

# Carbon River Access Management Environmental Assessment Public Comment Summary

## Public Participation

Public involvement is a key component of the NEPA process. In this part of the process, the general public, federal, state, local agencies and organizations are provided an opportunity to identify concerns and issues regarding the potential effects of proposed federal actions. This opportunity to provide input is called “scoping.”

Internal scoping began formally in November 2006 following major flood damage that occurred along the Carbon River Road and throughout Mount Rainier National Park. During these internal meetings, a variety of possible management action responses were presented and discussed, including concerns and issues from park staff in vegetation, wildlife, maintenance, water resources and planning about the potential effects of those actions. Internal scoping was also used to engage professional staff from other National Park Service (NPS) offices and other agencies such as the Federal Highway Administration and the U.S. Fish and Wildlife Service to provide information regarding possible management actions, including the preliminary conceptual alternatives that may affect park resources.

Initial public comments were brought forth at a series of public meetings held in the vicinity of the park to discuss the temporary closure of the park, flood impacts and recovery following the November 2006 floods. These meetings included Enumclaw (November 16, 2006), Eatonville (November 16, 2006), and Packwood (November 20, 2006).

The park’s General Management Plan (GMP) directs that the Carbon River Road be closed after the next major washout and converted to a hiking and bicycling trail. By April 2007 it was clear that an Environmental Assessment (EA) was necessary to implement the GMP direction for the Carbon River area and a planning team was identified to manage the EA process. Comments continued to be solicited formally and informally from park and federal highways planning team members and from other agency staff. Internal scoping is ongoing and will continue throughout the development of the Environmental Assessment.

In the summer of 2008 the NPS conducted two formal public scoping meetings to solicit public comments and other relevant information about the Carbon River area. This public scoping was identified as a key step in the process to develop alternatives for the Environmental Assessment. The planning team developed and presented three “*preliminary conceptual alternatives*” at these meetings to establish a starting point for the discussion and to stimulate public comment. Information gained from public comments on the three preliminary alternatives was used to formulate the alternatives that will be carried forth for analysis in the Environmental Assessment.

The public scoping meetings were publicized through the following means: 1) a press release describing the intent to reinstate the public involvement process through comments on the proposed preliminary conceptual alternatives was issued on June 23, 2008; and 2) it was announced via the park’s Planning website (<http://www.nps.gov/mora/parkmgmt/planning.htm>) and the NPS Planning Environment and Public Comment (PEPC) planning website (<http://parkplanning.nps.gov/mora>) on the same day.

The objectives of the public scoping included:

- Invite participation from federal, tribal, state, local governments and other interested parties;
- Inform all interested parties about the scope of the problem and the need to find solutions;
- Revise the preliminary range of management alternatives (in addition to a no-action alternative that will be used as a baseline of existing conditions from which to evaluate proposed changes in management);
- Identify substantive environmental (including natural, cultural, recreational and socioeconomic) issues which warrant detailed environmental impact analysis, and eliminate issues or topics which do not require analysis;
- Identify potential environmental consequences and suitable mitigation strategies.

The public outreach called for by Section 106 of the National Historic Preservation Act (NHPA) was integrated into the NEPA process in accordance with the NPS Programmatic Agreement with the Conference of State Historic Preservation Officers and National Park Service Management Policies (2006).

The formal public scoping period for the *Carbon River Area Interim Management Plan* began on June 23, 2008 and ended on July 30, 2008. During this time, Mount Rainier National Park held two open house public meetings in Enumclaw (June 30, 2008), and Tacoma (July 1, 2008). All parties wishing to express concerns or provide information about management issues to be addressed in the forthcoming conservation planning and environmental impact analysis process and/or to comment on the preliminary management alternatives were strongly encouraged to submit written comments.

Professional staff was available to introduce the project, give presentations, answer questions, and to accept comments. The public was encouraged to provide comments during the meetings and/or to submit written comments. The meetings were attended by approximately 47 people. There were 43 comments made at the Enumclaw Public Meeting by 17 people who signed in or were counted and 82 comments made at the Tacoma Public Meeting by 30 people who signed in or were counted. Approximately 125 total comments were recorded on flip charts at the meetings.

Altogether 121 people participated in the public scoping comment process for the Carbon River Road, including public meeting participants and those who submitted written comments (not including duplicate comments or those who attended both a public meeting and submitted written comments). Of the 47 people who attended public meetings in Enumclaw or Tacoma, only seven submitted separate written comments.

In addition to public meeting participation, there were 80 public comment letters received: 76 from individuals, 3 (1 duplicate) from non-profit organizations (National Parks Conservation Association, Washington Trails Association), and one from a business (Tacoma News Tribune). Comment letters were received via the PEPC website (23 letters), U.S. mail (11), and/or email (38) and optional public comment forms (4). One comment was also recorded as a telephone message. Several were received both via email and U.S. mail and/or received via U.S. mail and fax. Four written visitor comments about the area received after public scoping had formally closed have also been included. Altogether, these public comment letters included approximately 450 individual comments.

Comments were submitted directly to the park at the following address: Mount Rainier National Park 55210 238th Avenue East, Ashford, Washington 98304. Comments were also submitted via the PEPC website at <http://parkplanning.nps.gov/mora> or sent via e-mail to the superintendent, project manager ([mora\\_superintendent@nps.gov](mailto:mora_superintendent@nps.gov) or [mora\\_carbon\\_river\\_comments@nps.gov](mailto:mora_carbon_river_comments@nps.gov)).

Information about the planning process was periodically updated and posted on the park's website: <http://www.nps.gov/mora/parkmgmt/planning.htm> and on PEPC.

## Summary of Concern Statements

The public comments from both the meetings and the letters (575) were sorted into 43 different categories, including a variety of subcategories. These ultimately resulted (from additional sorting and combining) in the 160 concern statements listed below plus the ones listed in the lower section that were *considered but dismissed* (19), or *outside the scope* (8) of the proposed plan. Based on the public comments, the planning team developed approximately 63 questions to determine whether and/or how to modify the preliminary alternatives. The comments have become part of the public record.

Public comments during the General Management Plan, a previous environmental analysis process that considered the future of the Carbon River Road, were diverse but were nearly evenly split 50:50, ranging from a strong desire to see the Carbon River Road fully open with access along its entire length to recommendations advocating permanent closure of the road to motorized vehicles (NPS 2002).

Public comments during this process (based only on written comments) were more uneven (nearly 2:1 against closure). Approximately 45 individuals requested that the park reconsider closure, 23 agreed with closure, and seven desired access as far as possible (most referring to Chenuis as part of Preliminary Conceptual Alternative 3a). Five written public comments did not address whether or not the road should be closed.

## 1. Issues and Concerns to be Addressed in the Environmental Assessment

All of the above issues and concerns will be considered and/or addressed in the Environmental Assessment except for those identified under the next heading: *Issues and Concerns Not Addressed in this Document*. Many comments simply agreed or disagreed with the preliminary proposals and are not recounted here. Rather, substantive comments that requested changes or identified impacts or pointed out key information are included and listed below. (*Note: The number of comments listed is not the same as the number of individuals who commented. More than one comment on a particular topic may be made by an individual in the same letter.*)

### Differential Treatment of Park Entrances (6 comments)

- The proposed alternatives treat the Carbon River Road / area differently than other park roads / areas affected by flooding in 2006.
- Modify the river channel and reconstruct the dikes along the road as was done at Longmire.

### Process (38 comments)

- Proposed actions in Alternative 3 may warrant an EIS due to impacts to threatened and endangered species and wilderness impacts.
- Describe the decision process the park used to not consider reopening the road beyond Chenuis.
- Public feedback is limited by local participation in the process and the limited range of alternatives.
- The GMP can be modified.
- The goal is poorly defined and subjective. It should encompass access to Ipsut Creek and the Carbon Glacier.
- An unambiguous and measurable definition of the term "major washout" in the 1999 GMP should be developed as part of this process.

- Post the Western Federal Lands Highway Program Damage Survey Assessment on the website.
- Additional expertise should be sought from among park staff and other experts to determine how to fix the road.

#### Range of Alternatives (33 comments)

- The range of alternatives allows reasonable access to the Carbon Glacier.
- The range of alternatives should be focused on methods of closure instead of extensive construction or maintenance of area facilities.
- The range of alternatives is too narrow because it is derived from the park's perceived list of constraints. Only Alternative 3 has road access.
- The alternatives all limit public access to the Carbon Glacier, especially for children and the elderly.

#### Funding (11 comments)

(These comments are reported in other categories – see *Preliminary Conceptual Alternatives, Facilities and Impacts –Socioeconomics.*)

#### Boundary Expansion (12 comments)

- Boundary expansion facilities would not provide visitors access to the resources in the Carbon River area.
- A “replacement” campground in the boundary expansion area will provide a completely different experience and does not provide access to the Carbon River area.

#### Facilities (27 comments)

- Retain toilets, picnicking and water system if Ipsut is closed.
- Concrete, steel and other infrastructure (fire grates, picnic tables, small buildings) should be removed from Ipsut Creek by creating temporary access.
- Ipsut Creek Patrol Cabin should be used in a future campground as an interpretive museum or returned to Ipsut Creek Campground on high ground and a high foundation.
- Reconstruct the Carbon River Entrance Arch.
- Get the Ipsut Creek infrastructure out of the valley.
- The Ipsut Creek Patrol Cabin should remain a “backcountry” structure.

#### Partnerships (3 comments)

- Consider partnerships with state and local governments, private landowners and the Clearwater wilderness to identify opportunities for visitor use no longer available at the entrance.

#### Parking (15 comments)

- All of the proposed alternatives would have very limited parking.
- Additional parking will be needed at the Carbon River Entrance in all alternatives.
- Consider shuttles to other parking areas.
- Develop an estimate of parking spaces under each alternative.
- Agreements will be needed with other agencies / organizations / individuals to accommodate parking.
- Expanded parking at or near Chenuis (Preliminary Conceptual Alternative 3) would not come close to replacing that at Ipsut.

#### Suggested Alternative Components (32 comments)

(See also *Motorized Access*, *Wilderness Boundary modification* in the section below and *Bicycle Access*, and *Camping: Frontcountry* and *Backcountry* in this section.)

*Replacement visitor use opportunities*

- Substitute opportunities for those lost at Carbon River should be created, including easy access to the snout of a glacier.
- New visitor use opportunities should be created at or near the Carbon River Entrance for those (children, elderly) now unable to access Carbon area trails.

*Interpretation*

- Interpret the difficulty in maintaining the road.

*Restoration*

- Allow for recovery and/or restore the road or portions of the road to pre-road conditions.

New Alternatives (not among the preliminary mix) (82 comments) (see also *Shuttle Access*)

*Modified Road Access*

- Keep the first mile of road open (to the Old Mine Trailhead) as a vehicle drop-off / turnaround and to allow non-hikers to experience the temperate rainforest.
- Instead of terminating the road near Chenuis, reconstruct the road to a turnaround before the Ipsut Creek Bridge.
- Reopen the road through the washouts as one-lane with minimal regrading.

*Road Reconstruction*

- Reconstruct /re-engineer the road with robust, reinforced structures, such as using large boulders as the base material for the road.
- Rebuild the road to Ipsut Creek Campground to allow continued day hiking access to the Carbon Glacier.
- Restore the road to its historic terminus at Ipsut Creek.
- Reconstruct the road as a one lane road with turnouts for public or shuttle access.
- Preserve the opportunity for day hiking on and access to Carbon River area trails by providing some road access.
- Regrade and open the road.
- Piece together the road and give it one more shot at staying put.

Affected Environment – Water Resources (3 comments)

- Evidence for the increasing frequency and magnitude of flooding is based on a stream gauge downstream of not only the Carbon River, but also Chenuis, Ranger, Cayada, Poch and Evans Creeks.
- Flooding on the Carbon River occurs in some form about once every three years.
- The Carbon River is a braided system because of the combination of the low-gradient valley and enormous sediment inputs from the loose volcanic and glacial deposits within the park. The river also moves vertically, and the elevation of the bottom has increasing aggradation. Because the sediment inputs are not controllable, threats to park infrastructure will increase.

Affected Environment – National Historic Landmark District (3 comments)

(see *Alternative Components – Interpretation and Education*)

Affected Environment – Park Operations (7 comments) (see *Impacts – Park Operations* below)

(see *Impacts – Park Operations* below)

Affected Environment – Visitor Experience (19 comments)

- The Wilkeson Arch says “Gateway to the Carbon Glacier.”
- The Carbon River Road provides the only four-season access to the park. When it is open, it is snow-free most of the winter.
- Ipsut Creek Campground is/was the only four-season campground in the park.
- The Carbon River Road is the only means to allow the average visitor day hiking access to one of the park’s most significant features, the lowest glacier in the continental U.S.

Impacts – NHLD (2 comments)

Impacts – Park Operations (29 comments)

- Constructing a new wilderness trail at a higher elevation will be expensive and difficult, given the length, grade and streams / wetlands.
- Reducing public access to the Carbon River area will reduce management needs.
- Over time, there has been a systematic loss of infrastructure and operations from the Carbon River area (housing, phone, interpretive programs, potable water, etc.).
- The extent of flood damage can be attributed to the lack of robust repair following the 1996 flooding.
- Closure of the road will result in more difficult trail maintenance because fewer visitors will be able to use them when the additional distance as a result of closure is added (3.6 miles to Chenuis Trailhead, 3.1 miles to Green Lake Trailhead, five miles to Ipsut Trailhead).
- Regardless of the alternative selected, the Carbon River will continue to have long-term impacts to facilities.
- Little preventative maintenance has been done on the Carbon River Road.
- Reduced access to the Carbon River area will result in more people going to other park areas, including the already overcrowded Mowich Lake, Paradise and Sunrise.
- What actions will the park take to limit overcrowding at Mowich Lake?

Impacts – Socioeconomics (8 comments)

- Reconstruction of the road is unsustainable.
- Repair the road, regardless of cost.

Impacts –Threatened and Endangered Species (7 comments)

- Overlapping key nesting / spawning seasons for fish and owls will impede proposed construction or reconstruction activities.
- Endangered species, including northern spotted owls and bull trout, have coexisted with the road for many decades, including through floods and subsequent repairs.
- What happened to the pair of owls that used to be near Falls Creek?
- Alternative 1 (No Action) would have the fewest impacts on threatened and endangered species.

Impacts – Vegetation (2 comments)

- Mowich and Spray Park have already been documented as over-used and will become more so with spillover use from the Carbon River area.
- Restoration of the road to Ipsut Creek would result in the loss of many trees.

Impacts – Visitor Experience (135 comments)

*Change in Type / Number of Visitors*

- Without vehicle access, the average visitor, families, the elderly and children cannot day hike to or experience the Carbon Glacier or access the park's only low elevation, year-round campground.
- Reduced or closed access will affect the approximately one-fourth of park visitors who use these entrances.
- Although the demand for access is increasing, reduced or closed visitor access is being proposed.
- Reduced and limited opportunities for schoolchildren will occur with the closure of the road and lack of day hiking access to the Carbon Glacier.
- The general public (young, old, poorly conditioned, uninformed) do not have enough stamina to bicycle or hike to the Ipsut Creek Trailhead and then continue on a day hike to the glacier or elsewhere.
- Individuals with limited mobility cannot access Ipsut Creek campground or experience the area except for the Rainforest Loop Trail.

#### *Change in Type / Number of Vehicles*

- Road closure or partial closure will dramatically reduce the type and number of visitors able to access the Carbon River area.

#### *Reduced Environmental Impacts*

- Road closure or partial closure will reduce environmental impacts associated with vehicles.

#### *Lengthier Trips*

- With road closure, many formerly popular day hikes (including to the Carbon Glacier) will be too far for many visitors to access (only Chenuis Falls and possibly the Green Lake Trail are day hikes with the road closed).
- Road closure has turned many former day hikes into weekend trips (Carbon Glacier, Dick Creek, Moraine Park, Seattle Park, Yellowstone Cliffs, Windy Gap, Moraine Meadows, Curtis Ridge, Mystic Lake, Elysian Fields) and former weekend trips now have an additional 10 miles.
- Previously simple day hikes that anyone could do at any time are now days-long, permit-controlled expeditions that must be planned in advance.
- Ease of access is not replaced by allowing bicycles.

#### *Wonderland Trail Circumnavigation Hikes*

- Access to and food supply drops for Wonderland Trail hikers will be limited / more difficult.
- Without the Carbon River drop site, more supplies would have to be provided at Mowich or Sunrise.

#### *Change in Visitor Experience*

- More visitors will walk rather than drive in the rainforest.
- The experience of hiking a road is vastly different from hiking a trail.
- The focus of the Carbon River area will change from experiencing the rainforest and subalpine areas to experiencing only rainforest along a road.
- If the campground is later replaced in the boundary expansion area, camping will change from within an old growth forest to within an open second growth forest next to a road.
- Closure of the road will result in fewer, longer visits.

#### *Cumulative Effects*

- Even with possible restoration of the road, the road will continue to retain road characteristics, similar to the North Puyallup Trail (Klapatche Point to North Puyallup Trail), where the road has been closed for three decades.
- Loss of easy visitor access on the Carbon River Road exacerbates the loss of day hiking opportunities in other areas of the park, including on the Westside Road.
- Loss of Ipsut Creek Campground means that year-round access to camping in Mount Rainier is gone (adding to the loss of Tahoma Creek Campground and Sunshine Point Campground).

Impacts – Water Resources (7 comments)

- Aggradation will continue to increase the magnitude of 100-year floods.
- There will be impacts on water resources (wetlands / numerous stream crossings) from the establishment of the wilderness trail.
- The wilderness trail will require extensive puncheon / boardwalk that will be expensive to maintain.
- The area just outside the Carbon River Entrance is likely be affected by flooding soon.

Impacts – Wilderness (25 comments)

*Regarding Alternatives*

- Constructing a new trail in wilderness will require blasting and the use of power equipment.
- There is little room to allow for parking between the road and the wilderness boundary in Preliminary Conceptual Alternative 3.
- A new trail in wilderness will be expensive in both dollars and loss of habitat.
- Superlative access to wilderness, into areas such as the Carbon River valley, set Mount Rainier apart from other areas with thousands of acres of wilderness.
- The Carbon River area wilderness boundary (100 feet from the centerline of this unpaved road) was set along with those in other Washington State national parks, without consideration for changes that might be needed in the future.
- Closure of the road will result in *de facto* wilderness closer to an urban / suburban population.

*Note: Although not substantive, the comment numbers for the three alternatives below include those who agreed or disagreed with the alternative concept.*

Preliminary Conceptual Alternative 1 (24 comments)

- Add a wilderness hiking trail to this alternative.
- This alternative would be the least costly.
- Maintain a hiking and biking trail in the corridor as a wilderness trail is developed.
- Portions of the washout may be attributed, in part, to the lack of maintenance on the road (such as plugged culverts).
- This alternative will allow money and resources to be shifted to higher priority projects in other areas.

Preliminary Conceptual Alternative 2 (40 comments)

- Keeping a road / bike path graded in this alternative would be beyond the ability of a trail crew working only with hand tools.
- This alternative would be more permanent and less expensive than Preliminary Conceptual Alternative 3.
- Closure of the road may diminish both park and public support for facilities in the area.
- Converting the road to a hike and bike trail would refocus the visitor experience on the unique Carbon River area temperate rainforest.

- Over time, the road will close in and feel more like a trail.
- Without a significant, continuing investment, the ability of the trail crew to maintain the road for even hiking and bicycling with hand tools will not be feasible. Heavy equipment access is needed.

Preliminary Conceptual Alternative 3 (53 comments)

- Retain / modify this alternative to allow for long-term bicycle access.
- This alternative is the most expensive in actual and resource costs.
- This alternative would have high costs both for road reconstruction and for wilderness trail construction.
- This alternative may not be feasible given the repeated washouts at Falls Creek.
- This alternative needs reconstruction of the dikes to retain road access.
- Only this alternative results in reopening of (at least) a portion of the road.
- This alternative would provide the most public access.
- Although this alternative adds three to four miles to the roundtrip Carbon Glacier hike, at least it would make it possible for many hikers.
- Although it adds three to four miles to each roundtrip, only this alternative retains the possibility of several of the day hikes available from the Ipsut Creek Trailhead.
- The wilderness trail will be problematic given the length, grade (landslide probability) and streams (wetlands).
- There is no “high terrace” outside the road corridor for the wilderness trail.
- Identify the new “loop” trail opportunities.
- This alternative only delays the inevitable by repairing damaged sections in areas that historically flood and wash out.

Modified Alternative Components (11 comments)

- Combine the road corridor hike and bike trail option with a new wilderness trail.
- Allow the road corridor to be used long-term for bicycling.
- Maintain an informal trail as the wilderness trail is constructed.
- Allow for an unimproved trail along with a formal trail in the road corridor.
- Consider a wilderness trail separately.
- The alternatives should allow reconstruction of the road beyond Chenuis.
- The one lane sections of roadway should only be in washouts – otherwise, the road should be retained in its historic width of two lanes.
- Retain bicycle access and camping at Ipsut Creek.

Bicycle Access (22 comments)

- Maintain bicycle access in all alternatives.
- Bicyclists would be excluded in PC Alternative 3.
- The rails to trails bike path is planned to the park boundary in the Carbon River area. The alternatives should allow for it to be retained.
- Without bicycle access in a closed road scenario, visitor numbers and opportunities would be greatly reduced.
- Identify current bicycle use statistics.
- Provide bike racks at Ipsut Creek.
- Access along the road should not be only for mountain bikes.

Camping: Backcountry (8 comments)

- Improve primitive camping opportunities at Ipsut Creek for bicyclists, beginner backpackers, and as a base camp for groups.
- Establish additional backcountry camps along the road.
- Retain Ipsut Creek as a hiker / biker campground.
- There are few suitable replacement locations for the backcountry camp (Preliminary Conceptual Alternative 3).
- Identify the facilities that would be available at a hike and bike camp.
- Replacing Ipsut Creek with a backcountry camp in another location is unnecessary unless that camp is lost.

#### Camping: Frontcountry (20 comments)

- Provide camping opportunities in all three alternatives.
- Retain Ipsut Creek Campground.
- Fully repair the road to the campground.

#### Sustainability (13 comments)

- Preliminary Conceptual Alternative 2 is more sustainable than Preliminary Conceptual Alternative 3.
- Exercise fiscal responsibility in determining whether to fix the road.
- The amount of money spent should be relative to the expected longevity of the fix.
- Financial and resource costs to rebuild the road may be too high.

#### Shuttle Access (9 comments)

- Consider shuttle access as far as possible up the Carbon River Road as called for by the GMP.
- Consider an alternative fuel concession shuttle.
- Avoid the additional expense of shuttle access.
- Sustainability has proven to be short-term with the Carbon River Road.

#### Global Climate Change (1 comment)

- Global warming may cause accelerated melting of the Carbon Glacier.

#### Acknowledgement of Constraints (Engineering, Geology, Flooding, Politics, Threatened and Endangered Species, Wilderness) (31 comments)

- Phasing out vehicle use may delay the inevitable closing of the road for a time.
- Despite the likelihood of future damage from flooding, maintaining access should occur.
- Floods will continue, sediment will shift and facilities will be damaged.
- No doubt costs to re-engineer the road are near prohibitive.

#### **Issues and Concerns Considered But Dismissed**

The following issues were initially considered by the planning team, but were eventually rejected for various reasons. Several of these issues will be part of future planning documents (including implementation of the boundary expansion when that occurs). Some will be acknowledged as the long-term goal for the Carbon River area, but cannot be addressed within the proposed Environmental Assessment because the park cannot initiate planning for unacquired boundary expansion lands it does not own. Reasoning for dismissing other concerns has been developed, and will be included as part of the Environmental Assessment.

#### Allow the public to use electric bikes, motor bikes, scooters, and all terrain vehicles (ATVs) on the Carbon River Road.

### Camping: Frontcountry

- Establish car camping at the new road terminus (either at the entrance or near Chenuis Falls).
- Add a campground at the Carbon River Entrance – the proposed boundary expansion camping area at the Thompson property is too far.
- Identify what facilities will be available in the boundary expansion camping area.
- Consider a campground at Hucklechuck / Thompson property.
- Work with the USFS to establish a campground across the Copley Lake Bridge (near the Carbon River Entrance).
- There would be few places to go from the proposed boundary expansion area campground.

### Road Reconstruction Options

- Reconstruct the road by placing a berm between the river channel and the road.
- Incrementally raise sections of road over time.
- Construct an Arizona crossing in the Falls Creek area to allow water to flow over the road.
- Locate bridges across the washouts.

### Modify the Wilderness Boundary / Add new designated wilderness elsewhere to reconstruct the Carbon River Road and/or to allow for long-term bicycle access.

Although many commenters requested a change in the wilderness boundary and suggested that the current boundary was not intended to deny general visitors road access to the Carbon River area, park staff cannot advocate a wilderness boundary change in the absence of an amendment to the existing GMP or a new GMP.

### Consider a road on the north side of the Carbon River

This option, which was addressed obliquely in the GMP has now been considered but rejected. During initial planning, it was rejected because it would have involved the construction of approximately two miles of new trail and because the GMP stated that it was not feasible. The GMP reasoning (in the public comments section), however, was that the Copley Lake Bridge was unavailable. That bridge was reconstructed in 2003.

During the current planning process, when PC Alt. 3b was added it proposed between five and eight miles of new trail. As a result the north side road / trail option was reconsidered. Further investigation, however, found that it would not allow an improved level of road access into the Carbon River area (the road on the north side would need to terminate in the vicinity of Chenuis Falls).

When the Clearwater Wilderness was designated by the U.S. Forest Service (USFS), the Old Chenuis Creek Road (Forest Road 7840) was identified for closure. The northwest park boundary near the head of Chenuis Creek has not been accessible by vehicle since the designation of the Clearwater Wilderness. Forest Road 7810 Road (Copley Lake Road) has been open to its end since the Copley Lake Bridge across the Carbon River was replaced. Although it is possible that the Mount Baker – Snoqualmie National Forest could reconsider providing additional road access to the Carbon River area, they would need to reverse previous decision-making about the area.

### Seek public funding to restore public road access to Ipsut Creek Campground.

Although individuals or a park authorized non-profit friends group could seek funding for reconstructing the road, park staff cannot orchestrate such an endeavor. The November 2006 flood has been identified as the major washout triggering the GMP direction to close the Carbon

River Road. The Environmental Assessment is the proposed plan that would implement this decision.

Reroute the Carbon River Road away from the river / Reroute flood-prone sections of the Carbon River Road.

The road cannot effectively be rerouted unless it is rerouted within wilderness (see *Modify the wilderness boundary* above). Other reroutes would be too close to the current alignment and would therefore have a high cost and low benefit.

Provide vehicles on the other side of the washouts to facilitate access.

A vehicle would need gas regularly and getting the gas in would take a major effort (i.e., getting four or five five-gallon cans back and forth). The vehicle would also periodically need maintenance and this would require flying one in and out on an uncertain schedule. The gain would not be worth the cost and scheduling regular runs would be difficult.

Open the first mile of the road (up to the Old Mine Trailhead) to allow for parking

## **2. Issues and Concerns NOT Addressed in the Environmental Assessment**

The following issues generated through public scoping are not within the scope of this project and are therefore not analyzed in detail in the document:

- Preserve a section of historic road and acknowledge its significance on the ground and in an interpretive display in the new boundary expansion visitor center.

Actions linked to the proposed boundary expansion area near Carbon River are considered to be outside the scope of the current plan because although some of these lands are owned by public and/or non-profit land protection organizations, the NPS has not yet received funding to purchase them.

- The NPS must face the daunting challenge of what to do about glacial rivers washing out roads. The West Side Road and the Carbon River Road are just the beginning. Will the NPS also close Highway 410 and the White River Road?

There were several comments about the proximity of other roads within Mount Rainier National Park being in the floodplain. While 2006 flooding did affect these roads, separate planning processes were undergone or are currently taking place for them.

- Fix / Pave the Mowich Lake Road
- In the absence of access to Ipsut Creek facilities at Mowich should be improved, including paving the road.

Although improvements to the Mowich Lake area have been proposed, paving the road is not among these improvements. In addition, actions at Mowich Lake are outside the scope of the proposed plan, which includes only the Carbon River area. A separate planning process for improvements to the Mowich Lake area began approximately seven years ago but has since been delayed.

- Group camping / expedition hiking experiences should be available.

Although these activities would not be precluded by the proposed alternatives, providing these services is outside the scope of the proposed plan. Commercial services are part of the Commercial Services Plan (NPS 2004) and those provided by organizations are either part of that plan or allowed via a special use permit or existing group camping regulations.

- Maintain a trailhead at the top of the road (#7810) and also a second trailhead with adequate turn around for horse trailers where the Carbon River Road will end.

Road 7810 is not part of Mount Rainier National Park, but rather is part of the Mount Baker - Snoqualmie National Forest. Access for horses was eliminated from the Carbon River Road as part of the Mount Rainier National Park General Management Plan (NPS 2002).

- Consider building a trail to the snout of the Nisqually Glacier. It would be much shorter than the Carbon.

Although numerous comments requested potential alternative ways that visitors could experience the toe of a glacier if day hiking access to the Carbon Glacier is precluded, actions in areas outside the Carbon River are considered outside the scope of the current planning process.