160 53'54.75"W	Norton Bay

The purpose of the project is to improve public safety, support improved trail maintenance and encourage trail use. The project aims to provide local government and/or appropriate local cooperators with public safety facilities that encourage and engage volunteer maintenance and stewardship of the Trail. The project will also provide temporary income to economically distressed areas in remote rural Alaska, provide job skill development and training opportunities to residents and/or youth in such areas, and in general provide economic stimulation to the Alaskan economy.

Winter safety shelters, also known as relief cabins or safety cabins, were a common feature on Alaskan trails in the early 20th century. Between WWI and WWII the Alaska Road Commission hired local residents to build a number of safety shelters on trails that are now part of the Iditarod National Historic Trail system. Today only a few original shelters remain, yet overland inter-village travel continues to be a necessity along the Trail.

Other than expensive commercial air service, rural Alaskans in 20 communities on the Iditarod NHT have no other winter inter-village travel option than the snowmobile for shopping, visiting relatives and friends, and participating in subsistence activities. Winter users of the Iditarod NHT (from November to April) are commonly exposed to severe and even life threatening winter weather. This hazard is exacerbated by the vast and uninhabited distances found between a number of rural villages and/or existing shelters.

To meet the safety needs of Iditarod NHT trail users, the Comprehensive Management Plan for the Trail (adopted 1986) recommended the development of new safety shelters. Since that time, BLM developed four shelters on segments of the Trail crossing BLM lands, and assisted partnership projects that have developed two other shelters.

Proposed Action

The planned size for each shelter is 12'x17', including a 5 foot deck on the front of the cabin (see photo of prototype below). The walls consist of three side square 6 inch Alaskan white spruce logs. The foundation is 12"x12" treated timber post cribbing with the floor laid atop the



cribbing; no subsurface foundation posts are used. A pit privy would be installed at each safety shelter. The cabin and the privy would be separated by a minimum of 30 feet and screened by existing vegetation.

Approximately 2,500 square feet of mature vegetation would be removed for construction of the shelter and privy: the cleared shelter footprint would occupy approximately 25'x25', and the cleared privy approximately 20'x20'.

Temporary trampling and removal of small brush would occur at two other 25'x25' areas used for storage of building materials (immediately adjacent to the building site) and as the camp kitchen/tool storage area. The temporary

construction camp will consist of a covered kitchen/cook area, a wash up area, and individual tents. The vegetation in these areas would not be permanently effected.

Site access for construction could be by helicopter or by fixed wing ski plane (winter only). Treeless areas near each building site may be used for temporary helicopter landing zones (LZ's) or snow-covered tundra landings strips for fixed wing aircraft. Timber poles cut at the job site cabin site may be used as a temporary pad for the helicopter.

Shelter building materials are not being harvested on site due to the lack of adequate vegetation. Shelter materials would be transported to the building site via either cargo aircraft with skis, and/or helicopter. Approximately 7 tons of materials would be involved at each site, including approximately 72/12 foot logs, 5/17 foot beams, and a variety of other dimensional lumber and plywood. Approximately 12 loads of materials (including the previously mentioned logs) and 2-3 loads of tools and camp equipment would be transported on site, with the materials being placed within the development area for the cabin immediately next to the cabin site.

After construction, the majority of access for use would be overland via snowmachine and dogsled on the Iditarod NHT. Ski-planes may also occasionally be used to access the site after the shelters are opened to the public. Ski-plane access relies on optimal snowcover to enable safe landings and take-offs on tussock-tundra, and therefore may not occur every year.

Commercial hunting and/or guiding is not an authorized use of the shelters, however shelters are open to legal sport and subsistence hunting and trapping.

Human waste is the only type of waste projected to be generated at the site during the life of the facility. An outhouse/pit privy would be constructed in a location and manner consistent with the State of Alaska Department of Environmental Conservation requirement for no groundwater intrusion into pit privy a minimum of 4 feet below ground level.

All shelters on State lands have a minimum setback requirement of 50 feet from the mean high water of any major surface waterway (lake, stream, etc.). Additionally, pit privies are required to be a minimum of 100 linear feet from the surface water.

Food waste generated during construction, along with all other food products, are stored behind a temporary electric fence, and removed offsite when the construction camp is closed, along with all other non-burnable building materials. Remaining scrap building materials would be left for kindling.

A non-toxic, non-hazardous log oil treatment (tradename Woodguard) would be used to protect the cabin logs; between 5 and 10 gallons would be applied. Wipe up rags and personnel protection garments would be removed along with construction waste.

Small quantities of gasoline and lube oil would be used on site to power a generator or chain saws, and removed upon completion. Spill cleanup kits would be brought to the camp, consisting primarily of sorbent pads, spill absorbent material, and personnel protection. BLM

on-site staff are trained in State of Alaska spill reporting requirements and initial spill response protocol.

No aviation fuels would be stored or used at the site; helicopter refueling during materials transport to the site will occur in offsite.

No hazardous substances (per TSCA and RCRA) will be used at the site, and no hazardous wastes will be generated during construction.

A construction crew of 8 persons is proposed for construction of each cabin, not to exceed twelve persons on site. Site preparation, materials mobilization, and construction is anticipated to take between 7 and 10 days. During the life of the shelter, annual use is projected to be less than 100 persons / year.

No Action Alternative:

No shelter cabins would be constructed.

The impact of the proposed action and alternatives on threatened and endangered plants and animals and their habitats has been evaluated in accordance with the Endangered Species Act of 1973, as amended. Based on currently available information, the proposed action would not affect any threatened or endangered species or their habitats. Therefore, no consultation with the U. S. Fish and Wildlife Service is considered necessary pursuant to Section 7 of the Act and none will be undertaken.

/s/ Bruce E. Seppi
Bruce E. Seppi, Examining Wildlife Biologist

January 25, 2010
Date

Attachment 3
United States Department of Interior
Bureau of Land Management
Anchorage Field Office

COMPLIANCE WITH ANILCA SECTION 810
EVALUATION AND FINDING

NEPA Document Number: DOI-BLM-AK-A010-2010-0015-EA

Date: 01/25/10

PROPOSED ACTION:

Construct four new winter safety shelters with cooperating partners on the Iditarod National Historic Trail (INHT) to improve public safety, support improved trail maintenance and encourage trail use, and provide economic stimulus to rural Alaska. The BLM Anchorage Field Office (AFO) is the federal coordinator for implementation of the INHT Comprehensive Management Plan and is the recipient of funds for this project.

This project is a partnership project, with BLM AFO providing funding and technical support. Three shelter sites are located on State of Alaska owned and managed lands along the Iditarod Trail, and the fourth site is located on BLM lands along the INHT. For the three shelters on State lands, the shelters will be 'owned' by nearby local governments or community groups with site leases from the State. The State of Alaska is responsible for permit review and authorization of site leases and development on State lands. One shelter would be located on BLM lands north of Unalakleet, and will be managed by BLM.

Two sizes of shelters, 16'x16' and 12'x12', with two of each being built, are proposed. A pit privy would be installed at each safety shelter. The cabin and the privy are typically separated by a minimum of 30 feet and screened by existing vegetation.

Approximately 1,000 square feet of mature vegetation would be removed for construction of the shelter and privy: the cleared shelter footprint would occupy approx. 25'x25', and the cleared privy approximately 20'x20'.

EVALUATION

The lands for three of the sites for the proposed action are currently patented or Tentatively Approved by the State of Alaska. These lands do not meet the ANILCA sec 102 (3) definition of Federal Public Lands under the Federal Subsistence Program. In the case where lands remain validly selected by or are conveyed to State or Native interests the authority for subsistence and other management of fish and game resides with the Alaska Department of Fish and Game.

The proposed action also occurs on one site which is BLM managed lands and does fall under the Federal Subsistence Program. These federal lands mostly occur in areas that are fairly remote from local villages and important subsistence use areas. The most intensive subsistence hunting and fishing activity is believed to be concentrated on lands conveyed or selected by the Native Village corporations. Subsistence activities are a key factor in the selection of lands by Native individuals and corporations, and Native Allotments are typically claimed based on a family's use of a site for subsistence activities

For the shelter on BLM lands (Foothills Summit shelter) public access would primarily be during winter/snow-covered seasons via snowmachine and dogsled via the INHT. During the non-snow months

the shelter may be accessed via ATV from Shaktoolik for berry picking or hunting (approximately 15 miles distance). ATV access to the shelter from Unalakleet is not feasible without use of a boat to transport the vehicle north of the major streams separating Unalakleet and the shelter (an approximate 20 mile boat trip on Norton Sound).

Effect of proposed action on subsistence uses and needs

Fisheries:

Proposed operations for three of the cabin sites have been identified on State patented or Tentatively Approved lands. These lands do not meet the ANILCA sec 102 (3) definition of Federal Public Lands under the Federal Subsistence Program. Validly patented, conveyed, or tentatively approved lands fall under the authority of the State of Alaska for the management of fish and game.

The proposed action also occurs on one site which is BLM managed lands and does fall under the Federal Subsistence Program. These federal lands mostly occur in areas that are fairly remote from local villages and important subsistence use areas. The most intensive subsistence hunting and fishing activity is believed to be concentrated on lands conveyed or selected by the Native Village corporations. Subsistence activities are a key factor in the selection of lands by Native individuals and corporations, and Native Allotments are typically claimed based on a family's use of a site for subsistence activities

The proposed action would not significantly reduce harvestable fisheries resources that are available for subsistence use. The proposed action would not alter the distribution, migration or location of harvestable fisheries resources. The proposed action will not create any legal or physical barriers that would limit access by subsistence users of the fisheries resource.

Wildlife:

Proposed operations for three of the cabin sites have been identified on State patented or Tentatively Approved lands. These lands do not meet the ANILCA sec 102 (3) definition of Federal Public Lands under the Federal Subsistence Program. Validly patented, conveyed, or tentatively approved lands fall under the authority of the State of Alaska for the management of fish and game.

The proposed action also occurs on one site which is BLM managed lands which do fall under the Federal Subsistence Program. The proposed action of building the cabin will occur during a few weeks in the summer. A temporary base camp may disrupt some species from the area (primarily ungulates) and may attract scavengers (i.e. bear, fox, and wolverine). Cabin operations may temporarily increase human traffic into the area, and increased snowmobile and off highway vehicle traffic may temporarily shift subsistence resources away from areas customarily used by residents of the area. These impacts of increased traffic and disruption of species however, would occur only during the short time that the cabin is in use.

The proposed action would occur in areas that are fairly remote from local villages and important subsistence use areas. The most intensive subsistence activity is believed to be concentrated on lands conveyed or selected by the Native Village corporations. Subsistence activities are a key factor in the selection of lands by Native individuals and corporations, and Native Allotments are typically claimed based on a family's use of a site for subsistence activities. Most of the BLM lands in these regions is largely inaccessible and receives little consistent use by qualified Federal Subsistence users.

The Western Arctic Caribou Herd utilize forage resources and habitat on the Seward Peninsula, however, they are present on the Seward Peninsula primarily only during the winter months, and generally only in the eastern portion of the Peninsula. The Western Arctic Caribou Herd has only recently pushed its winter use area into the central portion of the Seward Peninsula. According to Dau (2007) substantially fewer caribou have wintered on the Seward Peninsula during the winters of 2003-2004 through 2006-

2007 compared to 1996-1997 through 2002-2003. The timing and use of the Seward Peninsula by caribou has substantially reduced subsistence opportunities by Shaktoolik and Unalakleet residents

Grizzly bear populations are currently being managed for population reduction and maintenance at lower levels to aid in moose recovery by decreasing potential bear predation on moose calves and decrease numbers of bear encounters with local subsistence fishing activities.

Subsistence moose hunting primarily occurs during the fall. The current Federal moose hunting regulations for this area of Unit 22A open August 1-September 30. Impacts to other wildlife populations will be minor or immeasurable.

The proposed action would not alter the distribution, migration or location of harvestable wildlife resources. The proposed action would not create any legal or physical barriers that would limit subsistence harvest and access. The impacts to subsistence resources associated with this proposed action will be negligible.

Other Resources:

The proposed action would not appreciably impact any other harvestable resources such as wood, water, berries or vegetation. Cabin construction would occur at locations away from local villages, and traditional gathering areas tend to be on Native owned and selected lands near villages.

Availability of other lands for the purpose sought to be achieved:

The proposed action includes BLM managed lands. Other lands available for the purposes proposed by the applicants are limited to BLM administered lands. Therefore, no other lands are available for these intended purposes. The BLM managed lands are distant from any village where hunting and fishing would be expected to occur. Therefore, no other lands were considered.

Other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes:

The no action alternative would require BLM to reject the permit application; however, there is no substantial evidence that would indicate a significant restriction to subsistence as a result of the proposed action.

Finding:

The proposed action will not significantly restrict subsistence uses. No reasonably foreseeable and significant decrease in the abundance of harvestable resources or in the distribution of harvestable resources, and no reasonably foreseeable limitations on harvester access have been forecasted to emerge as a function of the action that is analyzed in this document.

Prepared & Approved by: /s/ Geoff Beyersdorf, Subsistence Biologist
Name, Title

References:

Dau., J. 2007. Units 21D, 22A, 22B, 22C, 22D, 22E, 23, 24, and 26A caribou management report. Pages 174-231 in P. Harper, editor. Caribou management report of survey and inventory activities 1 July 2004-30 June 2006. Alaska Department of Fish and Game. Project 3.0. Juneau.