

**Ultra-Marathon Race in the White Mountains National Recreation Area**

**ENVIRONMENTAL ASSESSMENT**

**SPECIAL RECREATION PERMIT (SRP)**

For

Edward Plumb,  
White Mountains 100  
Fairbanks, Alaska 99709

FF1095633  
DOI-BLM-AK-02000-2010-0005-EA

Located in:  
Eastern Interior Field Office  
White Mountains National Recreation Area

Prepared by:

U. S. Department of the Interior  
Bureau of Land Management  
Eastern Interior Field Office  
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## **I. Purpose and Need**

### Purpose:

Edward Plumb has applied for a Special Recreation Permit (SRP) to hold a competitive ultra-marathon race utilizing the trails in the White Mountains National Recreation Area (WMNRA). The race would be designed to accommodate three divisions of racers which would include skiers, bicyclists, and runners. The maximum number of racers would be 50, and as an ultra-marathon, a course of approximately 100 miles is desirable.

### Need:

In order for the race to occur, developed and maintained trails capable of providing a 100-mile course are essential. Also critical to the needs of the race is a closed-loop course to both provide reasonable support and provide a zero elevation gain/loss for the participants. Areas that could accommodate checkpoints at approximately 20-mile intervals are necessary for race management and safety of the participants.

Additionally, to maximize the possibility of having weather conducive for a good race a March date was proposed. To avoid conflicting with other scheduled events, and to avoid interfering with heavy recreation use over Spring break week, March 8-12, where both the Fairbanks and Anchorage school districts and the University of Alaska have Spring break scheduled, the March 20, 21, and 22 or March 26, 27, and 28 dates would be most timely to consider.

**BLM Decision to be Made:** The BLM will make a decision whether or not to approve the SRP application. As a part of the decision the BLM will determine if the public use cabins can be utilized for race purposes, and if so, which cabin(s) would be appropriate for use. BLM will also approve the timing of the race and develop any stipulations necessary to mitigate impacts to the WMNRA and the recreating public.

## **II. Potential Issues**

**Internal Scoping:** An interdisciplinary team at the Eastern Interior Field Office met 12/2/09 to identify potential issues associated with the application. The issues identified are:

- This race could displace traditional cabin users. Though the race is not scheduled for any part of Spring Break week, general recreation use remains high during this time of year. Fewer cabins would be available for public use if the cabins are reserved for the SRP.
- The race would generate an increased level of use on the trails. The potential for user conflict along the trail system would increase. The race would also lead to possible congestion at the Wickersham Dome Trailhead due to the number of participants, especially during the start of the race.
- Health and safety concerns related to human waste could be an issue with the race. The facilities (outhouses) associated with the trail system were not designed to accommodate large groups. This could limit those facilities to the recreating public for the rest of the season.
- There are safety issues directly attributable to the race that need to be planned for and procedures developed. Some of those concerns are:
  - Traffic concerns at the trailhead and the Elliot Highway will be elevated with the addition of 50 participants and up to 15 support personnel to the regular recreation use that occurs.
  - Evacuation procedures for sick or injured participants
  - Search and rescue procedures for lost or overdue racers

External Scoping: A public scoping period was offered in order for BLM to determine issues that the public felt were important in relation to the application. The scoping period was open from 12/7/09-1/7/10. The BLM received 96 scoping comments during this time. The issues that were expressed by the public are:

- Would 50 racers, support personnel, and 10 support snow machines overload the trail system (trail crowding, firewood use, etc.)?
- Would wilderness characteristics be changed by the race?
- Would 50 racers create safety concerns on the trails? (Also, safety issues to the racers if they were not allowed to use the cabins.)
- Should the race organizers reserve and rent the cabins under the same rules that the rest of the public must follow?
- Would a precedent be set allowing races of many different types i.e. snowmachine, dog mushing etc. to take place resulting in restricting use by the general public of the White Mountain trails?
- Would potential parking concerns be eliminated by stipulating that the racers park in the overflow parking across the Elliot Highway?
- Would human waste and other debris (trash) be a concern, and if so, should the racers or event organizers be required to remove it?
- Will moose populations be stressed by the large number of racers?

### **III. Location, Land Status and Conformance with Land Use Plans**

Location: The proposed action would take place within the White Mountains National Recreation Area. The specific race route would be from the Wickersham Dome Trailhead via Trail Creek Trail, Cache Mt. Loop, Fossil Creek, Wickersham Creek Trails, and return to Wickersham Dome Trailhead. The race route would cross through the Beaver Creek Wild and Scenic River (WSR) corridor in two locations, both on the Trail Creek trail between Crowberry cabin and Cache Mt. Cabin and on the Wickersham Creek trail near Borealis Cabin.

Land Status: The Alaska National Interest Lands Conservation Act of December 2, 1980 (ANILCA, PL 96-487) classified and designated both the White Mountains National Recreation Area and Beaver Creek WSR. The White Mountains NRA encompasses nearly 1 million acres north of Fairbanks, cradled between the Steese and Elliott Highways. The trip route the applicant is selecting is all managed by BLM as part of the White Mountains NRA.

The Proposed Action conforms and is tiered to the existing land use plans (LUPs) and environmental documentation below.

- Resource Management Plan/Record of Decision for the White Mountains NRA, February 1986. Goal 3: Provide for multiple-use where compatible with primitive and semi-primitive recreation. Objective 2: Where compatible with recreation goals, permit multiple-use of resources on land classified as semi-primitive.
- Recreation Activity Management Plan for the White Mountains NRA, February 1988. Section IV.B.1 d. Commercial use: Public recreation cabins are established primarily for non-commercial recreation use. Commercial guides and outfitters may use the cabins only when the client has reserved the cabin and the guide or outfitter has the necessary commercial recreation

permit. Public-use cabins will not be available for use by commercial trappers except as a shelter in life-threatening situations.

Section IV.G.1.j. Commercial Camps and Caches: Generally commercial use of caches or spike camps will be discouraged in the river corridor. Outside the river corridor spike camps/caches will be allowed seasonally under permit.

Section IV.G.1.k. Competitive Events: Competitive events require a permit and will be assessed on a case-by-case basis to insure compatibility with the objectives of this plan.

#### **IV. Proposed Action and Alternatives**

##### Proposed Action Alternative (includes use of cabins):

The proposed action will be to conduct a three day 100-mile winter endurance race in the White Mountains NRA on March 20, 21 and 22, 2010. The race will begin and end at the Wickersham Dome Trailhead. The race route will utilize the Wickersham Creek, Trail Creek, Cache Mt. Loop, and the Fossil Creek trails. (See map of race route.) The race will begin Saturday morning at 8:00 AM and will have three categories of competitors including skiers, runners, and bicyclist. The race will be limited to 50 participants and there will be approximately 15 volunteers assisting at checkpoints and along the race route. Up to 10 snowmobiles may be used by the volunteers to support checkpoints, monitor race events, provide safety, and conduct evacuations if necessary. One snowmobile will lead the race participants for the first 20 miles to alert any trail users of the approaching racers.

Trails: Directional signs will be established just prior to the race at all trail junctions and areas in question to assist race participants in staying on course. Signs will consist mainly of arrows stapled to lathe. Shortly after the last racer has passed, a "trail sweep" will be conducted. These persons, on snowmobile, will remove all signs and litter found along the trail and help to ensure all race participants are safe. One week in advance of the race, notices will be placed at all four trailheads leading into the White Mountains NRA, informing the public of the race. The notices will include dates and times of the race and a map of the race route. During the race, all participants will be required to yield trail right-of-way to all other users or be disqualified.

Checkpoints (Cabins): Along with utilizing the developed and maintained winter trails in the White Mountains NRA, the applicant proposes to use up to three public use cabins as checkpoints. These cabins include: Cache Mt. (two nights), Windy Gap (two nights), and Borealis (two nights). A fourth checkpoint would be established near the Moose Creek Cabin using a wall tent. The Wickersham Creek Trail Shelter would also be staffed by race volunteers but not serve as an official checkpoint. Each checkpoint will be staffed by two race officials who will have a satellite phone to call in race results and provide for safety. Food and water will be available at each of the checkpoints for participants. A portable waste collections bucket will be provided at each checkpoint to be used by participants and race officials to minimize the potential over-use of the outhouses. At the end of the race all checkpoints will be left clean and at pre-race conditions, if not better. At the cabins, all stoves and lanterns will be left in working order and an ample amount of firewood left remaining. While on the trails, participants will be required to defecate well off the trail or be disqualified.

Start/Finish (Wickersham Dome Trailhead): The Wickersham Dome Trailhead will serve as the race start and finish. Carpooling or shuttle services will be provided to transport most race participants to this site. Some parking is expected across the Elliott Highway at the Alaska State DOT pull-out. The applicant will

provide highway caution signs and a crossing guard near the trailhead on Elliott Highway to provide for safety during the start of the race. Race officials plan to have a RV parked at the trailhead to support check-in and coordinate the event using satellite and cell phones. At least one portable outhouse will be staged at the trailhead for the duration of the race event.

No Cabin Alternative:

This alternative is the same as the proposed action except that there would be no use of public use cabins except in the case of an emergency. In this alternative four temporary checkpoints would be established near the locations identified in the proposed action utilizing either arctic oven or wall tents. Checkpoint sites would be located at least ¼ mile away and out of sight of any BLM public use cabin and a minimum of 25 feet away from the trail.

Weekday Alternative:

Through the public process an alternative to alter the event timing of the race in a manner that would cause less potential trail and cabin competition between the race event and the traditional users was suggested. As such, a week day alternative that would have the race starting on Sunday and ending on Tuesday has been developed. This alternative would be the same as the proposed action except for the change of start and end dates.

No Action Alternative:

The no action alternative would result in the applicant not being issued a permit to conduct a competitive race event in the White Mountains NRA.

Alternatives considered but not carried forward for analysis:

1. Utilize the Quest Trail  
This Alternative was considered but did not meet the purpose and needs of the proposed action. Specifically a closed-circuit route does not exist and the trail is not established and maintained to the degree required for the Proposed Action.
2. Utilize 42 or 57 mile trail head and trapping lines.  
This Alternative was considered but lacked specifics. Use of trapping trails would also not meet the purpose and need of providing established and maintained trails.

**V. Affected Environment**

The following elements of the human environment have been analyzed for the Proposed Action Alternative, the No Action Alternative, the Week Day Alternative, and the No Cabin Alternative. Elements that may be affected are further described in this EA.

Elements	Affected		Elements	Affected	
	Yes	No		Yes	No
Access		X	Recreation	X	
Air Quality		X	Soils		X
Areas of Critical Environmental Concern		X	Subsistence		X

Cultural Resources		X	Threatened or Endangered Species		X
Environmental Justice		X	Vegetative Resources		X
Essential Fish Habitat		X	Visual Resources		X
Farm Lands		X	Wastes, Hazardous or Solid	X	
Fire Management		X	Water Quality – Surface or Ground		X
Floodplains		X	Wetlands / Riparian Zones		X
Invasive, Nonnative Species		X	Wild and Scenic Rivers		X
Mineral Resources		X	Wilderness Characteristics	X	
Native American Religious Concerns		X	Wildlife/Aquatic		X
			Wildlife/Terrestrial	X	

Description of Elements Affected:

Recreation:

The proposed race event would be utilizing the well established designated trails, cabins, trailheads, and other facilities of the White Mountains NRA . The month of March brings the highest amount of winter recreational use including skiing, snowmobiling, dogmushing, and camping. Users are generally local and looking to take advantage of the returning daylight and warmer temperatures of spring. The White Mountains NRA offers over 200 miles of maintained winter trails, 12 public use cabins, and one shelter. Heavier trail and cabin use between highway access points and Beaver Creek can be expected, while use beyond Beaver Creek tends to not be as great and travelling conditions generally more challenging. Based on survey data, the top three experiences rated for both importance and attainment were; general nature experience, escaping crowds, and escaping personal and social pressures. Exercise-physical fitness was listed as the fifth most important recreation experience. The survey also showed that slightly over 50% of users stayed in cabins while recreating in the WMNRA at this time of year. Trail use breaks down to approximately 50 percent snowmobiling, 35 percent skiing/skijoring, and 15 percent dogmushing (Harrington/Fix, Dec. 2008). A three year historic use comparison of the three public cabins for a comparable weekend shows between 80% to 90% occupancy rates.

Hazardous & Solid Wastes:

There are no known areas of contamination.

Wilderness Characteristics:

Currently there is no designated wilderness or wilderness study areas in the White Mountains NRA. In addition, no areas are currently identified as having wilderness characteristics. All trails and areas in and around the proposed race route are open to limited winter OHV use.

Wildlife/Terrestrial:

Terrestrial wildlife and habitats are typical of Interior Alaska. The race occurs within the range of the White Mountains Caribou Herd and the historical range of the Fortymile Caribou Herd, but few caribou typically utilize the area of the race trail.

**VI. Impacts – Direct, Indirect, and Cumulative**

Hazardous and Solid Waste:

Hazardous Materials – No impacts are expected to occur.

Solid Waste

No Action:

No impacts.

All Action Alternatives:

There will be refuse generated at the checkpoints in particular.

Human Waste

No Action:

None

All Action Alternatives:

There would be some generated at the trailhead and checkpoints in particular. Some could also be expected along the race route.

Recreation:

The No Action Alternative:

The no action alternative would maintain the status quo for winter recreational use in the WMNRA. The indirect impact would be in denying many local recreational users the chance to compete in a race of this type held in Interior Alaska. Few, if any, viable options exist in Interior Alaska that could meet the requirements needed to hold this type of event.

The Proposed Action or Cabin Alternative:

Direct impacts that could occur if the race were allowed, including the use of three cabins as checkpoints are; trailhead congestion, trail use conflicts, and limitation of cabin rental opportunities. The use of the Wickersham Dome Trailhead by 50 race participants and additional support staff would easily exceed designed specifications. Use would likely spill across the Elliott Highway to a large DOT pull-out on the far side creating safety concerns crossing over the highway. Both racers and normal recreation users would find it difficult to park, unload, and get started down the trail especially during the pre-race period. Trail use conflicts could arise with the rush of 50 racers headed down the trail. Most likely, the first 20 miles or so of the race will see a fairly tight group of 50 racers moving rapidly down the Wickersham and Trail Creek trails. After 20 miles, racers will likely space out and trail conflicts should not be as numerous. The opportunity for the use of three public use cabins for a total of three weekend cabin nights and three weekday cabin nights will be lost for public (non race participant) reservation. This represents a

loss of one-quarter of the potential available cabins for two nights. It is possible as many as six groups could be affected by this loss of cabins either causing them to change plans or forego a trip to the White Mountain NRA.

Indirect impacts could include users altering trip plans to the WMNRA or not meeting desired expectations or experiences. Typical users to the White Mountains this time of year may choose to either not go or pick alternative trip options to avoid the race event. Other users, especially if travelling “clockwise or against the grain”, may encounter many more users or groups than anticipated. This could lead to a loss of the natural setting or even frustration in sharing the trail.

Cumulative impacts could include increased trash and human waste along the trail system, over-use of facilities such as cabins and outhouses, and a further reduction in available firewood wood supplies near cabins. In allowing this race to be held, increased interest in future races of various types could occur.

#### Week Day Alternative:

Impacts of the Week Day Alternative would be similar to the Proposed Alternative except a reduction in trailhead congestion, trail conflict, and potential cabin displacement would be expected. By moving the race from a Saturday race start to a Sunday race start, most recreationists will be departing the trailhead verses arriving, reducing congestion. Not having race participants out on the trail on Saturday but on a weekday should also reduce the potential for trail conflict to occur. The probability of displacing other potential recreational cabin users would also drop significantly by nearly 30%, from roughly 78% to 50%.

#### The No Cabin Alternative:

Impacts from the No Cabin Alternative would be the same as the Proposed Action with the exception of impacts on cabins becoming impacts on temporary checkpoint sites. Under this alternative no impacts would be expected at cabins within the White Mountains NRA. Instead impacts would occur where temporary checkpoints are established. Direct impacts may include the trampling of local sites, and increased likelihood of trash and human waste accumulating. Additional effort would be required for race officials to transport infrastructure to establish these checkpoints. Additional trips would lead to increased trail use.

#### Wilderness Characteristics:

The No Action Alternative:

None

#### All Action Alternatives:

No impacts are expected due to the entire area being open to motorized use.

#### Wildlife, Terrestrial:

In both action alternatives, there will be an increase in human activity along the trail route during the race relative to the no-action alternative. This will result in disturbance of some wildlife species such as moose and caribou that may happen to be on or adjacent to the trail and may result in some short-term and short-distance avoidance of the area of the trail. Because racers will travel only on the trail, such disturbance of wildlife is expected to be very minor.

## **Mitigating Measures for Proposed Alternative**

### Hazardous and Solid Waste:

No Action Alternative:

None

### All Action Alternatives:

Mitigation measures for human waste and removing other refuse are built into the proposed action. These mitigation measures include portable human waste buckets at checkpoints and policing the trail and checkpoints of any trash.

### Recreation:

The No Action Alternative:

None

### The Proposed Action or Cabin Alternative:

Trailhead congestion will be greatest during the race start. Setting an early race start earlier than typical users arrive would do a lot to alleviate conflicts. General activity at the trailhead usually begins between 9 and 10 AM. Parking space will also be a premium. Requirements to park across the highway in a large Alaska DOT pull-out area would work well. Traffic control for people crossing the highway would be well advised. The applicant has also suggested they will attempt to carpool or shuttle as much as possible from Fox.

The majority of the trail conflict potential will be during the roughly first 20 miles of the race where racers are still fairly tightly bunched. Trail usage on this first 20 miles is also generally higher than trail usage as you travel further out into the White Mountains. By having an early race start before other users are on the trail will do much to alleviate trail conflict. A lead snowmobile, alerting any on coming trail user to the race, would also help reduce the chance of trail conflict. Posting race information notifying other potential trail users of the race time and where and when racers would be expected would reduce unexpected trail encounters. Both race participants and officials should yield trail right-of-way to other users when encountered.

To maximize opportunities for non-race recreational cabin users, only the minimum number of cabins will be made available for the race. These cabins will be Cache Mt. Saturday night and Windy Gap and Borealis for Saturday and Sunday nights. Any cabins utilized by the race as checkpoints should be left fully functional. Adequate supplies of stove and lantern fuel should be left along with an ample supply of firewood after the race. Firewood harvest sites for each of the three cabins will be identified. These sites will be between ½ of a mile and 2 miles from the cabins and will be located to maintain future firewood supplies for recreational users. The race applicant will be responsible for correcting any damages that may occur to the cabins while being utilized as checkpoints.

Trail sweeps should follow the last racer to remove any temporary race signs and trash. Trail clean-up should occur no later than 12 hours after the last race participant has passed by.

To mitigate usage of the one outhouse located at Wickersham Dome Trailhead, the applicant may be required to provide at least one portable toilet at that site. To also alleviate additional use of outhouses at checkpoints, the applicant should be required to provide alternative human waste collection devices and to back-haul all waste generated at these sites.

Future applications for competitive events will continue to be assessed on a case-by-case basis.

Week day Alternative:

Mitigation for the Week Day Alternative would be the same as the Proposed Action Alternative except that the night specifics would be different, See above.

The No Cabin Alternative:

Mitigation for the No Cabin Alternative would be the same as the Proposed Alternative except the same cabin standards would be applied to designated temporary checkpoint sites

Wilderness Characteristics:

The No Action Alternative:

None

All Action Alternatives:

None

Residual Impacts:

The Proposed Action represents short-term use of the White Mountains NRA No permanent development is anticipated that would interfere with the recreation designation, and no long-term resource commitments would be made. No irreversible and/or irretrievable commitments of resources are identified as a result of proceeding under the Proposed Action or any of the alternatives. It is likely this event will increase future public awareness of the White Mountain NRA and increased use. Increased use could begin to stress current infrastructure in the NRA but also provide positive economic benefits for local businesses.

Hazardous and Solid Waste:

Residual impacts may remain after the implementation of mitigation measures, such as petroleum products not cleaned up after overfilling and improper disposal of human and solid waste.

## **VII. Consultation and Coordination:**

### Persons/Agencies Consulted

Edward Plumb          Applicant

Jim Herriges	Wildlife Biologist	Invasive, Nonnative Species, Vegetation, Threatened/Endangered Species, Subsistence, Wildlife/Terrestrial	BLM BLM
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Tyler Cole	Mining Compliance Spec.	Mineral Resources	BLM
Jason Post	Fisheries Biologist	Essential Fish Habitat, Wildlife/Aquatic	BLM
Holli McClain	Outdoor Recreation Planner	Visual Resources	BLM
Robin Mills	Archeologist	Cultural Resources, Native American Religious Concerns	BLM
Skip Theisen	Fire Management Specialist	Fire Management	BLM
Nancy/Vic?	Realty Specialist	Lands	BLM
Ben Kennedy	Hydrologist	Air Quality, Floodplains, Water Quality, Wetlands/Riparian, Soils	BLM
Collin Cogley	Outdoor Recreation Planner	Areas of Critical Environmental Concern, Environmental Justice, Farm Lands, Wilderness, Recreation, Wild and Scenic Rivers	BLM
Rebecca Hile	Physical Scientist	Wastes, Hazardous or Solid	BLM

List of Attachments

Attachment A	Stipulations Generated by Environmental Assessment (1 pp)
Attachment B	Assessment of Archeological, Historical, and Paleontological Resources (2 pp)
Attachment C	Compliance with ANILCA Section 810 Evaluation and Findings (1 pp)

/s/ Collin Cogley

1/25/2010

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Preparer's Signature  
Collin Cogley  
Outdoor Recreation Planner

Date