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DEPARTMENT OF THE INTERIOR

FINAL

ENVIRONMENTAL STATEMENT

Proposed

NORTH COUNTRY TRAIL

From the Appalachian Trail to the
Proposed Lewis and Clark Trail

Prepared by: Lake Central Regional Office, Ann Arbor, Michigan
Bureau of Outdoor Recreation
Department of the Interior

Natural Science
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Neil Sai
Depos USA
3/25/76

SUMMARY

() Draft (X) Final Environmental Statement

Department of the Interior, Bureau of Outdoor Recreation, Lake Central Region

1. Type of Action: () Administrative (X) Legislative

2. Brief description of action:

It is recommended that Congress authorize the concept of the North Country Trail within a corridor recommended in the Secretary of the Interior's report. Such authorization would permit the eventual designation of a hiking trail, approximately 3,246 miles in length, originating at the Appalachian Trail in Vermont, traversing New York, Pennsylvania, Ohio, Michigan, Wisconsin, and Minnesota, and terminating at the proposed Lewis and Clark Trail in North Dakota. The Secretary of the Interior would have the authority to designate some sections of the trail "scenic" and recognize others as "recreational."

3. Summary of environmental impact and adverse environmental effects:

Creation of the North Country Trail would preserve a green strip approximately 3,246 miles long by 200 feet wide. Development of the trail and support facilities, while providing a recreational facility, would cause some disturbance of soil, vegetation, and wildlife. Forty-six percent of the trail would be located on public land. Right-of-way for the remainder would have to be obtained by fee, easement, or agreement. The project would cause some local reduction in the tax base and provide some jobs and capital investment. Recreational use of the trail would cause continued disturbance of vegetation and wildlife, and soil compaction along the trail itself. Use creates the possibility of vandalism and littering.

4. Alternatives Considered:

(a) No Action, (b) Different Corridor Locations, (c) Shorter Trail, (d) Segmented Trail, (e) North Country National Scenic Trail, and (f) Alternate Administration.

5. Comments have been requested from the following:

*Advisory Council on Historic Preservation
*Department of Agriculture
*Department of Defense
U.S. Army Corps of Engineers
Department of the Interior
*Bureau of Indian Affairs
*Bureau of Land Management
*Bureau of Reclamation
*Fish and Wildlife Service
*National Park Service
*Department of Housing & Urban Development

*Department of Transportation
*Environmental Protection Agency
*Federal Power Commission
Water Resources Council
State Clearinghouses:
**Vermont
**New York
*Pennsylvania
**Ohio
*Michigan
*Wisconsin
*Minnesota
**North Dakota

*Comments received and attached

**Includes comments from more than one agency or group.

Adirondack Mountain Club, Inc.
American Conservation Association
American Forestry Association
*American Motorcycle Association
American Youth Hostels
*Appalachian Trail Conference
Bicycle Institute of America
*Buckeye Trail Association
*Finger Lakes Trail Conference
*Green Mountain Club
*International Snowmobile Industry
Association

Izaak Walton League
*Keystone Trails Association
National Trails Council
New York-New Jersey Trail
Conference
North American Trail Riders
Council
North Dakota Wildlife Federation
Inc.
Northern Environmental Council
Sierra Club
*Ski Touring Council
Wilderness Society

Comments were also received from the following:

Audubon Society, Mississippi
Headwaters Chapter
Scott M. Bailey
John P. Bay
Mr. & Mrs. Alan Hausrath
Timothy B. Knopp

National Campers & Hikers Associa-
tion
Ralph E. Ramey, Director,
Glen Helen
Carl R. Seelhoff
Tennessee Gas Pipeline Co.
Harry E. Wilson

6. Date made available to CEQ and the public: Draft: 8/30/74 Final:

TABLE OF CONTENTS

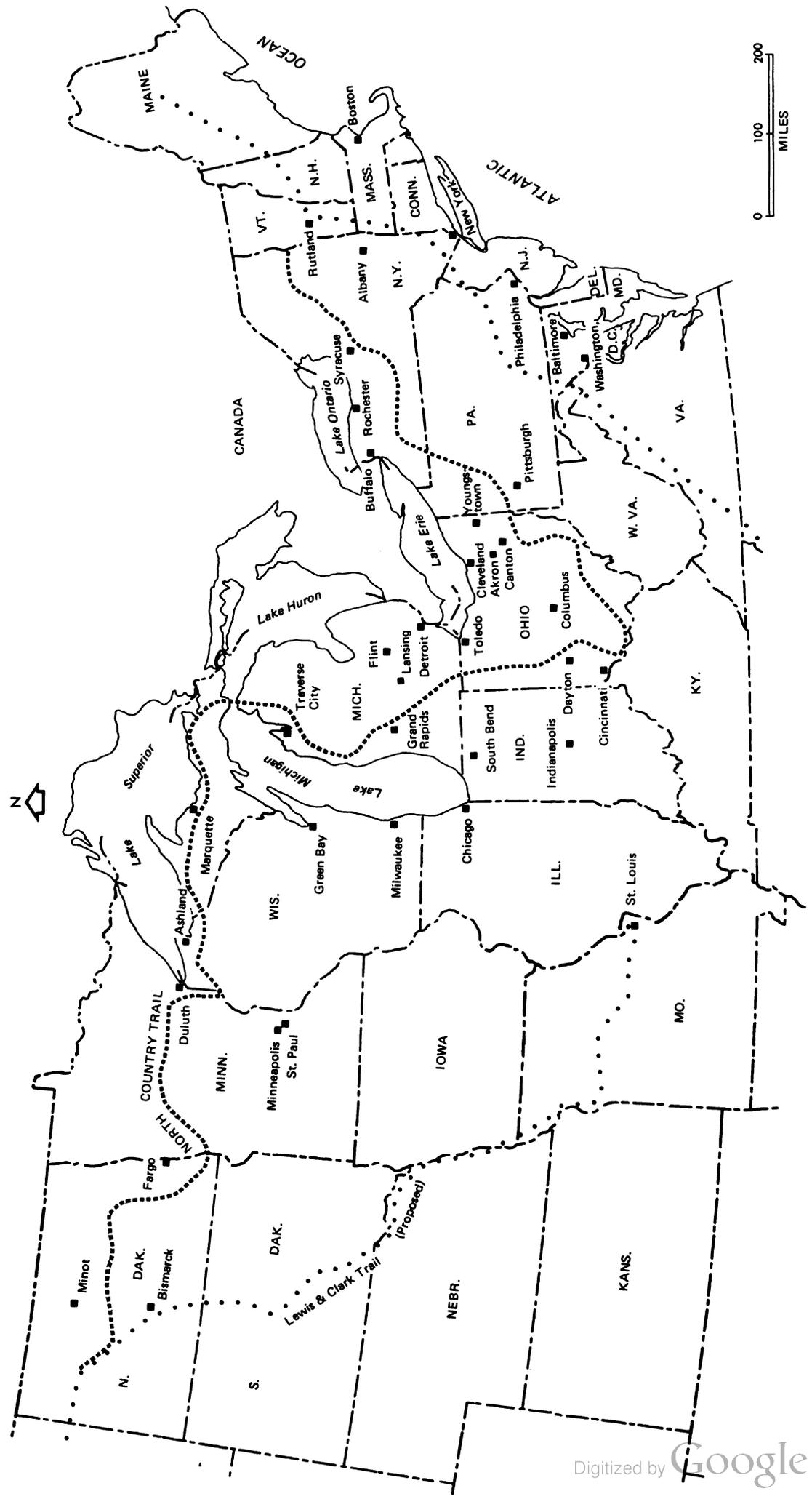
	<u>Page</u>
Summary	iii
I. Location and Description of the Proposed Action	1
The Proposal	1
Trail Alignment.	4
Right-of-Way Acquisition	6
General Standards for Trail Construction	6
Trail Facilities	8
Maintenance.	9
Trail Access	9
Trail Administration	11
Trail Costs.	12
Suggested Time Frame for Development	14
Connecting and Side Trails	14
Satisfying Recreation Needs.	15
Interrelationship with Other Plans and Developments.	17
II. Description of the Environment.	21
General.	21
Description of Possible Trail Route.	21
Eastern Terminus.	29
New York.	33
Pennsylvania.	37
Ohio.	41
Michigan.	49
Wisconsin	61
Minnesota	69
North Dakota.	77
Population	85
Landownership.	85
Land Use	85
Probable Future Environment Without the Proposal	89
III. The Environmental Impact of the Proposed Action	91
Impact on Vegetation	91
Impact on Soils.	91
Impact on Air and Water Quality.	91
Impact on Fish and Wildlife.	92
Impact on Scenic Qualities	92
Impact on Historical and Cultural Features	93
Impact on Recreation	93
Impact on Land Use	94
Impact on Landownership.	96
Impact on Local Economy.	96
Impact on Highways and Utility Lines	97
Impacts Related to Visitor Use	99
Impacts of Use on Other Trails	100
IV. Mitigating Measures Included in the Proposed Action	101
V. Adverse Environmental Effects Which Cannot be Avoided	
Should the Proposal be Implemented	103
VI. Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity	105
VII. Any Irreversible and Irrecoverable Commitments of Resources Involved in the Proposed Action.	107

	<u>Page</u>
VIII. Alternatives to the Proposed Action	109
Alternative Projects	109
Alternative Administration	111
IX. Consultation and Coordination With Others	113
A. Consultation and Coordination in the Development of the Proposal and Preparation of the Draft Environmental Statement.	113
B. Coordination in the Review of Draft Environmental Statement.	113
C. Summary of Correspondence Received Following Review of the Draft Statement	114
D. Summary of Changes from Draft Statement	114
E. Correspondence Received	115
Appendix A.	303
Appendix B.	305
Appendix C.	307
Photograph Credits.	inside back cover
 Maps	
Vicinity Map	viii
Transportation System.	10
Physiography	22
Forest Types	23
Soils.	24
Possible Route Location	
Eastern Terminus.	28
New York.	32
Pennsylvania.	36
Ohio.	40
Michigan	
Lower Peninsula.	48
Upper Peninsula.	54
Wisconsin	60
Minnesota	68
North Dakota.	76
Population Centers	84
 Tables	
Existing Trail Mileage	5
Method of Nonfederal Land Control.	7
Estimated Capital Costs.	13
Estimated Landownership by State	86
Major Land Uses.	88
Estimated Man-years of Employment.	98
Index of Correspondence Received	115



PROPOSED NORTH COUNTRY TRAIL

VICINITY MAP



I. Location and Description of the Proposed Action

A. The Proposal

It is proposed that the Congress authorize the establishment of the North Country Trail as a component of the National Trails System. This proposal is the result of a study conducted by the Bureau of Outdoor Recreation as directed by the National Trails System Act of 1968 (P. L. 90-543). This Act directed that the North Country Trail from the Appalachian Trail in Vermont through the States of New York, Pennsylvania, Ohio, Michigan, Wisconsin, and Minnesota, to the Lewis and Clark Trail in North Dakota (approximately 3,200 miles) be studied to determine the feasibility and desirability of designating it a national scenic trail.

This environmental impact statement deals with the action as proposed in the Secretary's report The North Country Trail, A Potential Addition to the National Trails System. The proposed trail would be located within and along a general corridor identified by the Federal-State field task force. This corridor, averaging ten miles in width, would extend some 3,246 miles from the Appalachian Trail to the Lewis and Clark Trail, traversing the States named in the Act. The report concluded that it would be feasible to designate the North Country Trail a national scenic trail. However, it may not be desirable to designate the entire trail as scenic.

Initially designated sections of the trail would consist of those segments located within the exterior boundaries of Federally administered areas, with management of those trail segments by the Federal administering agency. Segments of trail on nonfederal land would be established on an optional basis through State, local, or private efforts. The Secretary of the Interior would designate, upon appropriate application, Federal, State, local, or private trail segments as scenic or recreational segments of the North Country Trail, provided such segments meet the criteria established in the National Trails System Act and such supplemental criteria as the Secretary may prescribe. Scenic segments would generally be located in the most scenic and remote areas and, in accordance with Section 7(c) of P. L. 90-543, the use of motorized vehicles would be prohibited. Recreational segments would allow the use of snowmobiles.

Since there is no predetermined historic or geographic route for the North Country Trail, the main corridor routing was based on such considerations as the location of points of interest, outstanding scenery, and good terrain for trail location. The lack of either historical or physiographical constraints makes the proposed North Country Trail unique in this respect.

In the National Trails System Act, Congress clearly envisioned a connection between the North Country Trail route and the Appalachian National Scenic Trail in Vermont. Since a trail corridor location through Vermont has not been approved by the State, a connection from New York State to the Appalachian Trail has not been determined. The State of Vermont believes that the current heavy use of the Long and Appalachian Trails precludes locating additional hikers in the vicinity of those trails. The statistics in this environmental impact statement reflect a segment of trail from the Appalachian Trail

in Vermont to Crown Point, New York. All figures pertaining to the trail in Vermont are shown only to derive an indication of cost, landownership, land use, and other information for the entire trail as envisioned by Congress. The report concluded that a viable and essential North Country Trail can be established without traversing Vermont or, in fact, connecting with the Appalachian National Scenic Trail. One or more connections to the Appalachian Trail in New York, Connecticut, Massachusetts, or Vermont may be considered in future planning for the proposed trail.

The Secretary of the Interior, with advice and cooperation of the Secretary of Agriculture and a North Country Trail Council, would coordinate the selection of a trail route within the corridor recommended in the report and develop guidelines for the acquisition, development, and management of the trail.

1. Background

In 1966, Trails for America, the Bureau of Outdoor Recreation's report on the nationwide trails study recommended the establishment of a national system of trails for those who wish to walk, hike, ride horseback, and bicycle. As a part of that system, the report recommended the establishment of a limited number of national scenic trails--long extended pathways traversing the most natural scenic portions of our country and providing the recreationist with exceptional outdoor opportunities. The North Country Trail was one of five possible trails recommended for prompt study to determine suitability for national scenic trail status.

Congress acted upon the general recommendations of the nationwide trails study in 1968 and established, under Public Law 90-543, the National System of Trails. In this Act the Congress stated:

In order to provide for the ever-increasing outdoor recreation needs of an expanding population and in order to promote public access to, travel within, and enjoyment and appreciation of the open-air out-door areas of the Nation, trails should be established (i) primarily near the urban areas of the Nation, and (ii) secondarily, within established scenic areas more remotely located.

Two national scenic trails were designated as initial units of the National System; the 2,000-mile Appalachian Trail and the 2,350-mile Pacific Crest Trail. The proposed North Country Trail was identified as one of the 14 potential national scenic trails to be studied to determine the feasibility and desirability of designating them as additions to the National Trails System by future act of Congress. In accordance with P.L. 90-543, the route to be studied would originate at the Appalachian Trail in Vermont and traverse the States of New York, Pennsylvania, Ohio, Michigan, Wisconsin, and Minnesota to the proposed Lewis and Clark Trail in North Dakota.

In response to Section 5(b) of the National Trails System Act, a Federal-State field task force was organized in March 1971, under the leadership of the Bureau of Outdoor Recreation, to initiate and organize a study of the

proposed North Country Trail. State agencies from each of the eight States, the Federal Highway Administration, the National Park Service, and the U. S. Forest Service made up the task force. Other Federal agencies, local units of government, private interest groups, and Indian tribes have provided assistance essential to the study effort. A partial list of these agencies and groups is included in Appendix A. In addition to the main task force, eight separate State subcommittees were formed. These subcommittees were responsible for the field work and basic data collection necessary for selecting a trail corridor in each State. The location of the various subcommittee corridor selections was coordinated by the task force. When combined, they were adopted as the preferred North Country Trail corridor.

During the study of the proposed North Country Trail, emphasis was placed on those aspects of trail planning specifically prescribed in the National Trails System Act. Major study elements therefore included the characteristics which would make the trail a fitting addition to the National System; the trail route and plans for development; costs for development, operation, and maintenance; expected visitation; landownership and use; and the economic impacts of the trail.

2. Criteria for Trail Designation

To be worthy of designation as a national scenic trail, the trail should incorporate a maximum of significant characteristics. The scenic, historical, natural, and cultural qualities of the areas through which the trail passes must be superior to those of other trails and should be capable of promoting interest and attracting visitors throughout the United States. It should be designed for hiking and other compatible non-motorized uses in a manner that would protect the natural qualities of the trail's environment. As far as practicable, highways, mining areas, power transmission lines, commercial and industrial developments, and any other activities which could detract from the trail experience should be avoided. While not mandatory, it is desirable that the trail be continuous for its entire length.

While the North Country Trail was found to meet the criteria for national scenic trail status, an element of flexibility seemed desirable. It is for this reason that a North Country Trail having both scenic and recreation segments is proposed in the Secretary's report.

The North Country Trail traverses a portion of the Nation's snowbelt where snowmobiling is a major winter activity. While adhering as close as possible to the national scenic trail concept, it was administratively decided that administrators of various trail segments should have the option of allowing the use of snow machines where snowfall is heavy and where the trail receives little or no use by winter hikers, skiers, or snowshoers.

Since Section 7(c) of the National Trails System Act prohibits the use of motorized vehicles on national scenic trails, any segments of the North Country Trail developed to allow snowmobile use would have to be classified as "recreational" trails by the Secretary of the Interior. "Scenic" trails would be closed to all motorized use. The use of "recreation" segments by motorized vehicles, other than snowmobiles, is not recommended because of the conflicts with other uses and the desire to adhere to the spirit of the national scenic trail concept.

3. Compliance with the National Environmental Policy Act

The North Country Trail report presents findings and conclusions and recommends Congressional action to authorize the trail concept and corridor location. This impact statement is made pursuant to those recommendations and the requirements of the National Environmental Policy Act. Because of the distance traversed by the proposed trail as it spans eight States with varied physiography, climate, and socio-economic structure, and the conceptual nature of the corridor, a discussion of impacts must by necessity be general. Initial authorization of the concept would result in the detailed study of the authorized corridor on Federally owned lands. Specific impacts of a trail route cannot be determined until actual route is located within the corridor. The report recommends that the Secretary of the Interior with the advice of a National North Country Trail Council select the route. Section 7(a) of the National Trails System Act states that notice of the right-of-way selection must be published in the Federal Register. Thus, an opportunity for public review of the route will be available. If deemed a major Federal action with significant impacts, an environmental impact statement would be required at the route selection stage. Detailed environmental impact statements could also be prepared by the Federal land-managing agency if that agency determined an environmental impact statement was necessary. Nonfederal segments could become part of the North Country Trail upon appropriate application to the Secretary of the Interior. Prior to designation, a determination will be made as to whether an environmental impact statement is required.

States may apply for grants from the Land and Water Conservation Fund to acquire and/or develop trail right-of-way. An environmental assessment must accompany such application. Thus, consideration of specific environmental impacts of these trail segments would be part of the decision to approve or disapprove Federal assistance. Segments of the trail acquired and developed without Federal assistance would not necessarily have an environmental assessment prepared prior to application for national designation, unless required by the State.

B. Trail Alignment

It was decided that the location of a conceptual 10-mile wide corridor would be more feasible rather than attempting to locate a specific trail tread. One reason for this approach was that changes in land use might occur between now and the time the trail is authorized by the Congress which would require relocation. Secondly, the time allotted for the study would not permit an actual route survey of a trail over 3,000 miles long. The corridor concept would also give managing agencies a reasonable amount of flexibility with actual trail location and construction.

In order to estimate length, right-of-way acreage, landownership, and costs, the proposed report describes a possible route location within the ten-mile wide corridor. The figures in this impact statement are based on the possible route and may change when a definite route is located. Tread location within the corridor should be determined by management organizations based on actual

ground conditions and agency management policies. Significant points of national, State, and local interest would be selected to highlight the North Country Trail alignment. These would include a variety of historic, cultural, geological, ecological, and scenic areas. These significant points of interest would be available from the trail, either by direct routing of the trail or by connecting trails. Areas which would be subject to damage from trail use should be avoided. Between points of interest, the trail would generally be located along river corridors, mountainous ridgelines, or high plateaus in order to obtain views of the scenic environment.

Abandoned railroad rights-of-way present excellent possibilities for tread location in some parts of the trail corridor. States and local governments would be encouraged to utilize abandoned railroads for appropriate North Country Trail segments. Because they usually have firm, well-developed roadbeds and easily negotiated vertical and horizontal alignments, they can easily be converted to trails, especially for bicycles and snowmobiles. Where located near urban areas or where surroundings are suitable for a national trail, old railroads should be given strong consideration. They should also be given consideration as possible connecting or side trails, where they could be used to link urban areas or points of interest to the trail. Examples of railroad rights-of-way which might be incorporated into the North Country Trail are about 50 miles of Lake Superior and Ishpeming Railroad between Munising and Marquette, Michigan (under petition for abandonment), and 7 miles of Penn Central Railroad between Xenia and Yellow Springs, Ohio (abandoned in 1970).

Forty-six percent of the trail would be routed on existing public lands or rights-of-way. This involves some 542 miles on Federal lands and 938 miles on nonfederal public lands. Fifty-one percent, or 1,662 miles, of the trail route involves private land and 104 miles would be located on Indian land. Where available and in keeping with the provisions of P. L. 90-543, existing trails would be utilized for the North Country Trail alignment. The following table lists, by State, existing trail mileages included in the proposed North Country Trail corridor.

Table I
EXISTING TRAIL MILEAGE

<u>STATE</u>	<u>TOTAL MILEAGE</u>	<u>EXISTING MILEAGE</u>
Vermont	54	--
New York	548	214
Pennsylvania	194	64
Ohio	592	<u>1/</u>
Michigan	793	<u>2/</u>
Wisconsin	176	59
Minnesota	389	--
North Dakota	<u>500</u>	<u>--</u>
	3,246	337

1/ and 2/ - Sections of the Shore-to-Shore Riding and Hiking Trail in Michigan and sections of the Buckeye Trail in Ohio are closely paralleled. Generally, however, both of these trails are primarily located within road rights-of-way and may not be suitable for the North Country Trail.

C. Right-of-Way Land Acquisition

An average right-of-way width of 200 feet, or 25 acres/miles, has been established as an acceptable width to protect the trail and provide space for limited trail facilities.

For the 25 acres per mile of trail route proposed for protection, the report recommends that an average of 15 acres per mile be acquired in fee title, 7.5 acres per mile in easements, and 2.5 acres per mile in agreements with landowners. Typically, land acquisition should occur in a manner which will best assure proper protection of the route and enjoyment of the trail by its users.

Right-of-way width would depend upon the nature and extent of the scenic, historic, and cultural values that are to be protected as part of the trail environment. It would also depend upon such practical considerations as land costs, existing developments, and multiple use policies.

Federal agencies, particularly the Forest Service and National Park Service, have the authority to acquire lands within the exterior boundaries of purchase units. Of the 542 miles of the trail within the exterior boundaries of Federally administered areas, about 100 miles would be on nonfederal property. This involves two miles in Vermont, 32 miles in Ohio, and 65 miles in Michigan. Other than the purchase of right-of-way across these inholdings, no other direct Federal acquisition specifically for the trail should be needed under the recommended project plan.

The following table gives a State-by-State breakdown of the nonfederal lands over which public rights-of-way would have to be provided. This table presents the method of right-of-way control as well as actual acquisition for each State. An average of 15 acres per mile would be acquired in fee, 7.5 acres per mile in easements, and 2.5 acres per mile would be controlled through agreements with landowners. Some States have indicated a preference for a different proportion of acquisition, easement, and agreement. This is indicated in Table II, page 7.

D. General Standards for Trail Construction

The proposed trail would cross lands which vary widely in character. Different trail segments would receive varying degrees of use depending on location relative to urban areas or attractiveness. Such diversity in topography, vegetation, soils, and amount and type of use will necessarily require a variety of trail standards to accommodate the trail user while attempting to minimize both environmental impacts and trail maintenance needs.

Although specific standards may vary, the North Country Trail would primarily be a simple facility for foot use. In some areas, horseback riding and bicycling may be compatible uses and standards would vary accordingly. On trail segments designated as recreational, snowmobiling may be permitted where compatible with other trail uses. Selection and implementation of standards would be the responsibility of the agency or organization administering the trail segment involved. The following standards are suggested in the report.

Table II

METHOD OF NONFEDERAL LAND CONTROL^{1/}

State	Miles	Total Acres	Fee Title		Easements		Agreements	
			Acres	%	Acres	%	Acres	%
Vermont	38	950	570.	60	285	30	95	10
New York	240	6,000	475	8			5,575	92 ^{2/}
Pennsylvania	93	2,325	1,162.5	50	1,162.5	50		
Ohio	407	10,175	6,105	60	3,052.5	30	1,017.5	10
Michigan	341	8,525	5,115	60	2,557.5	30	852.5	10
Wisconsin	36	900	630	70	180	20	90	10
Minnesota	160	4,000	2,400	60	1,200	30	400	10
North Dakota	352	8,800	3,784	43	1,848	21	3,168	36 ^{2/}

^{1/} The figures shown are for land presently in private ownership, based on 25 acres per mile. In addition, agreements would have to be made for traversing public lands. Sub-surface rights and additional easements for scenic protection along the trail right-of-way may be needed in some cases where development of one kind or another would be highly detrimental to the trail environment.

^{2/} Includes Indian lands and Finger Lakes Trail System.

Right-of-Way: Land control should be sufficient to protect views from the trail and to provide space for facilities and access areas. Under present and estimated land uses, it is considered that an average width of 200 feet would be necessary. Right-of-way width should depend upon the nature and extent of the scenic, historic, and cultural values that are to be protected as a part of the trail environment. It would also depend upon such practical considerations as land costs, existing developments, and multiple use policies.

Signing: A uniform marker identifying the North Country Trail should be installed at appropriate points and indicate scenic or recreation status. Permitted uses should be indicated at appropriate intervals.

Tread Width: Limited to that needed to make the trail suitable for the recreation use intended, but generally at least 18 to 24 inches. Where snowmobile use is permitted, tread width should be a minimum of six feet for one-way traffic and 12 feet for two-way.

Tread Surface: Should be adequate for the use intended. Type of surfacing would depend upon kind of use intended, intensity of use, and the type of availability of materials in the locality. For moderately heavy hiking use, wood chips may be used. Very heavy use may require gravel or asphalt. Abandoned railroad rights-of-way intended for bicycle use are often covered with limestone fines, which forms a hard surface. Boardwalks could be used across sand dunes and swampy areas.

Grade: Vertical alignment of the route should avoid grades which could, in conjunction with soil, terrain, and climatic conditions, cause deterioration of the trail surface and right-of-way. In general, grades of 15 percent or more should not be used except for short stretches and, where used, should have "easing off" sections. Longer sustained grades should generally not exceed eight percent. Sections where bicycles are permitted should have grades of no more than five percent.

Curvature: Switchbacks should be used in steep areas, and the design involved should consider protection of the trail surface from the effects of erosion to be of primary importance.

Drainage: Trail design should prevent soil erosion and provide adequate drainage of water from the trail surface. This should involve the use of such techniques as angled diversion trenches or steps on steep grades, out-sloping the trail on hillside sections, ditching, and crowning on flat or potentially wet sections.

Clearance: This should be sufficient to prevent interference with trail use in all seasons of the year.

1. Width--Limited to that needed for the use intended, but generally at least two feet wider than the tread on each side.
2. Height--Cleared to a height that will provide at least two feet of overhead clearance for the user. Where snowmobile use is permitted, recommended clearance is 10 feet above expected snow accumulation level.

Bridges and Overpasses: The use of low-traffic-volume county or state bridges, overpasses, and similar structures should be utilized where possible. Where construction is required, bridges should be constructed of native materials and be of simple or rustic design in harmony with the trail environment.

Excavation: When required, excavation should be accomplished with a minimum of disturbance to the trail environment. Where possible, borrow pits and similar unsightly construction by-products located inside the trail right-of-way should be rehabilitated or screened.

Control Devices: Where devices are needed to limit or exclude some conflicting or prohibited use, they should be effectively but not obtrusively placed and be of simple design that can utilize available native materials. Stiles or labyrinth gateways along fenced areas, causeways, or narrow gorges are examples. Control devices should be well marked to prevent accidents and liability.

E. Trail Facilities

A variety of facilities conforming to a trail environment ranging from urban to near wilderness types will be required and should reflect the needs of trail users. In providing facilities and controlling use, the procedures used in heavy-use areas usually differ from those applied to more remote sections of the trail. Heavy day-use areas will require higher design and construction standards. Construction of facilities along the trail should be avoided wherever there are nearby existing facilities in State, County, and

Federal parks and forests. In keeping with the intended character of a national trail, facilities should be of a simple and rustic nature yet substantial enough to handle expected use demands. Township and municipal parks as well as private enterprises may provide facilities compatible with the trail's purpose. Grocery stores, private campgrounds, and resorts all provide facilities and services that may benefit trail users.

As conditions approach the more natural and undeveloped landscape, with associated high scenic values, campsites and sanitary facilities would become more primitive. These facilities should be set back at least 100 feet from the trail and of a recommended design compatible with the surroundings.

On sections where foot travel may be shared with horses, appropriate facilities such as feeding and water places or corrals should be provided. There may also be appropriate signing or some other indication of the location of facilities along the route, but these should not detract from the trail environment.

The location of stopovers should vary from five to 12 miles, probably averaging about eight miles apart, and overnight stops should be located between access points to serve trail users. Where water supply might be a problem, water stops should be spaced at no more than a day's travel apart.

F. Maintenance

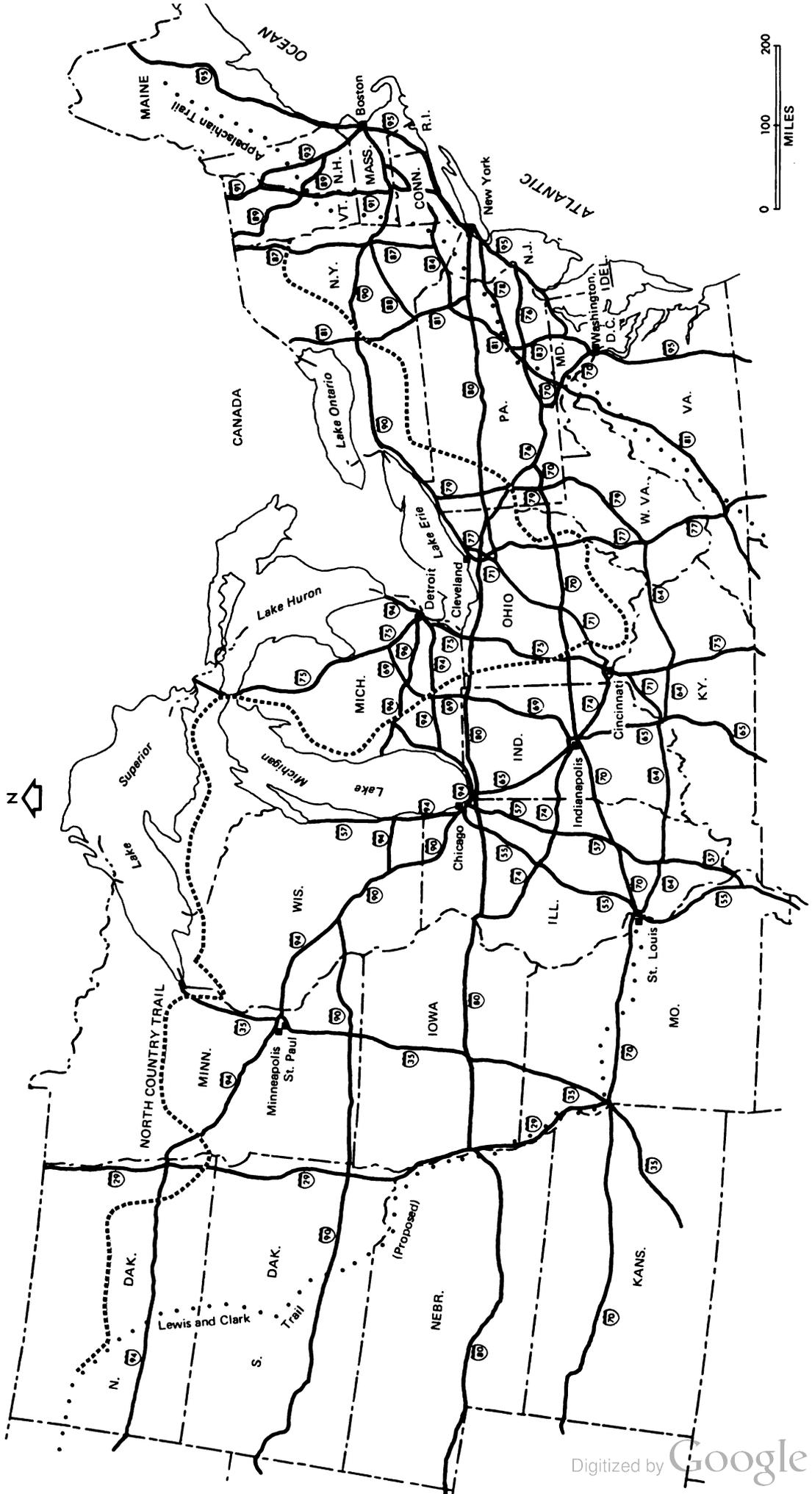
Maintenance requirements will vary with design specifications and intensity of use. It can be assumed, for example, that sections of the trail designed for a combination of uses such as hiking and bicycling will need more intensive maintenance than a simple hiking trail. Bicycles require traveling area and tread improvement beyond that necessary for hiking alone. Use by snowmobiles would require clearing and rolling or dragging of the trail to eliminate moguls (humps). Maintenance would be more critical near urban areas where considerable day-use is expected, while the more remote hiking areas might require only occasional maintenance.

Procedures for maintenance should be clearly established and consistent with terrain and trail design. Maintenance of the trail surface, clearances, and removal of trash from the right-of-way should also be specifically provided. Agreements with local governments and trail clubs should be made as necessary for protection, policing, and general maintenance of the trail. Fire protection measures such as clearing brush from the trail are an important consideration in forested areas.

G. Trail Access

Road access to the trail generally would be good. The trail corridor would cross many Federal and State highways, including 19 interstate highways. Numerous county roads also will be crossed by the trail. Highway crossings would provide ingress and egress points but would not necessarily be incorporated into a trail head or overnight camping area. The possible route location described in the report and this impact statement takes into consideration

INTERSTATE HIGHWAY ACCESS
TO
PROPOSED
NORTH COUNTRY TRAIL



existing road bridges over the affected interstates. It is expected that most crossings of major highways would utilize existing overpasses.

Most of the major points of interest along the trail would also serve as major access points. These include eight national forests; a national lakeshore; a national grassland; and numerous State forests, State parks, State game and wildlife areas, and national historic sites. Many of these areas draw people from all parts of the country. (Most of these areas are identified on the State maps preceding the trail description in Section II.) In many places, access to the trail would be sufficient to allow considerable flexibility for the user to vary the amount of time spent on the trail.

H. Administration

Because the trail would cross extensive private (including Indian) and nonfederal public lands, it is believed that a cooperative effort by all levels of government and the private sector would be the most practical and effective method to develop and maintain the trail. A National North Country Trail Council would be organized which would coordinate selection of the actual route and provide overall leadership and guidance in the administration of the trail. Establishment of the national council would be the responsibility of the Secretary of the Interior. Membership would consist of appropriate Federal and State agencies and representatives from the private sector. The chairman of the council would be appointed by the Secretary of the Interior.

State-level North Country Trail Councils would be established in each of the eight States involved. The State representatives on the national council would serve as chairmen of their respective State councils. Detailed trail planning and management arrangements would be accomplished at the State level with the national council as overall coordinator. The States would be encouraged to acquire, develop, and administer appropriate segments of the trail. Interested local units of government and private organizations wishing to participate in the North Country Trail program would work through their respective State councils. It is envisioned that on-the-ground management would be accomplished by the various land managing agencies involved in conjunction with private trail interests.

All of the States along the route would be encouraged to participate in acquisition of land and in the development and maintenance of the trail. Where considerable governmental authority exists at the county level, the trail would be acquired, developed, and maintained through a coordinated State-county partnership, with participation of trail groups as appropriate. Where considerable governmental authority exists in the State government departments involved in natural resources, recreation/conservation, and planning matters, these agencies might take the initiative. When enabling legislation is necessary, such legislation would be prepared for submission to the respective State legislatures. It is hoped that such legislation would consider a Statewide Trails System in addition to the North Country Trail.

State or local governments would have an opportunity to enter into cooperative agreements with landowners, private organizations, and individuals or to

acquire portions of the trail. In all cases where the trail route passes through State parks, State forest lands, State game lands, and the like, the States would be urged to develop and maintain a route, in accord with the Secretary of the Interior and the national council. Also, local jurisdictions would be encouraged to become partners in the enterprise, either where the trail passes through local parks or on local rights-of-way to the extent of their authority and capabilities. State, county, and local interest would continue to be encouraged as a matter of policy in accord with the intention of the Act.

Where the trail crosses Indian lands, it would be administered by the affected tribes. Coordination and consultation with concerned Indian tribes will occur whenever reservation lands are involved.

Organizations such as the Adirondack Mountain Club, the Buckeye Trail Association, Finger Lakes Trail Conference, the American Youth Hostels, and scouting organizations would be encouraged to participate in the construction and maintenance of the trail. Where the route follows an established trail which exists through agreements with private landowners, it is hoped that such agreements may be continued. Trails established by the Finger Lakes Trail Conference and the Adirondack Mountain Club are an excellent example of cooperation from the private sector. These groups, through their initiative and leadership, obtained agreements with landowners to establish a network of outstanding trails. Where agreements would suffice to ensure adequate protection of the trail right-of-way, they may be used.

I. Trail Costs

1. Land Acquisition

Land costs vary considerably from State to State and range from \$100 to \$5,000 per acre.

High costs and less availability of land will occur near urban areas and near lands being developed for private recreation use. Cost of acquisition is expected to increase through time, particularly in the developing areas. Thus, the amount of right-of-way in developed or developing areas may, for financial reasons, be considerably less than 200 feet. In other areas, the right-of-way may need to exceed 200 feet so as to provide an adequate buffer zone.

Agreements would be entered into whenever they would adequately protect the trail. It is expected that for those lands already in public ownership an agreement in perpetuity would be obtained. Where landowner-trail organizations have existing agreements, these would be modified to fit the requirements of a national trail.

2. Construction

Costs for construction of both trail and related facilities are generally estimated at \$6,000 per mile where no trail exists at present. Where an existing trail is to be improved, the construction cost is

Table III

ESTIMATED CAPITAL COSTS (1973 Dollars)
Proposed North Country Trail

	Capital Costs			Annual Operation and Maintenance Costs		
	Total	Land <u>1/</u>	Construction <u>2/</u>	Total	Operation	Maintenance
Vermont						
Federal	146,000	50,000	96,000	2,100	1,407	693
Nonfederal	1,011,750	783,750	228,000	6,000	4,020	1,980
Total	1,157,750	833,750	324,000	8,100	5,427	2,673
New York						
Federal	--	--	--	--	--	--
Nonfederal	2,063,600	475,000	1,588,600	34,650	22,523	12,127
Total	2,063,600	475,000	1,588,600	34,650	22,523	12,127
Pennsylvania						
Federal	234,000	--	234,000	11,250	7,538	3,712
Nonfederal	2,645,175	2,034,375	610,800	16,350	10,954	5,396
Total	2,879,175	2,034,375	844,800	27,600	18,492	9,108
Ohio						
Federal	670,000	400,000	270,000	1,950	1,306	644
Nonfederal	7,479,188	4,197,188	3,282,000	86,850	58,190	28,360
Total	8,149,188	4,597,188	3,552,000	88,800	59,496	29,304
Michigan						
Federal	2,378,500	812,500	1,566,000	29,400	19,698	9,702
Nonfederal	6,708,563	3,516,563	3,192,000	89,550	59,998	29,552
Total	9,087,063	4,329,063	4,758,000	118,950	79,696	39,254
Wisconsin						
Federal	136,800	--	136,800	10,500	7,035	3,465
Nonfederal	865,500	229,500	636,000	15,900	10,653	5,247
Total	1,002,300	229,500	772,800	26,400	17,688	8,712
Minnesota						
Federal	288,000	--	288,000	7,200	4,824	2,376
Nonfederal	3,036,000	990,000	2,046,000	51,150	34,270	16,880
Total	3,324,000	990,000	2,334,000	58,350	39,094	19,256
North Dakota						
Federal	744,000	--	744,000	20,700	13,869	6,831
Nonfederal	3,458,960	1,202,960	2,256,000	39,150	26,231	12,919
Total	4,202,960	1,202,960	3,000,000	59,850	40,100	19,750
Total						
Federal	4,597,300	1,262,500	3,334,800	83,100	54,015	29,085
Nonfederal	27,268,736	13,429,336	13,839,400	339,600	220,740	118,860
Sum Total	31,866,036	14,691,836	17,174,200	442,700	274,755	147,945

Note: Land and Water Conservation Fund grants may be applied to reduce nonfederal costs up to 50 percent. Thus total potential federal cost could be \$18,231,568.

1/ Cost of land is based on the amount of land to be acquired in fee and easement, and an average cost per acre, both of which vary among the several states.

2/ Construction costs are based on an estimated amount of new trail and upgrading existing trail. Support facilities are included. Cost includes 20 percent for administration.

estimated at \$1,200 per mile. In addition, a 20 percent administrative cost has been added for the initial construction of the trail and related facilities.

There are existing sections of the trail that are being maintained by private trail clubs or conferences. Such organizations have indicated a willingness to bring their existing trails to standard if needed, including construction of new sections of trail. As a result, no costs have been considered for these portions of the trail.

3. Operating Costs

Annual operating costs for the trail and facilities are estimated to be \$150 per mile with about 35 percent for administration and 65 percent for maintenance. No costs have been considered for those parts of the route that would be administered and maintained by trail clubs, conferences, or other groups willing to assume this responsibility.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Public Law 91-646) applies to this proposal. However, since the corridor concept allows for a trail location which could avoid homes and businesses, no cost estimates have been made.

Table III shows estimated acquisition and operation and maintenance costs for both Federal and nonfederal interests on a State-by-State basis. Easement costs were estimated to be three-quarters of those in fee. No cost was allocated to agreements. Land costs in Table III reflect the proportions of acquisition, easement, and agreement shown in Table II.

J. Suggested Time Frame for Development

Within five years after the North Country Trail is authorized by the Congress, Federal funds should be appropriated for the acquisition of lands with Federal proclamation boundaries. In ten years, the trail, including support facilities, should be completed on Federal lands. A similar goal of ten years for completing the trail on nonfederal public lands is also desirable.

Approximately 900 miles of the North Country Trail would be located within 50 miles of cities having a population of 100,000 or more. Such trail segments will probably receive the heaviest use. State and local governments and private trail organizations should locate and establish those segments of trail as soon as possible in view of increasing urbanization resulting in increased acquisition costs.

K. Connecting and Side Trails

During the study, a number of major side and connecting trails were identified which would be desirable and complimentary to the main trail. Emanating from the North Country Trail these routes would lead to:

New York

Albany via New York State Barge Canal system, rejoining the North Country Trail at Rome

Mt. Marcy and the Adirondacks high peak region
Genesee Gorge and Letchworth State Park
The northern Adirondacks via the Northville-Lake Placid Trail
The Catskill Mountains via the eastern part of the Finger Lakes
Trail, (Connecting to Long Path, the Appalachian National
Scenic Trail, and New York City.)
Pine Creek and the proposed Highland Path in Northern Pennsylvania
Canada's Bruce Trail via the Conservation Trail

Pennsylvania

Heart's Content Scenic Area in the Allegheny National Forest
Freeport and Pittsburgh metropolitan trails and the north-
western terminus of the proposed Potomac Heritage National
Scenic Trail via the Baker Trail
The Appalachian Trail in Massachusetts via proposed Highland Path
through northern Pennsylvania and the Catskill Mountains in New
York

Michigan

Sleeping Bear Dunes National Lakeshore and Grand Traverse Bay
The shoreline of the eastern part of the Upper Peninsula
The Keweenaw Peninsula

Wisconsin

The Apostle Islands National Lakeshore from the former Delta
Lookout

Minnesota

Mille Lacs Lake
The north shore of Lake Superior, through the Boundary Waters Canoe
area, and into Voyageurs National Park

North Dakota

The Pembina Hills and the Turtle Mountains

L. Satisfying Recreation Needs

The North Country Trail would provide a facility for recreation activities which traditionally are low density uses of the resource base. While primarily a foot trail, portions of the trail would also be used for bicycling and horse-back riding. In winter, snowshoeing and ski touring could occur where snow cover was sufficient. Snowmobiling may be permitted on trail sections designated as recreational, provided such use does not interfere with snowshoeing, ski touring, and hiking.

90 D.F.P.
Potential visitation of the North Country Trail would be considerable although extremely difficult to estimate. The demand for hiking* and walking for pleasure** within a 100-mile radius of the trail and the trail's capacity for satisfying a portion of that demand have been estimated. Use from within a 100-mile radius of the trail is termed resident use. Hiking demand would come from within the entire 100-mile radius, while demand for walking for pleasure--much of which does not occur on a trail--is believed to originate from within a 50-mile radius. Based on 1970 census and the 1965 participation rates, the annual resident demand for hiking would be 27 million visits and walking for pleasure 232 million visits, for a total of 259 million visits per year.

An estimate of the trail's ability to support use was based on the location of segments of the trail in respect to topography, climate, population centers, and type of use. About 900 miles of the trail would be within 50 miles of cities having a population of 100,000 or more. The use of these segments is expected to be mostly walking for pleasure, and the design capacity of the trail for this activity is estimated to be 150 people per day per mile. The predominant use of the remainder of the trail would be hiking, i.e., day-long trips and backpacking. For the 1,256 more northern and less populous miles of the trail, the capacity is estimated to be 20 people per mile per day. For the remaining 1,090 miles, capacity is estimated to be 40 people per mile per day. Thus, at capacity the entire trail could support 26.6 million visits per year for walking for pleasure and 5.2 million visits per year for hiking. On this basis, the North Country Trail could satisfy 11 percent of the 1970 annual resident demand for walking for pleasure and 19 percent of the 1970 demand for hiking. By the year 2000, this would be 8 percent and 14 percent, respectively. (A more detailed explanation of the visitation methodology is found in Appendix B.)

Several assumptions are made to put these figures into perspective. First, the use of the trail would not be evenly distributed along its entire length. Those areas close to the population centers and the principal points of interest could equal or exceed the capacity figure, while the more remote areas would not meet capacity for many years after the trail is established.

Sections of the trail would also be used for bicycling and horseback riding and possibly for snowmobiling. No estimates can be given for those uses until the actual trail route is located on the ground and the administrators have decided which activities would be compatible.

*Hiking--Walking of a substantial nature in which a pack containing provisions and/or shelter is carried by at least one member of the party.

**Walking for Pleasure--Any walk where the primary purpose is pleasure which has not been included under hiking or nature walks and which lasts 30 minutes or more. (Nature walks--walking for the specific purpose of observing plants, birds, or animals and often including the collection of specimens.) (1965 Survey of Outdoor Recreation Activities, Bureau of Outdoor Recreation, 1967.)

It is expected that the trail would receive its major use from mid-May through mid-October. Those sections near population centers would undoubtedly experience longer periods of use. Also the southern portions of the trail, particularly in Ohio, would have a longer hiking season.

Ski touring and snowshoeing would occur wherever snow cover is adequate. In the years 1969-1973, the sale of touring skis in the Nation quadrupled from 50,000 to 300,000. In 1973, 311,000 pairs of skis were imported from Scandinavia, plus an unknown amount from Bavaria and other countries.* The growing popularity of ski touring indicates that this sport would be an important winter activity on the North Country Trail.

Because of the seasonal interest in the use of trails for snowmobiling, segments of the trail which otherwise meet the criteria for scenic designation may be recommended for inclusion as recreation components. Careful thought will have to be given on the part of trail managers to determine if snowmobiling in a given segment would preempt other winter uses such as hiking, snowshoeing, and cross-country skiing. Snowmobiling is an important outdoor recreation activity during winter in the northern States. Sections of the North Country Trail which receive little or no use by hikers skiers, or snowshoers during the season of snow accumulation might be made available for this activity. Snowmobiling is a preemptive recreation activity, enjoyed by the participant but unappreciated by other users because of noise and the environmental intrusion of a motorized vehicle in the natural surroundings. If a northern trail segment is subject to significant use by skiers, hikers, and snowshoers during the winter, snowmobiling should not be permitted. Other factors which should be considered are the demand for snowmobiling in a given area, the existing supply of snowmobile trails, appropriate topography, proximity of dwellings and wildlife refuges, and management policies of the trail administrator.

Use of the North Country Trail by trail bikes, mini-bikes, motorcycles, or all-terrain vehicles should be prohibited at all times. Like snowmobiling, these are preemptive of other trail uses because of noise and the environmental intrusion of a motorized vehicle on a natural surrounding. In addition, their principal use would occur during the period of peak use by hikers. Where pressures for motorized use of the trail are great, special and separate trail facilities should be provided.

M. Interrelationship with Other Plans and Developments

Each State was represented on the Federal-State task force. Thus, coordination and consideration of State plans and programs occurred during the study. Study team input was not taken as the Governor's position on the project, since this step in the review process is specifically provided for when the Secretary's proposed report is submitted for official review.

With the exception of Vermont, the North Country Trail is in accord with stated trail needs as presented in the Statewide Comprehensive Outdoor Recreation Plans (SCORP) of the States involved. Since the North Country Trail is proposed primarily as a hiking trail, an indication of need for hiking trails is taken as accord. This is not meant to imply that the State has no other trail needs in addition to hiking.

* "The Ski-Touring Council," September 1974.

The recent Vermont SCORP (released January 1974) indicates some overuse of existing trails requiring either user disbursement to less used trails or additional trails. However, without further study, the Vermont SCORP cannot verify a need for more trails in the State. Because of the heavy pressure on the Long Trail and Appalachian Trail, Vermont recommends against locating additional hikers in that area and believes that the North Country Trail would be better located near urban centers in Massachusetts.

The New York SCORP (1972) indicates a need to expand the current recreation trailway system to meet the demand for healthful trail activities. The proposed North Country Trail is discussed as part of that expanded system. The SCORP indicates that Federal financial assistance will be necessary for the North Country Trail in New York.

The Pennsylvania SCORP (1970) includes an action plan to develop a land trail system. The proposed North Country Trail is shown as part of the hiking trail system.

The Ohio SCORP (1971) indicates a need for hiking and riding trails and recommends that trail systems be included in the development of all new park areas in the State. The North Country Trail is discussed as a proposed trail. The State Trail Plan being prepared by the Ohio Department of Natural Resources has considered the North Country Trail as a potential trail in Ohio.

The Michigan SCORP (1974) shows a need for trails in general and trails near urban centers. The proposed North Country Trail is discussed as a potential trail in Michigan.

The Wisconsin SCORP (1972) indicates a need for long-distance hiking trails. The SCORP supports efforts to develop trail facilities which provide opportunities for extended hiking occasions and acknowledges that the North Country Trail would provide such opportunities.

The Minnesota SCORP (1974) shows a need for 1,707 miles of hiking trails for 1975. The North Country Trail has been discussed as a potential trail (for nonmotorized use) which would provide additional recreation opportunities. The SCORP recommends that the State cooperate with the Federal government both in planning and establishing the North Country Trail.

The North Dakota SCORP (1970) states that the demand for hiking and nature study trails in 1969 had exceeded the supply by almost 200 miles, and the deficiency was expected to increase. All levels of government were urged to increase the number of trails.

There are two major water resource development projects proposed in the vicinity of the trail route, both in North Dakota. As part of the Garrison Diversion Unit, the Bureau of Reclamation plans to construct the Stump Lake Feeder Canal, which will connect the Devils Lake chain and Stump Lake, and Lone Tree Reservoir at the headwaters of the Sheyenne, James, and Wintering Rivers. Kindred Dam on the Sheyenne River, A Corps of Engineers project, was authorized in December of 1970. Bureau of Reclamation property around existing and planned features of the Garrison Diversion Unit has been

utilized as the probable location of the North Country Trail. Recreation features of the Garrison Diversion Unit, both existing or those planned by Department of the Interior, are expected to be used by North Country Trail followers. Kindred Dam, however, is not yet in the acquisition stage. This project would eliminate a portion of the wooded river valley environment as a possible trail location but would put more of the trail on public property. Were the North Country Trail to be constructed in the river valley prior to acquisition for the reservoir project, the existence of the trail would not necessarily preclude the reservoir, since the Secretary of the Interior can relocate portions of a national scenic trail.

Authorized COE projects which are existing or under construction were also considered in the location of the corridor and the possible trail route discussed in Section II. Generally, the corridor routing bypasses COE projects in order to avoid conflicts. The only known authorized COE project which was unavoidable is Kindred Dam. COE projects within the 10-mile wide corridor could be considered for the trail location at the route selection stage. Three projects, all in Ohio, appear to be possibilities for consideration: Salt Fork Reservoir, an authorized project southeast of Chillicothe; East Fork Reservoir, under construction on the East Fork of the Little Miami River; and Caesar Creek Reservoir, under construction on a tributary to the Little Miami River.

Since other water resource development projects or navigation projects may be proposed which could affect the location of the trail, continued coordination with the Corps of Engineers and Bureau of Reclamation will be necessary.

The North Country Trail corridor would be located along the Little Miami National Scenic River (Ohio) and the St. Croix National Scenic Riverway (Wisconsin and Minnesota). The trail would also cross or parallel three rivers under study for inclusion in the Wild and Scenic Rivers System. Studies on the Maumee River (Ohio) and Pere Marquette River (Michigan) have been completed and submitted to the President and the Congress. The Secretary's proposed report on Little Beaver Creek (Ohio) has been reviewed, and the Secretary's report is currently being prepared. Recent legislation has listed the Manistee in Michigan and the Upper Mississippi in Minnesota to be studied for inclusion in the National Wild and Scenic Rivers System. The North Country Trail would be compatible with the management plans for existing and proposed national wild and scenic rivers.

Little Beaver Creek has already been designated a State wild and scenic river. Numerous rivers within the North Country Trail corridor have scenic qualities and could be incorporated into a State scenic river system. The North Country Trail would be compatible with State protection of rivers.

The North Country Trail could traverse several areas designated as wilderness areas or wilderness study areas in the Eastern Wilderness Act (P. L. 93-622). These include the Rainbow Lake Wilderness Area in the Chequamegon National Forest, Wisconsin; the Rock River Canyon Wilderness Study Area, Hiawatha National Forest, Michigan; and Flynn Lake Wilderness Study Area,

Chequamegon National Forest, Wisconsin. Trail segments traversing wilderness areas would be designated scenic, since motorized vehicles are prohibited in the National Wilderness Preservation System.

The Interstate Commerce Commission policy regarding railroad abandonment (Public Law 93-236) provides the possibility of utilizing abandoned railroad beds for portions of the North Country Trail.

II. Description of the Environment

A. General

The proposed North Country Trail, 3,246 miles long, would stretch more than halfway across the Nation, from the Appalachian Trail to the proposed Lewis and Clark Trail in North Dakota. This proposed trail would cross mountains, great rivers, the Great Lakes Region, the remote north woods, and vast prairies.

Because of the immensity of the "region" traversed by the proposed trail, a detailed description would require a book. The physiography of so large an area is quite varied. The trail would traverse several major physiographic provinces: the Appalachian Highland, the Central Lowland, the Superior Upland, and the Great Plains. Climate varies from humid continental long summer in the eastern and southern portions of the area to humid continental short summer in the northern midwest to semi-arid in North Dakota. Such geographic diversity provides a basis for a variety of vegetation, wildlife, and land use patterns. Many excellent geographies, histories, and socio-economic treatises have been written on the area.

B. Description of a Possible Trail Route

The North Country Trail is, as yet, still in the corridor concept stage. The trail itself would be located by the administering organizations after considering actual on-the-ground conditions within the 10-mile wide corridor. In order to give some idea of the character of the North Country Trail corridor and to provide a basis for estimates of land use, landownership, and costs, a possible route within the corridor has been described.

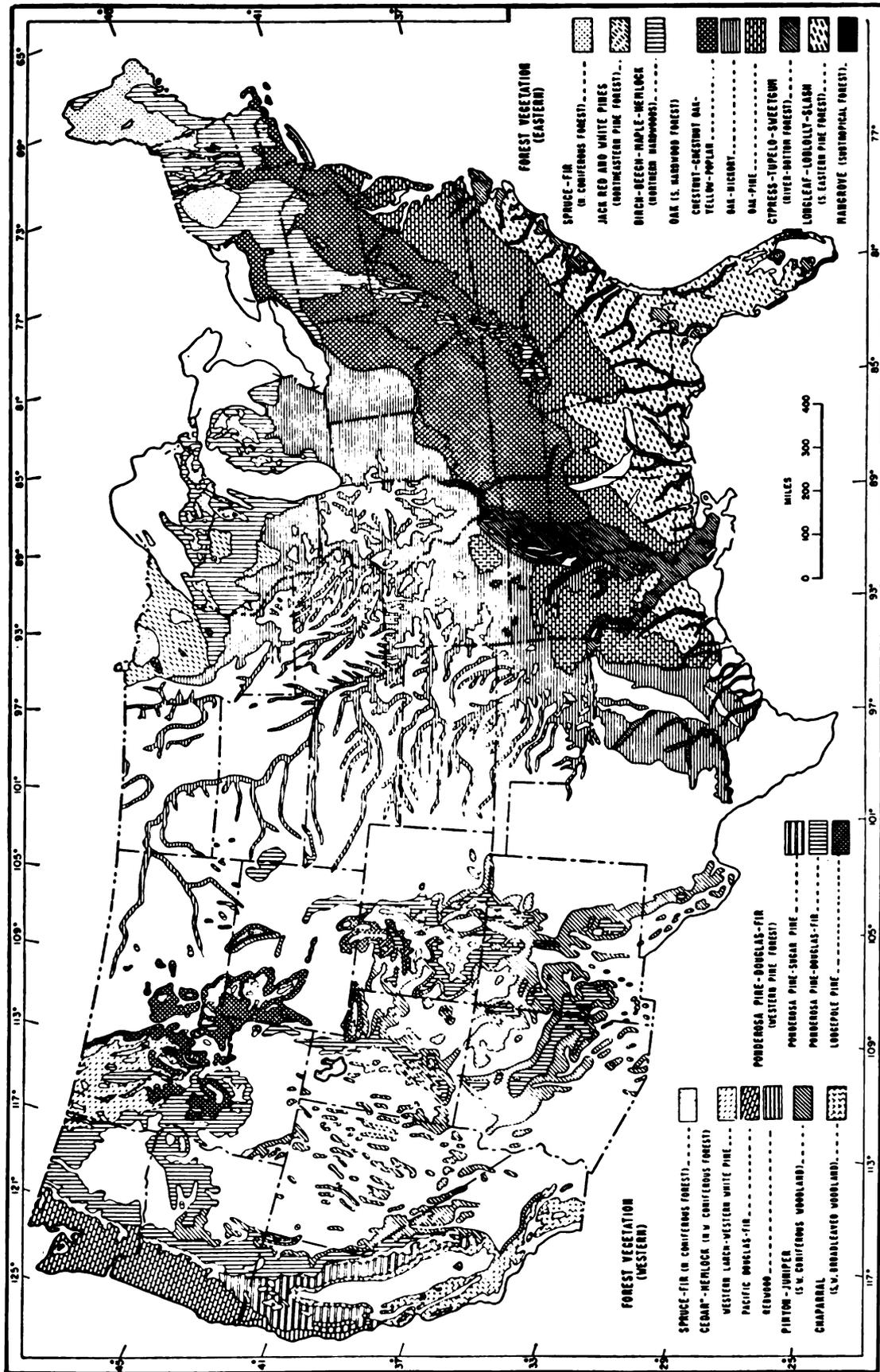
The following trail description identifies the most significant historical, cultural, geological, and/or scenic areas within the corridor to which the trail could provide access, either directly or by connecting trails. The trail route depicted on the accompanying State maps is a possible route within the corridor. The described routing is not intended to be the centerline of the corridor. Actual trail location may not follow this route exactly, thus points of interest visited by the actual trail may be different and trail length may change.

To describe the proposed trail, it has been divided into 21 segments having similar characteristics. Depicted on the accompanying State maps, these segments extend between points as shown starting with point A at the Appalachian Trail consecutively to point V in North Dakota. Each State map shows the location of the points of interest discussed in the narrative description.



From: Land and Water of the United States
 Erwin Raisz, 1950 used by permission

PHYSIOGRAPHY



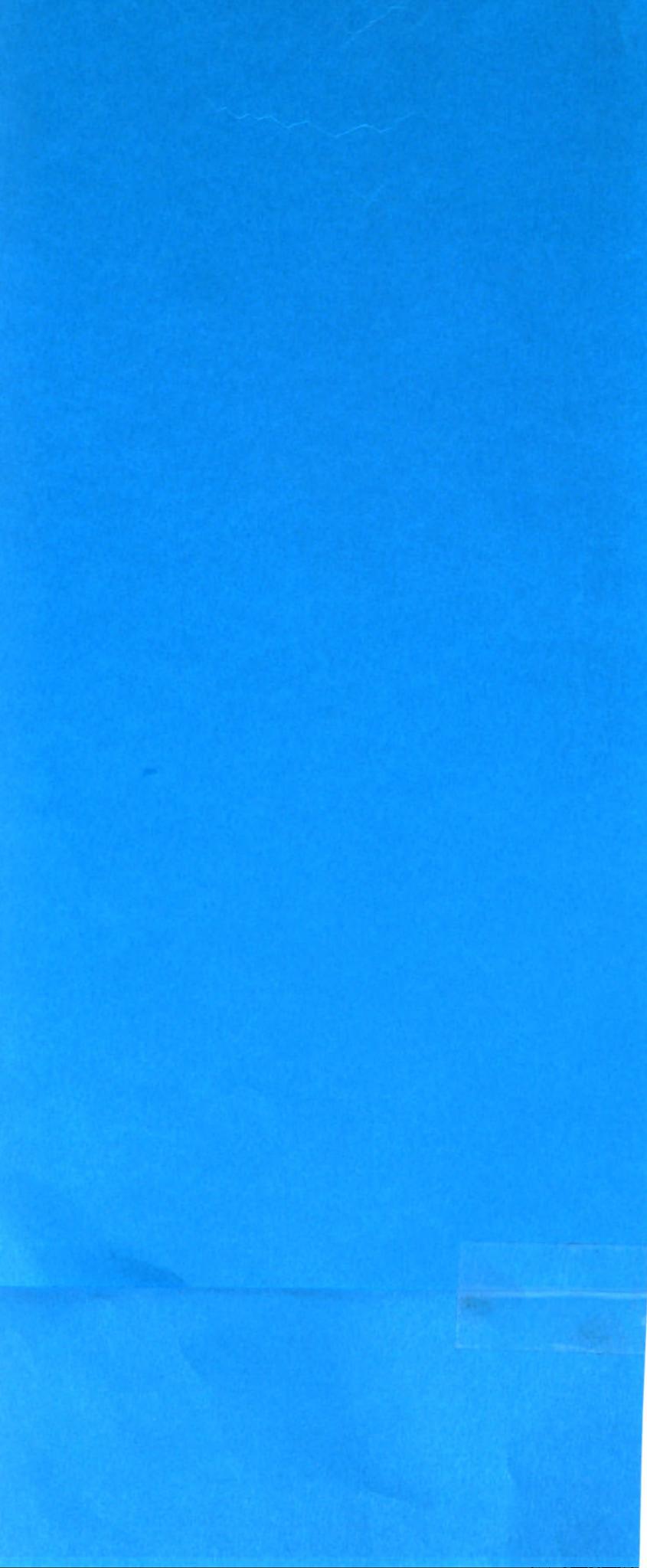
Adapted from Shantz and Zon's "Natural Vegetation" map in the Atlas of American Agriculture.

FOREST VEGETATION OF THE UNITED STATES

U. S. Forest Service

PATTERNS OF SOIL ORDERS AND SUBORDERS OF THE UNITED STATES





Soils in the North Country Trail Area

Only the dominant orders and suborders are shown. Each delineation has many inclusions of other kinds of soil. General definitions for the orders and suborders follow. For complete definitions see Soil Survey Staff, Soil Classification, a Comprehensive System, 7th Approximation, Soil Conservation Service, U. S. Department of Agriculture, 1960 (for sale by U. S. Government Printing Office) and the March 1967 supplement (available from Soil Conservation Service, U. S. Department of Agriculture). Approximate equivalents in the modified 1938 soil classification system are indicated for each suborder.

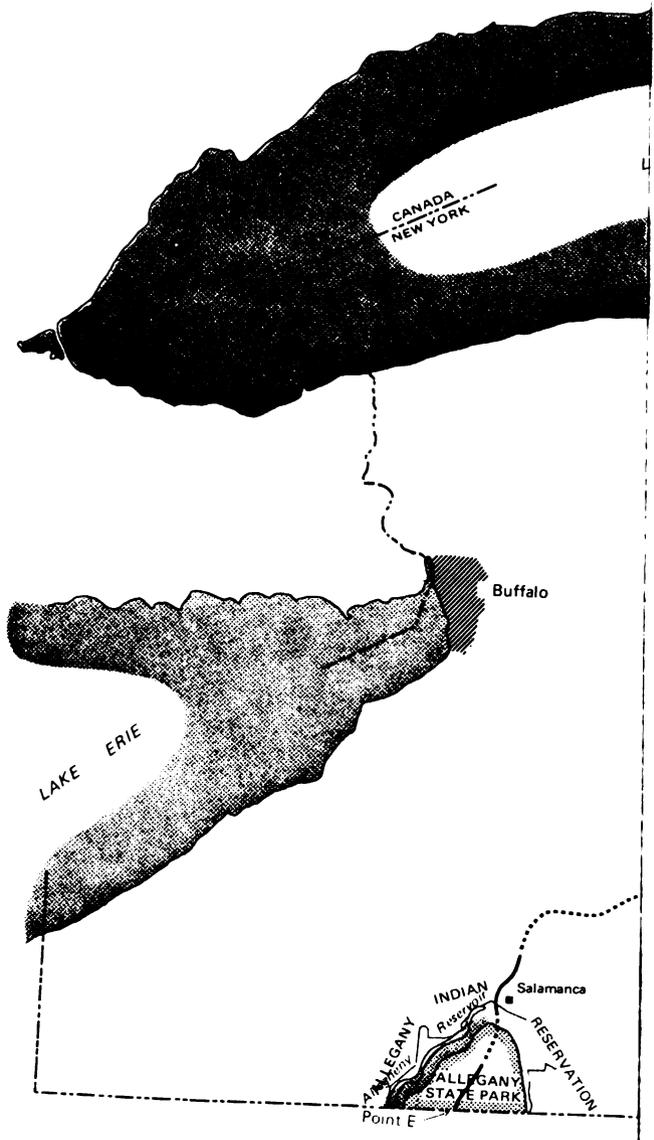
	ALFISOLS . . . Soils with gray to brown surface horizons, medium to high base supply, and subsurface horizons of clay accumulation; usually moist but may be dry during warm season.		MOLLISOLS . . . Soils with nearly black, organic-rich surface horizons and high base supply
A1	AQUALFS (Seasonally saturated with water) gently sloping; general crops if drained, pasture and woodland if undrained (some Low-Humic Gley soils and Planosols)	M1	AQUOLLS (seasonally saturated with water) gently sloping; mostly drained and farmed (Humic Gley soils)
A2	BORALFS (cool or cold) gently sloping; mostly woodland, pasture, and some small grain (Gray Wooded soils).	M2	BOROLLS (cool or cold) gently or moderately sloping, some steep slopes in Utah; mostly small grain in North Central states, range and woodland in Western states (some Chernozems)
A3	UDALFS (Temperate or warm and moist) gently or moderately sloping; mostly farmed, corn, soybeans, small grain, and pasture (Gray-Brown Podzolic soils)	M3	UDOLLS (temperate or warm and moist) gently or moderately sloping; mostly corn, soybeans, and small grains (some Brunizems)
	ENTISOLS . . . Soils without pedogenic horizons	M4	USTOLLS (intermittently dry for long periods during summer) gently to moderately sloping; mostly wheat and range in western part, wheat and corn or sorghum in eastern part, some irrigated crops (Chestnut soils and some Chernozems and Brown soils)
E2	ORTHERTS (loamy or clayey textures) deep in hard rock; gently to moderately sloping; range or irrigated farming (Regosols)		SPodosols . . . Soils with accumulations of amorphous materials in subsurface horizons
E4	PSAMMENTS (sand or loamy sand textures) gently to moderately sloping; mostly range in dry climates, woodland or cropland in humid climates (Regosols)	S2	ORTHODS (with subsurface accumulations of iron, aluminum, and organic matter) gently to moderately sloping; woodland, pasture, small grains, special crops (Podzols, Brown Podzolic soils)
	HISTOSOLS . . . Organic Soils	S2S	ORTHODS. Steep; mostly woodland
H1	FIBRISTS (fibrous or woody peats, largely undecomposed) mostly wooded or idle (Peats)		ULTISOLS . . . Soils that are usually moist with horizon of clay accumulation and a low base supply.
	IMCEPTISOLS . . . Soils that are usually moist, with pedogenic horizons of alteration of parent materials but not of accumulation	U3	UDULTS (with low organic-matter content; temperate or warm and moist) gently to moderately sloping; woodland, pasture, feed crops, tobacco, and cotton (Red-Yellow Podzolic soils, some Reddish-Brown Lateritic soils)
I2	AQUEPTS (with continuous or sporadic permafrost) gently sloping to steep; woodland or idle (Tundra soils)	U3S	UDULTS moderately sloping to steep; woodland, pasture
I3	OCHREPTS (with thin or light-colored surface horizons and little organic matter) gently to moderately sloping; mostly pasture; small grain, and hay (Soils Bruns Acides and some Alluvial soils)		

EASTERN TERMINUS

Segment A-B. Appalachian Trail to vicinity of Crown Point, New York, or other locations along the trail route in New York State.

One or more feasible connections to the Appalachian National Scenic Trail could be made within the States of New York, Connecticut, Massachusetts, or Vermont. The data in this report are based on one such feasible connection in Vermont, since the Congress in the National Trails System Act envisioned a linkage with the Appalachian Trail in that State.

No additional data have been developed for the many other potential connecting routes.



New York

Segment B-C. Near Crown Point Reservation, New York, to Forestport, New York (156 miles)

Near Crown Point most of the trail would be located within the Adirondack Park and Forest Preserve. Near or along the proposed trail route are the Giant Mountain-Dix Mountain complex, Hoffman Notch, West Canada Lake, and Hudson Gorge. Other areas such as Mt. Marcy and Lake-Tear-in-the-Clouds would be accessible from the North Country Trail via the park's existing trails.

Segment C-D. Forestport to Fayetteville, New York (75 miles)

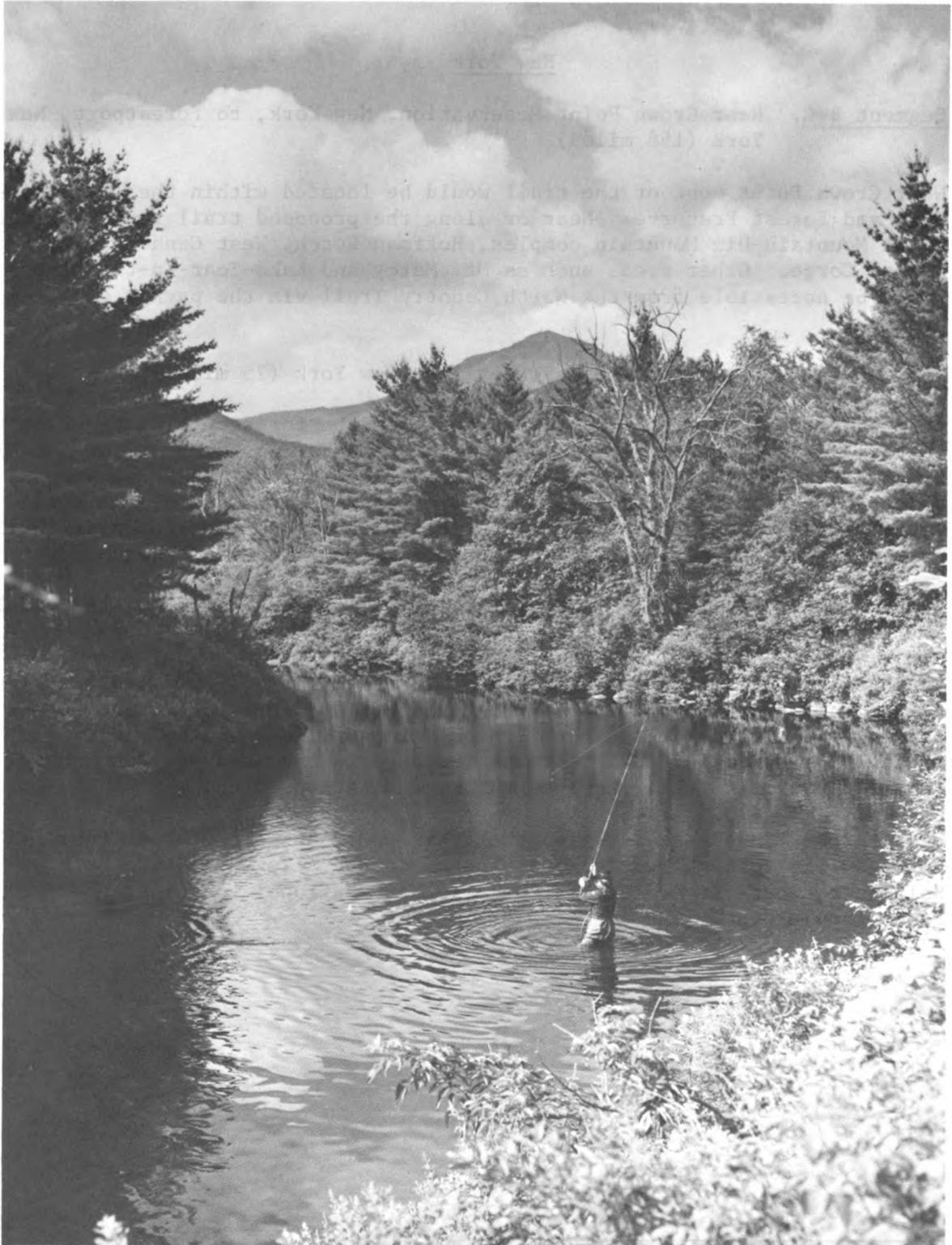
From Forestport the trail would descend from the forested elevations of the western Adirondacks to run southward, generally along the route of the Old Black River Canal to Rome, New York, where the National Park Service is undertaking research excavations at Fort Stanwix. From Rome, the North Country Trail would follow the Old Erie Canal towpath west to Fayetteville, past the site of Fort Bull which dates from the French and Indian War.

Segment D-E. Fayetteville, New York, to the New York-Pennsylvania portal area near Salamanca (317 miles)

South of Fayetteville, near Syracuse, the trail would merge with the Finger Lakes Trail System, portions of which have been completed. State forest and game management area lands with existing trails would be utilized wherever practicable. Some natural features in the area are Taughannock Falls, Buttermilk Falls, Lucifer Falls, and Watkins Glen.

West of the Finger Lakes region the trail would angle southwest from Portageville through several State parks to the Allegany* State Park at Salamanca, where it would join the Allegheny National Forest at the Pennsylvania State line.

*Preferred spelling for New York.



A trail alignment through the Southern Adirondacks would allow fine views of the High Peaks area to the north, without adding to the erosion caused by the heavy use of this alpine area. In this location the trail would offer an exceptionally fine wilderness experience, with a variety of rivers, lakes, and upland areas.

Pennsylvania

Segment E-F. New York-Pennsylvania portal area near Salamanca to Pennsylvania-Ohio portal area at Negley, Ohio (194 miles)

Beginning on the east side of the Allegheny Reservoir, the trail would meander through the Allegheny National Forest on existing forest trails. The Allegheny Reservoir supports populations of bass, pickerel, and perch, while trout occur in the area's streams.

Two scenic areas which were approved for National Natural Landmark status in July 1973, Tionesta and Heart's Content, could be accessible by side trails. At Tionesta Scenic Area, there are giant hemlocks over 400 years old and 300-year-old beeches. Heart's Content Scenic Area contains a stand of mature eastern white pine.

Leaving the national forest near the Village of Maple Creek, the North Country Trail would follow the existing Baker Trail, proceeding through Cook Forest State Park. The largest stand of virgin white pine and hemlock in Pennsylvania, a remnant of William Penn's primeval woods which has been designated a National Natural Landmark, can be found here. The trail would follow the course of the Clarion River to its confluence with the Allegheny River. Crossing the Allegheny River at Parker, the trail would continue southwesterly across the forested Allegheny plateau toward Moraine State Park. Within the park, a section of the existing Glacier Ridge Trail would be utilized. Continuing to the west, the trail would pass through McConnell's Mill State Park located on Slippery Rock Creek.



Existing trails within the Allegheny National Forest could be incorporated within the proposed North Country Trail.

Hemlock, white pine, and northern hardwoods form the dominant forest cover in the Allegheny mountains of western Pennsylvania.



Ohio

Segment F-G. Pennsylvania-Ohio State line to Shawnee State Forest (312 miles)

The trail would enter Ohio along Little Beaver Creek, a State wild and scenic river and proposed addition to the National Wild and Scenic Rivers System. During the last glacial period this area was unglaciated, leaving steep valleys and narrow ridges which contrasts with the flat or gently rolling country encountered by the trail in the northwestern portion of the State. A variety of vegetation types reflect the topographic influences. Beech-maple on slopes; oak-hickory on drier ridges; maple-elm-sycamore in the floodplains; and hemlock, both on drier slopes with rock outcrops and in cool, steep ravines, can be found.

A restored grist mill and covered bridge are located in Beaver Creek State Park, and along the creek are remnants of the Sandy and Beaver Canal, one of the feeder canals to the Ohio-Erie Canal. Generally, the canal would be followed to the Village of Zoar. Many restored homes and stores depict Zoar much as it was in 1817 when it became the first communal settlement in the United States.

In Zoar, the trail would combine with the existing Buckeye Trail, which has been designated the official State trail. Throughout Ohio, the North Country Trail would be closely associated with the Buckeye Trail, and, where desirable, they would be combined as one trail.* From Zoar the combined trails would follow the Ohio-Erie Canal for six miles to Zoarville.

Leaving the canal, the trail would meander through the Muskingum Conservancy District--one of the oldest Conservancy Districts formed in the United States. Recreation has become an important part of its program, utilizing the forest cover and the lakes created by the project. Also found in the District is the site of the underground railroad at Leesville, which sheltered and transported slaves during their escape to Canada prior to the Civil War.

Continuing on to the Wayne National Forest, the trail would wind its way along the Little Muskingum River. Leaving the river near its confluence with the Ohio River, the trail would swing just north of the City of Marietta to the Muskingum River. Marietta, founded in 1788, was the first permanent settlement in Ohio and was named after Queen Marie Antoinette of France.

The trail would cross the Muskingum River and parallel it on the ridge above. One historic site along the way is the Big Bottom State Memorial where a group of early pioneer settlers were massacred by Indians.

Continuing westward the trail would pass through the Wolf Creek State Wildlife Area and the middle unit of the Wayne National Forest.

*Presently, much of the Buckeye Trail is located along highways and these portions would not be suitable for national trail location.

Soon after crossing the Hocking River south of Logan, the trail would enter the Hocking Hills State Park and Forest complex. This is an area of scenic beauty, with deep gorges, beautiful waterfalls, old growth sycamores and hemlocks, rare plants, and massive rock formations containing shelter caves.

Before reaching the Shawnee State Forest the trail passes through Tar Hollow, Scioto Trail, and Pike State Forests. Turning south, the trail would pass near Fort Hill State Memorial where one of the best preserved prehistoric Indian hilltop enclosures in the State is located. The Shawnee State Forest, at the end of this segment, is part of the largest contiguous woodlands in Ohio. This rugged, heavily forested area is sometimes called "Ohio's Little Smokies."

Segment G-H. Shawnee State Forest along the Ohio River bluffs to the vicinity of Pt. Pleasant, Ohio (56 miles)

In following the bluffs above the Ohio River, the trail would offer a broad view of the river valley and the hills of Kentucky in the distance. To the west, the land changes from unglaciated rugged, wooded hills to gently rolling and near level land at the southern edge of Illinoian glacial activity. Steep, wooded ravines and occasional rock outcrops near the bluffs give way to undissected till plain known locally as "the flats." The general scene consists of farms interspersed with wood lots.

About midway along this segment is the John Rankin House. John Rankin, a prominent abolitionist, was a member of the Underground Railroad. At Point Pleasant is General Ulysses S. Grant's birthplace, now a State memorial.

Segment H-I. Pt. Pleasant, Ohio, along Little Miami River to Piqua, Ohio (112 miles)

Leaving the Ohio River, the trail would start a northerly course towards Michigan. In Perintown, on the East Fork of the Little Miami River, is the Cincinnati Nature Center. Abundant small wildlife such as squirrel, raccoon, and opossum, inhabit the area. Birds such as woodpeckers, jays, sparrows, and hawks can also be found. Natural floodplain forest and beech-maple climax forest are intermixed with pine plantations.

The trail would now follow along the Little Miami National Scenic River. This stream, which flows alternately through deep gorges, steep wooded slopes, pleasant farmlands, and small towns, would be utilized for a majority of the trail segment.

Near Lebanon is the Fort Ancient State Memorial, which is situated on a bluff some 270 feet above the river. Two prehistoric Indian cultures consisting of the Hopewell and later the Fort Ancient Indians inhabited the site. Earthworks were constructed to make a three-part enclosure within which the dead were buried and ceremonies performed. A museum displays tools, pottery, ornaments, and methods of burial.

Along the river is the Spring Valley Wildlife Area, an area of natural wetlands. The semi-natural lake in the Wildlife Area attracts a variety



Hocking Hills is known for its massive rock formations and shelter caves. This view is from inside Rock House in Hocking Hills State Park.



Shawnee State Forest is located in the largest contiguous block of forest remaining in Ohio.

of waterfowl. In addition to the marsh, there are oak-hickory woods on the uplands.

Just before leaving the Little Miami River at Yellow Springs, the complex of John Bryan State Park, Clifton Gorge State Nature Preserve, and the Glen Helen Nature Preserve could be visited. The trail would then turn toward the Great Miami River, stay east of Dayton, and pass through gently rolling farm country. The Buckeye Trail could connect the North Country Trail to Dayton, the site of the Air Force Museum.

Segment I-J. Piqua, Ohio, along Miami-Erie Canal to Ohio-Michigan State line (112 miles)

From Piqua, the trail would follow sections of the Miami-Erie Canal to Defiance. Originally, the canal went from Cincinnati to Dayton and was then extended to Toledo. This canal, like its sister the Ohio-Erie Canal, was a main route of transportation in the mid-1800's until it was supplanted by the railroads. Along the canal is the Piqua Historic Area, considered one of the best historic complexes in the State.

The last segment of the North Country Trail in Ohio would pass through a region of flat, fertile farm country where corn is the mainstay of crop production along with wheat, oats, and hay. Specialty crops and livestock operations are also evident.

Continuing along the Miami-Erie Canal, the trail would pass Lake Loramie and Grand Lake St. Marys, Ohio's largest interior lake of some 13,000 acres, located just west of the canal. Both of these lakes were built about 130 years ago to provide water for the canal. Near Spencerville is Deep Cut Park, a National Historic Landmark. Dug by hand, this 6,600-foot long excavation was part of the Miami-Erie Canal and was one of the most spectacular hand excavated canal projects ever undertaken. From here to Defiance, the trail would meander between the canal and the wooded banks of the Auglaize River to visit the most attractive sections of each.

A few miles north of Spencerville, the trail would begin to traverse what was once Ohio's Great Black Swamp. This post-glacial swamp resulted from glacial Lake Maumee which occupied much of the northwestern Ohio and extended into Indiana during the Wisconsin glaciation. The Great Black Swamp was thickly forested and filled with material bogs and pools of water. It was the last area settled in Ohio and is now an extremely rich farming area. Extensive drainage operations were necessary before the area could be farmed.

The trail would cross the Maumee River near Defiance and continue northward through the Oxbow Lake Wildlife Area. Here cattails and rushes provide a fine habitat for frogs, turtles, and snakes. The variety of land cover which ranges from cropland to grassland to woodland also supports such game species as quail, pheasant, rabbit, squirrel, raccoon, and deer. Near the end of the Ohio section of the trail is Goll Woods, a remnant of Ohio's Great Black Swamp. Its virgin swamp forest contains huge oaks and cottonwoods. Goll Woods is a State Nature Preserve and a Registered National Natural Landmark.



A typical agricultural scene in northwestern Ohio.



Although silt laden, segments of the broad Maumee River are frequently attractive.

Michigan

Segment J-K. Ohio-Michigan State line through southern Michigan to the Manistee National Forest boundary (160 miles)

Extending northward from Ohio, the trail would enter Michigan within the Bean Creek watershed. The river and the small tributary streams that make up the drainage basin dissect the flat to rolling terrain, and provide the area with its greatest relief. Originally, the area was heavily forested with extensive hardwood stands. By 1870, most of the timber had been logged off. Agriculture is currently the dominant use of the land, with corn, wheat, and hay the leading cash crops, supplemented by livestock.

Near Albion the trail would cross the Kalamazoo River. The fertile soils of the Kalamazoo River valley produce such commercial crops as celery, onions, apples, grapes, wheat, and barley. From the Kalamazoo River valley northward, the trail would pass through a region of open, gently rolling country.

Just prior to reaching the Barry County State Game Area and the adjacent Yankee Springs Recreation Area complex, the terrain becomes more rugged and the forest cover increases. This area still supports an active sugar bush where maple sap is collected in the spring to make syrup and candy. The State game and recreation areas with their lakes, streams, and marshes in conjunction with wildlife, fishing, bathing, and boating offer extensive recreation opportunities.

The trail would go northward from this area along the Thornapple River, a proposed State "country/scenic" river, to its confluence with the Grand River. East of Grand Rapids, Michigan's second largest city, the Grand River would be crossed. The trail would then utilize the high ground overlooking first the Grand River and then parts of the Rogue River, a State "country/scenic" river.

Segment K-L. Boundary of the Manistee National Forest to the Straits of Mackinac (266 miles)

At Croton, soon after entering the boundary of the Manistee National Forest, the trail would cross the Muskegon River. The general vicinity near Croton is rich in logging history.

Beyond Croton is the Big Prairie area. Once farmland, it is now a sandy area of several square miles. The shifting sands have blotted out trees, houses, and fields and buried the fences that were installed to control the sand movement. Reforestation efforts are being made in hopes of controlling the sand. Not far away is residual prairie land that has been preserved for ecological studies.

From the Big Prairie, the trail would meander toward the headwaters of the White River. The river itself has considerable whitewater which makes for excellent canoeing.

The trail would emerge from the national forest in the vicinity of the Ludington Pump Storage project, which has a man-made holding basin of over



Sandy beach and dunes along Lake Michigan would be visible from the proposed trail.



The proposed North Country Trail would parallel a portion of the Shore-to-Shore Riding - Hiking trail.

800 acres. Water is pumped from Lake Michigan for storage, and when it is returned to the lake, the water runs generators to produce electricity.

Continuing to the northwest, the trail would cross the Pere Marquette River, which is currently being studied for possible inclusion in the National Wild and Scenic Rivers System.

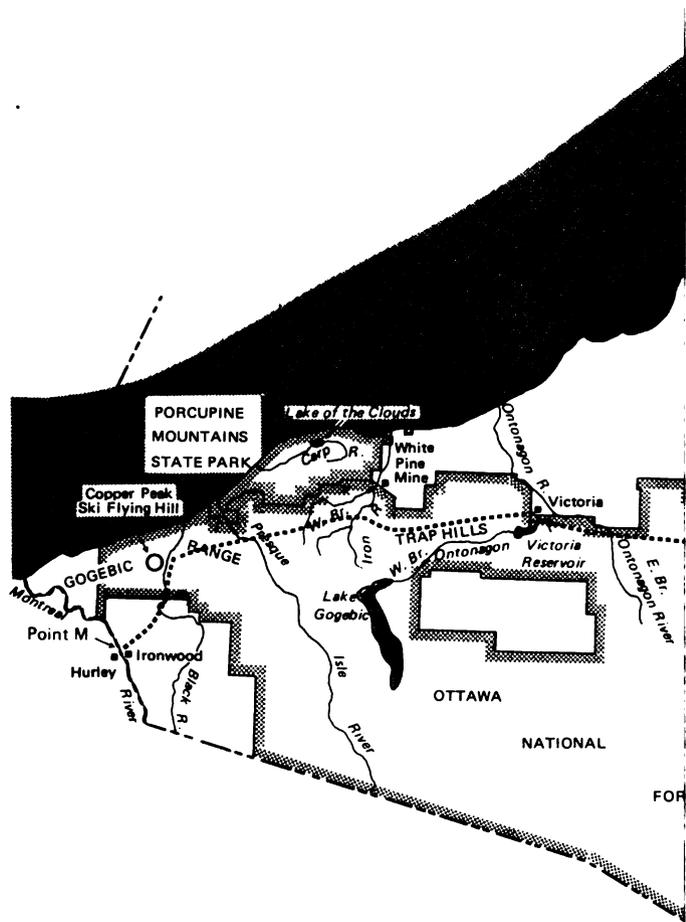
North of Ludington the trail would begin to parallel the shoreline of Lake Michigan, second largest of the Great Lakes. The shore consists of sandy beaches and sand dunes. Inland, this primarily rural area contains fruit orchards and pastures intermixed with woodlands. In the vicinity of Bear Lake, the trail would leave Lake Michigan and head inland. It would cross lands that once were heavily forested with the majestic white pine. By the early 1900's most of the white pine had been logged-off and is now replaced by jack and red pine.

Near Thompsonville, the North Country Trail would parallel the Shore-to-Shore Riding and Hiking Trail which traverses the State in an east-west direction connecting Lake Michigan to Lake Huron. Where desirable, this trail and the North Country Trail would be combined. Much of this last stretch of the trail in the lower peninsula would be on public lands.

Just beyond Kalkaska, the North Country Trail would leave the Shore-to-Shore Trail and swing north to the Straits of Mackinac. The hiker would pass near the Kalkaska State Forest, where large specimens of deciduous species such as maple, birch, and beech can be seen. Beyond the forest, the relief in the topography becomes more pronounced as is evidenced by the several ski areas scattered around Boyne City and Boyne Falls. This area is on the western edge of the range of the only elk herd in the State.

At the Straits of Mackinac, near Mackinaw City, are the log stockades of reconstructed Fort Michilimackinac, located in a State park by that name. Although the name "Fort Michilimackinac" was applied without discrimination to forts successively built at St. Ignace, Mackinaw City, and Mackinac Island, the fort originally built at Mackinaw City is remembered for the Indian massacre that occurred on June 2, 1763.

The Mackinac Bridge, or "Big Mac," with a total length of over five miles connects the lower and upper peninsula's of Michigan. Once a year, on Labor Day, the pedestrian may cross this structure. The trail hiker would cross the Straits during the rest of the year on shuttlebuses or take a ferry from either side, visit Mackinac Island, and complete the crossing by making connections between ferries.



Segment L-M. Straits of Mackinac to the Michigan-Wisconsin State line
(367 miles)

The North Country Trail would continue its journey in the eastern unit of the Hiawatha National Forest. Swinging westward toward Brevoort Lake, the trail would pass through marsh areas and old sand dunes formed by the receding waters of glacial Lake Michigan. Camping and picnicking facilities; an interpretive trail for nature walks; and pike, bass, and panfish are available at Brevoort Lake.

The eastern unit of the Hiawatha National Forest consists of a forest of second growth northern hardwoods, jack and red pine, situated on gently rolling terrain. Adjacent swamp land supports waterfowl such as Canada geese, mallards, black ducks, wood ducks, and occasionally sand hill cranes. This area, like other forested areas of Michigan, was "logged over" and burned. Forest soils were literally burned-off by forest fires which repeatedly ravaged the cutover areas. As a result, the quality of the soil was severely reduced. Jack and red pine, two species that can grow on poor soil, have subsequently been planted in those areas too severely burned to support other forest species.

The trail would pass through the eastern part of Tahquamenon State Park, noted for the Lower and Upper Tahquamenon Falls. The Upper Falls, with a height of 40 feet, extend 200 feet in a sweeping arc, framed between high sandstone walls. The Lower Falls are a series of cascades and falls flowing around an island.

Cutting across Whitefish Point, the North Country Trail would follow along the southern shore of Lake Superior. In contrast to Lake Michigan's sandy shoreline, Lake Superior's is primarily stony with few sandy stretches.

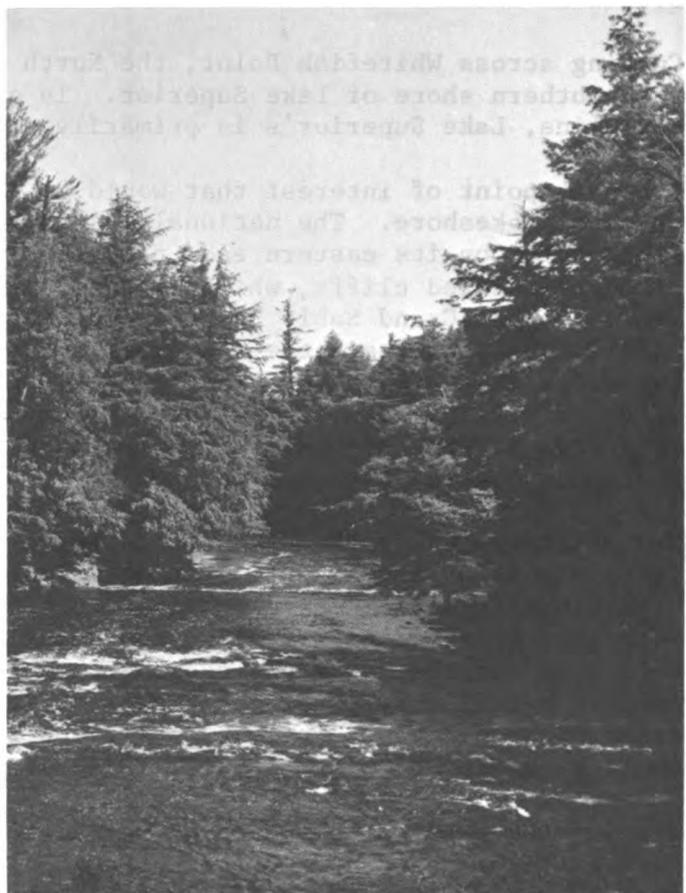
The next point of interest that would be encountered is Pictured Rocks National Lakeshore. The national lakeshore has three aspects: the Grand Sable Dunes on its eastern end; the beach area in the center; and a series of multi-colored cliffs, which rise straight from the water, on the western end. The Grand Sable Dunes, which in places rise steeply from the water's edge, dominate the shore eastward from AuSable Point. Inland from the shore is the Kingston Plain which in the past supported many square miles of virgin white pine timber. Today much of the Kingston Plain is an open area of pine stumps, all that remains of the expansive pine forests that once covered the area.

From Pictured Rocks the trail would leave the shoreline and enter the western unit of the Hiawatha National Forest. The trail would traverse high ridgelines as much as possible to provide intermittent views of Lake Superior, forested countryside, and occasional open fields. Forests in this area and the upper peninsula in general are composed of northern hardwoods and conifers. Maple, beech, ash, basswood, yellow and paper birch are typical deciduous species, while conifers include white and red pine, hemlock, white and black spruce, balsam fir, and northern white cedar.

Staying southwest of the City of Marquette, the trail would proceed inland toward the wild and remote region known as the Huron Mountains, by-passing them to the south. The trail area between Marquette and the trail's point



Such attractions as Lake of the Clouds in the Porcupine Mountain Wilderness State Park could be accessible by a connecting trail.



The North Country Trail would skirt the southern boundary of the park itself, cross the Presque Isle River, and continue on to Wisconsin.

of interception on the Sturgeon River is one of lakes, streams, and swamps. Birdlife in the north woods include goshawk, bald eagle, ruffed grouse, gray jay, raven, hermit thrush, gold crowned kinglet warblers, and many species of waterfowl.

Southwest of L'Anse, the North Country Trail would intercept the Sturgeon River and follow it through stands of jack pine across the flat, sandy expanse of the Baraga Plains. The trail would proceed westward through the Ottawa National Forest towards the Ontonagon River. Although mining is still the principal industry of this area, activity has greatly decreased, as evidenced by closed iron mines and ghost towns, such as Victoria, which was a mining town during the 1800's. Copper mining is still active at the White Pine Mine and was, until recently, still active in mines on the Keweenaw Peninsula. Beyond Victoria, the trail would extend along the west branch of the Ontonagon River. The Trap Hills, with sheer rock outcrops, overlook the river.

After crossing several branches of the Iron River, the trail would head for the Porcupine Mountains, skirting the southern edge of the Porcupine Mountains Wilderness State Park. The main corridor of the North Country Trail would not actually pass through the Porcupines, but there could be a connecting trail with the trail system already existing in the park. From the Porcupines, the trail would assume a southwesterly heading, cross the Presque Isle River (a proposed State wilderness river), and meander to the Black River. Crossing the mouth of this river, the trail would head upstream towards Ironwood.

The last part of the trail in Michigan would follow the crest of the Gogebic Mountain Range. Sticking to the high ground, it would skirt the Town of Ironwood and cross the Monreal River on the border between Michigan and Wisconsin.

Wisconsin

Segment M-N. From the Michigan-Wisconsin portal area near Hurley to Brule River (97 miles)

From the Michigan-Wisconsin portal area located north of Hurley, Wisconsin, the North Country Trail would strike off in a southwesterly direction over the combined Gabbro-Penokee-Gogebic Iron Ranges. These low mountain ranges encompass a large number of topographic features. The Gabbro Range, situated about two miles north of the Penokee-Gogebic Iron Range, are rugged, cliff-topped hills. The Penokee-Gogebic Iron Range is 80 miles long and half a mile wide. In some places it is broad and gently rounded, while in others it is narrow, steep-sided, and serrated. The trail route, in crossing these ranges, would wind through a region of waterfalls, cliffs, rock outcrops, and timber hills. The waterfalls are of particular note. Some, like Potato River Falls, are sheer drops into a gorge, and others such as the Rock Cut Falls are a tumbling series of steep, cascading rapids.

Further west, on the way to Copper Falls State Park, the trail would pass the 1,866-foot Mt. Whittlesey, the highest point along the crest of the Penokee-Gogebic Range. Copper Falls State Park contains two high waterfalls of outstanding beauty within the rocky gorge of the Bad River. In addition to the spectacle of the falls, camping, hiking, and picnicking are available in the park.

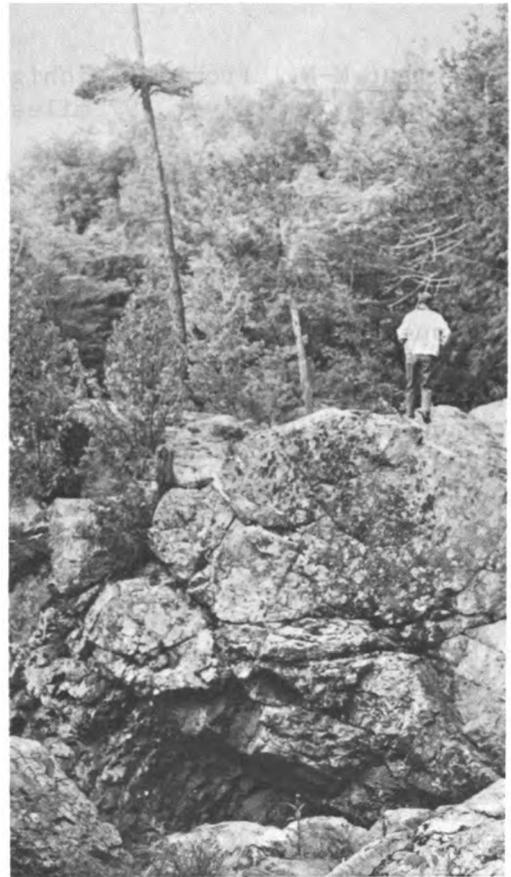
From Copper Falls State Park, the trail would turn sharply to the southwest, passing just west of the Town of Mellen and crossing a break in the Penokee Range known as "the Penokee Gap." Then, a short distance southwest of Mellen, the trail would cross the eastern boundary of the Chequamegon National Forest and join the existing U. S. Forest Service "North Country Trail." Approximately 59 miles of existing trail would be incorporated as part of the proposed national trail. The existing trail extends westward beyond the Penokee Gap, following the Penokee Range briefly, and then meanders northwestward to join and follow the Gabbro Range in a westerly direction through the forest to the Marengo River, which it crosses. The evidence of past mining efforts can be seen. Beyond this point, the trail leaves the Gabbro Range, swings northwestward passing several small lakes and streams and traverses well-forested hills. The Forest Service has constructed three Adirondack shelters, spaced at intervals along the trail. The existing trail continues in a northwesterly direction to the national forest boundary line. From this point, the proposed national trail would continue to the northwest, utilizing the height of land to the Brule River.

Segment N-O. Boise Brule River to the Wisconsin-Minnesota portal area near Danbury on the St. Croix River (79 miles)

Near the point where the trail would intercept the Brule River is a high, rocky vista point from which a broad sweep of the upper Bois Brule Valley can be viewed. The trail would reach the Bois Brule, south of the overlook, and continue along the river past the historic site of the Old Percival Copper mine in the vicinity of the Town of Brule.

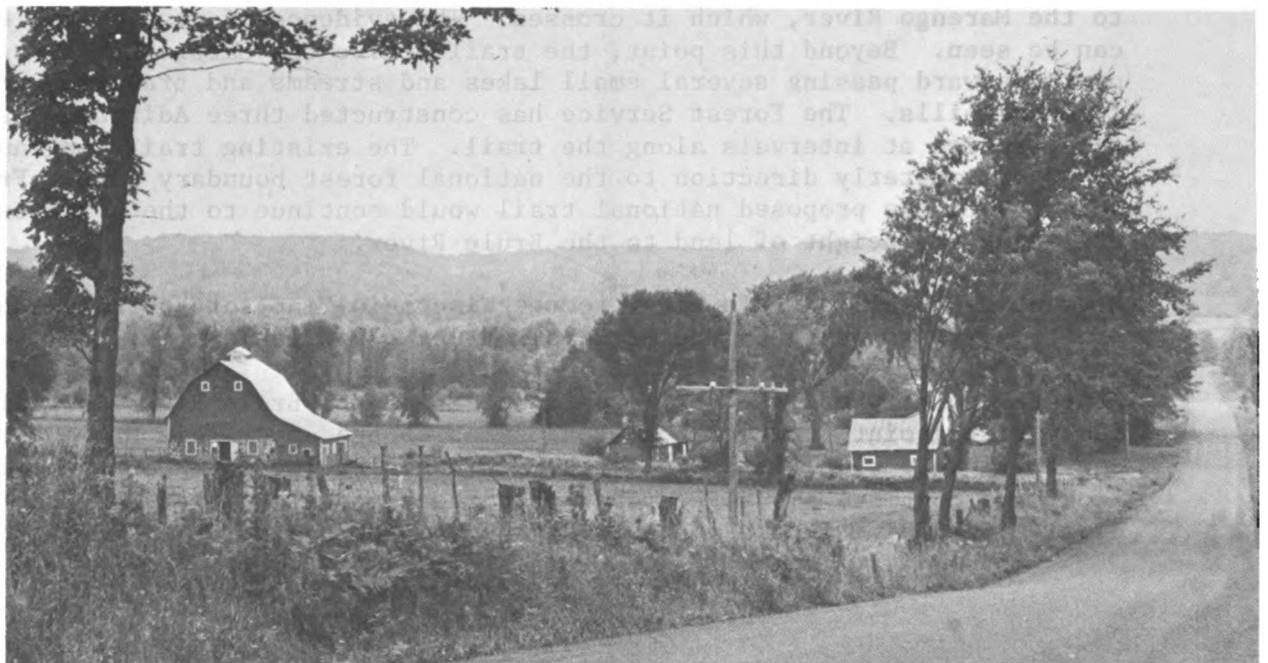


*The Penokee Range provides
a variety of landscapes.
There are scenic waterfalls,*



dense woods, rock outcrops,

and wooded hills with small farms nestled in the valleys.





*Within the Chequamegon National Forest
are almost 60 miles of existing trail.*

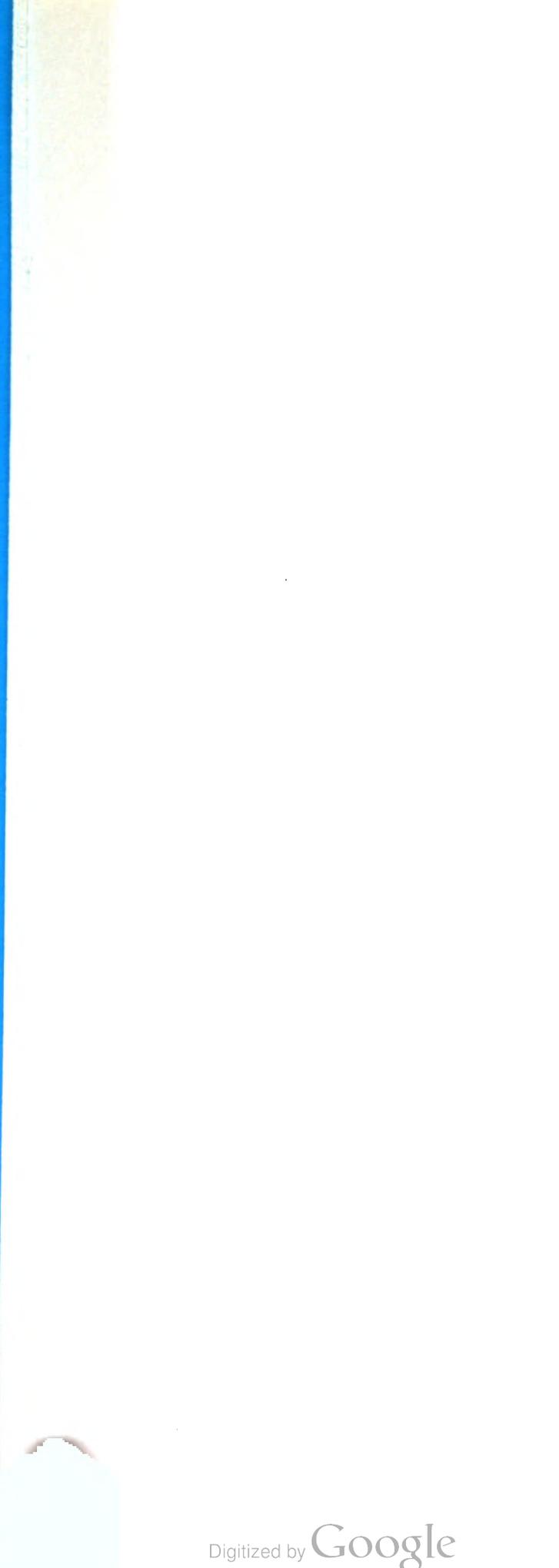
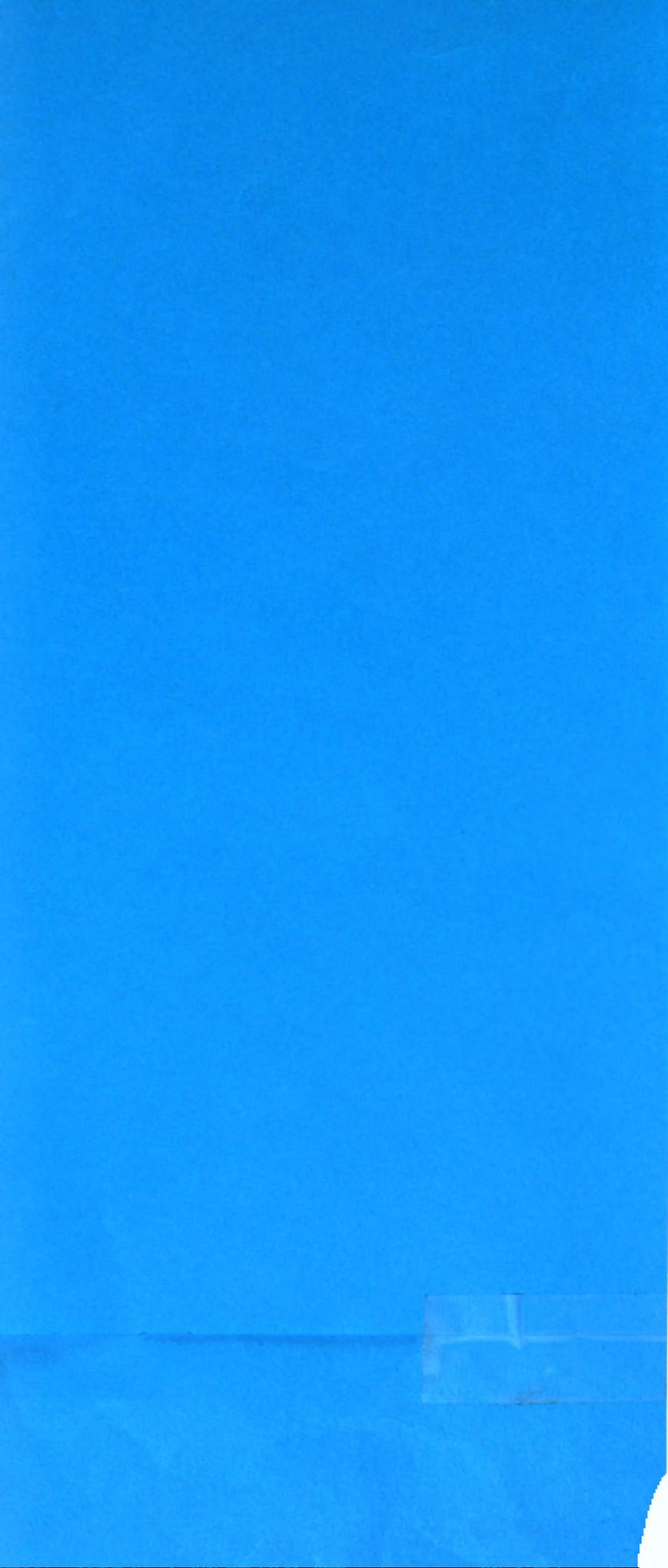


A little further along the trail route on the west side of the river, near the community of Winneboujou, is an old Chippewa-Sioux battleground site of the 1700's. Here the Chippewa (or Ojibwa) and the Sioux fought to determine the right of occupancy. The Chippewa won and the Sioux were forced to depart. Artifacts such as arrowheads, spearheads, musket balls, etc. are still found in the battlefield.

About 14 miles to the south, up the Bois Brule River, the trail would reach the site of the Brule-St. Croix Portage Trail. A centuries-old Indian trail, it became noted as a vital voyageur portage between the waters of the Great Lakes and the Mississippi River. At the portage, the North Country Trail would enter the headwaters of the St. Croix River, a tributary of the Mississippi River. In approaching the St. Croix, the trail would pass through the Douglas County Grouse Management Area, an extensive sand barrens sparsely vegetated with scrub jack pine and hardwoods.

The trail would bear along the north side of the St. Croix Flowage, crossing it over the St. Croix Dam. The trail would pass through the St. Croix National Scenic Riverway, which is managed by the National Park Service. The upper part of the St. Croix and the entire Namekagon River were designated as a part of the National Wild and Scenic River System by the Wild and Scenic Rivers Act of October 2, 1968 (Public Law 90-542). Along the river, the topography varies from high rock or sand bluffs to low marshy areas with occasional sandy hummocks. The vegetation varies from mixed conifers and hardwoods, comprised of various pines, spruces, maples, and several other broadleaf species, including an assortment of swamp species. In the river and other streams and lakes in the basin are found trout, smallmouth bass, muskellunge, and sturgeon. Many species of wildlife are also present, including white-tailed deer, moose, black bear, cottontail rabbit, snowshoe hare, raccoon, gray squirrel, coyote, red and gray fox, mink, muskrat, otter, beaver, ruffed grouse, sharptailed grouse, woodcock, Canada geese, and various ducks.

Like all of the northern lake country, the upper St. Croix has a history of Indian presence, logging, farming, and forest fires.

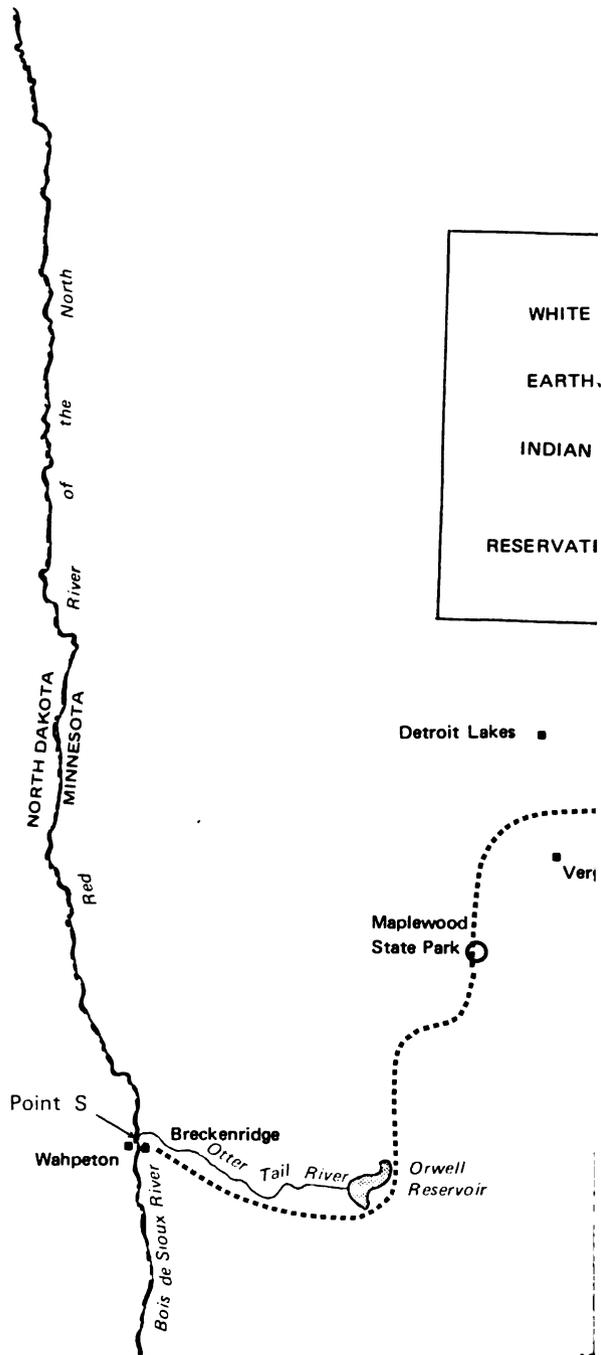




The proposed trail would follow the Bois Brule River within the Brule State Forest, reach the site of the Brule-St. Croix Portage Trail,

then follow the St. Croix National Scenic Riverway to Minnesota.





Minnesota

Segment O-P. From the Wisconsin-Minnesota portal area on the St. Croix River near Danbury, Wisconsin, to the Mississippi River near Ball Bluff, Minnesota (153 miles)

Upon crossing the St. Croix River and entering Minnesota, the trail would pass by St. Croix State Park and through the St. Croix State Forest. To the north, the trail would pass through the Nemadji State Forest, and cross several streams including the Nemadji River, all of which flow northeastward into Lake Superior.

The trail would proceed to Jay Cooke State Park located on the St. Louis River. This is the third largest State park in Minnesota, having an area of over 8,900 acres. From Jay Cooke State Park, the trail would follow the St. Louis River to the Town of Floodwood, then follow the East Savanna River through the Savanna Portage State Park to Savanna Portage. The State park offers trails, camping facilities, picnic areas, canoeing, boating, and fishing. Savanna Portage itself is a six-mile portage that was used by the voyageur, missionary, fur trader, and explorer in the eighteenth century. Archeological diggings at Savanna Portage have uncovered a selection of artifacts that provide a continuous record of the area's occupation ranging from the early Indians to the most recent inhabitants.

From Savanna Portage, the trail would take a sharp turn westward to the Mississippi River. It would follow the river in a northerly direction and cross prior to reaching Ball Bluff. Near Ball Bluff the trail would turn westward again and proceed through Hill River State Forest. The part of the Mississippi River adjacent to the trail route was at one time traveled by small streamboats. Some of the sites of the old steamboat landings can still be located and the locks and lock-keeper's house are still in existence at Sandy Lake near Savanna Portage.

Segment P-Q. From the Mississippi River near Ball Bluff, Minnesota, to the Paul Bunyan State Forest near Akeley, Minnesota (68 miles)

Departing from the Mississippi, the trail would pass westward through the Hill River State Forest. This forest has facilities for the camping hiker, is noted for its areas of scenic timber, and has in its midst the Moose-Willow Wildlife Area. Not many miles west of the Hill River State Forest the trail would enter the Chippewa National Forest--Leech Lake Indian Reservation complex. The Chippewa Indians were once the dominant inhabitants of this area. One of the largest Algonquin tribes, the Chippewa, lived in loosely federated villages. They lived off the land, harvesting planted crops, hunting, gathering wild rice, and intermittently warring with the Sioux and Fox Indian tribes, their neighbors. In the eighteenth century the Indians were supplanted by the fur trappers, loggers, and settlers. The Chippewa still live here, accompanied by such reminders of the Indian past as burial mounds, battlefield sites, legends, and the continuing practice of harvesting wild rice.



Near Duluth the trail would pass through Jay Cooke State Park along the St. Louis River.



Minnesota's woods, such as this stand of Norway pine, provide an appropriate environment for a scenic trail.

This area contains dense boreal forests intermixed with many swamps and lakes. Wildlife supported by this varied habitat includes white-tailed deer, bear, moose, timber wolf, bobcat, mink, otter, muskrat, porcupine, and raccoon. Dominant waterfowl, particularly during the migratory season, consists of Canada goose, mallard, bluebill, loon, goldeneye, and teal. Notable sport fish are walleye and northern pike.

Segment Q-R. From the Paul Bunyan State Forest near Akeley to Frazee (80 miles)

From the eastern boundary of the Paul Bunyan State Forest, the trail would be routed obliquely to the northwest through the Paul Bunyan State Forest. The trail would pass through terrain that consists of forested, rolling hills to Itasca State Park, where Lake Itasca is acclaimed as the origin of the Mississippi River.

From Itasca State Park, the North Country Trail would be routed southwestward, passing through both the White Earth Indian Reservation and White Earth State Forest. Adjacent to the Reservation is the Tamarac National Wildlife Refuge. The area offers opportunities for a multitude of wildlife-oriented trail activities. During migratory seasons, the lakes are teeming with many species of waterfowl. In the woods are found white-tailed deer, black bear, and assorted smaller animals. The refuge also contains a large group of Indian burial mounds known as the Flat Lake Mounds.

Leaving the Tamarack National Wildlife Refuge, the trail would wind southward through the lakes area east of Detroit Lakes to Frazee, where it would cross U.S. 10. The region between Tamarac National Wildlife Refuge and Frazee is more heavily developed than most of the territory along the trail route west of the Mississippi River. Much of the country is grassy and open, with occasional lakes, wooded areas, and streams.

Segment R-S. Frazee to the Minnesota-North Dakota portal area at Breckenridge, Minnesota (88 miles)

From Frazee, the North Country Trail would continue southward through the heart of the Detroit Lakes country, where many large lakes, rural homesteads, and resorts can be found. Along this segment, the trail would pass by the Bradbury Homestead and ghost town located three miles west of the Town of Vergas. Bradbury Homestead is a historic site recognized by the State of Minnesota.

Beyond Bradbury Homestead, the trail would extend to Maplewood State Park, situated in part of Minnesota's lake and farm country. From here, the trail would take a long sweep to the southwest, bypassing Fergus Falls on the west, and joining the Otter Tail River above the Orwell Reservoir and Wildlife Management Area. The trail would follow the Otter Tail River, entering the open prairies that occupy the eastern extension of the Lake Agassiz glacial

*The ancient art
of collecting
wild rice is
still practiced
by the Indians.*

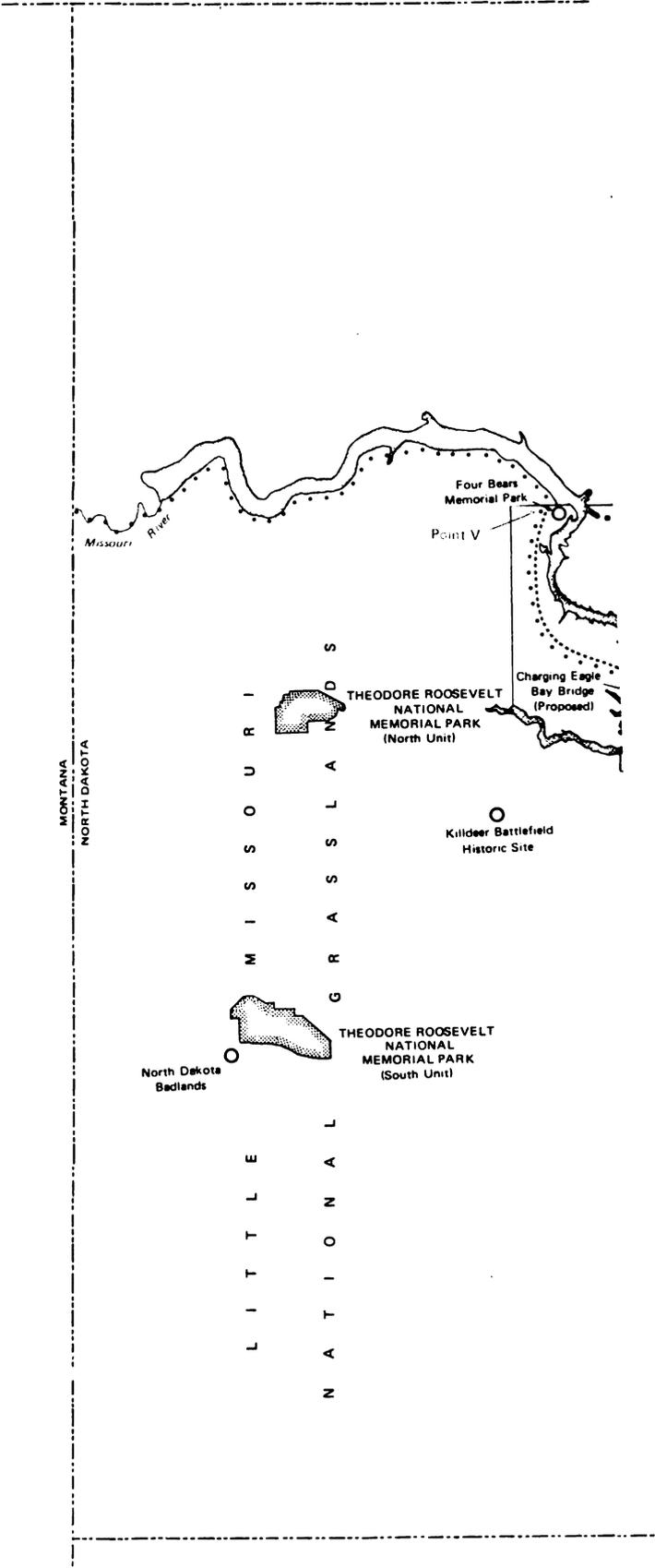


Lake Itasca is acclaimed as the origin of the mighty Mississippi.



plain. The plains area has been developed as an extensive farming area for intensive cultivation of specialized crops. This region contrasts with much of the rest of the corridor area in Minnesota in that it is flat and has very little wooded area. Most of the trees occur either along the river or in windbreaks that were planted along the edges of fields. Sugar beets, grain, potatoes, and giant sunflowers are the major crops.

The trail route would follow the Otter Tail River to the selected portal area between Minnesota and North Dakota near the confluence with the Red and the Bois de Sioux Rivers.



North Dakota

Segment S-T. Minnesota-North Dakota portal at the Breckenridge-Wahpeton crossing on the Red River to Devils Lake (256 miles)

North Dakota provides the only western accent to the entire North Country Trail. The initial part of the trail's journey would take it up the Red River valley through which flows the Red River of the North. Along this part of the trail, the hiker would be traveling over the bed of glacial Lake Agassiz, an enormous lake larger than all the Great Lakes combined, which once occupied much of the northern plains. The trail would follow along the Red River within this glacial lake bed to Fort Abercrombie. In pursuing this course, the trail would traverse a route established by travelers far back in the area's historical past--buffalo herds, Indians, traders, soldiers, the Red River carts, and even steamboats.

The area west of the Red River was Sioux territory until the arrival of the white settlers. With the migration of settlers in full swing, the Army established a chain of forts along the route from St. Paul to Montana. Fort Abercrombie, now a historic park, was constructed in 1858 on the bank of the Red River at the approximate head of navigation. This historic site at the gateway of the Great Plains is a place that was significant in the era of western expansion.

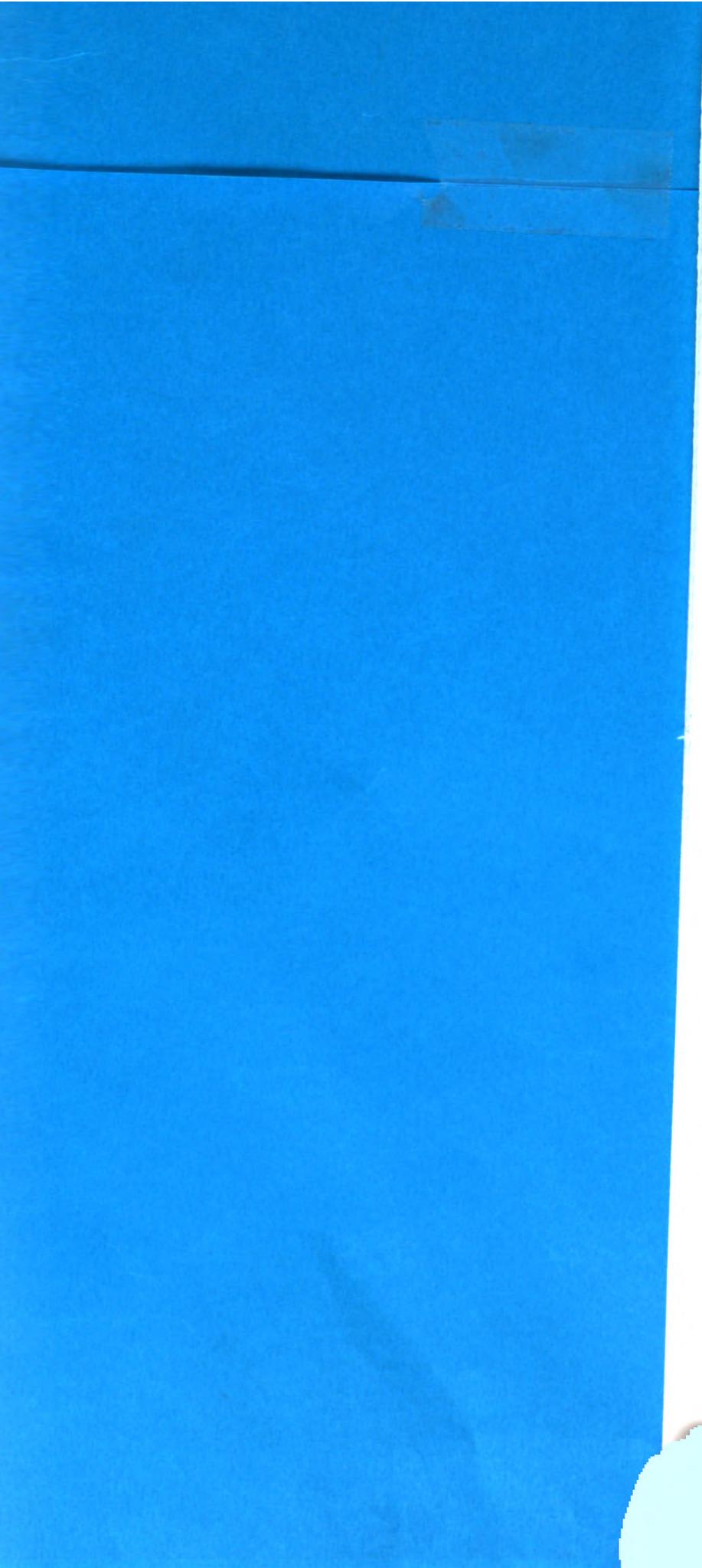
From Fort Abercrombie the trail would briefly follow the Wild Rice River northward, then break to the west along the former route of the old Fort Abercrombie-Fort Ranson-Fort Totten Trail. Along this route, the trail would meander through sand hills formed by Lake Agassiz and wooded, glacial valleys to the Sheyenne River, which contains one of the few extensive hardwood stands remaining in the State. Along this section of the Sheyenne River is a bottomland forest of mixed hardwood trees in a sandhill setting. The forest community achieves its optimum development in this part of the Sheyenne River valley, the most scenic portion of which is between the Towns of Kindred and Anselm. In this 50-mile stretch, basswood trees attain magnificent size, and most of the timber volume of this species along the 250-mile reach of the river from its mouth to Valley City occurs here. A wide variety of trees, shrubs, and grasses are found in this area, some of which are unique in the State of North Dakota. This forest and its setting are unique in North Dakota, and probably the Nation. This area would be inundated if the proposed Kindred Reservoir is constructed. In the event the reservoir is constructed, the trail would skirt the reservoir and provide access to the 2,510 acres of recreation land that would be provided with the reservoir development.

In the vicinity of Anselm, near Pigeon Point, a high point used as a lookout in 1867 on the Ft. Abercrombie-Fort Ranson Trail, the trail would leave the Sheyenne River briefly and swing out across the Sheyenne National Grasslands. This 71,000-acre area is located on a 750-square mile delta of glacial Lake Agassiz, and is now known as the Sand Hills of southeastern North Dakota. The Sheyenne National Grasslands, an area managed by the U. S. Forest Service,



Portions of the trail would follow the wooded valley of the Sheyenne River. Several vegetative species that are unique in the state can be found here.





is significant because it is one of the last really large remnants of the tall grass prairie in North Dakota. The two most important grasses are little bluestem and big bluestem, accompanied by other species such as needlegrass and dropseed which occur on the uplands or shallow rocky soils.

From the national grasslands, the trail would rejoin the Sheyenne River, following a historic route that served the lower Sheyenne River Valley. The trail would make connection with the old Fort Ransome Historic Site and pass through the Mirror Pool State Game Management Area. In the vicinity of Ft. Ranson is the Ft. Ranson Game Management Area, Mooring Stone Pond, and Clausen Springs. The history of Clausen Springs dates back almost 200 years and includes visits by such explorers as Lt. John Fremont and the Frenchman Jean Nicolet. In 1853, this was the site of a great Indian encampment holding council to protest the white man's trespass on their treaty rights. This area contains a remnant of original hardwood forest and a 50-acre lake stocked with trout and salmon. Also located here is Little Yellowstone Park, a natural area offering both camping and hiking facilities.

Fort Ranson, another in the western chain of forts, once housed over 200 troops. Today, its remnants are preserved by the State Historical Society. In the same general area, granite slabs have been found that are inscribed with unknown markings of unknown origin.

From Fort Ranson, the trail would continue along the Sheyenne River to Valley City. Also along this stretch is Hobart Lake National Wildlife Refuge. Upstream from Valley City is Bald Hill Dam and Lake Ashtabula, constructed by the Army Corps of Engineers. This reservoir project provides areas for boating, fishing, picnicking, camping, and hunting, with nearly 2,300 acres of public land above normal pool and 78 miles of shoreline. From the northern end of Lake Ashtabula, the North Country Trail would follow the Sheyenne River northward for some 50 miles before entering the Fort Totten Indian Reservation south of Devils Lake.

Segment T-U. Devils Lake to Riverdale (144 miles)

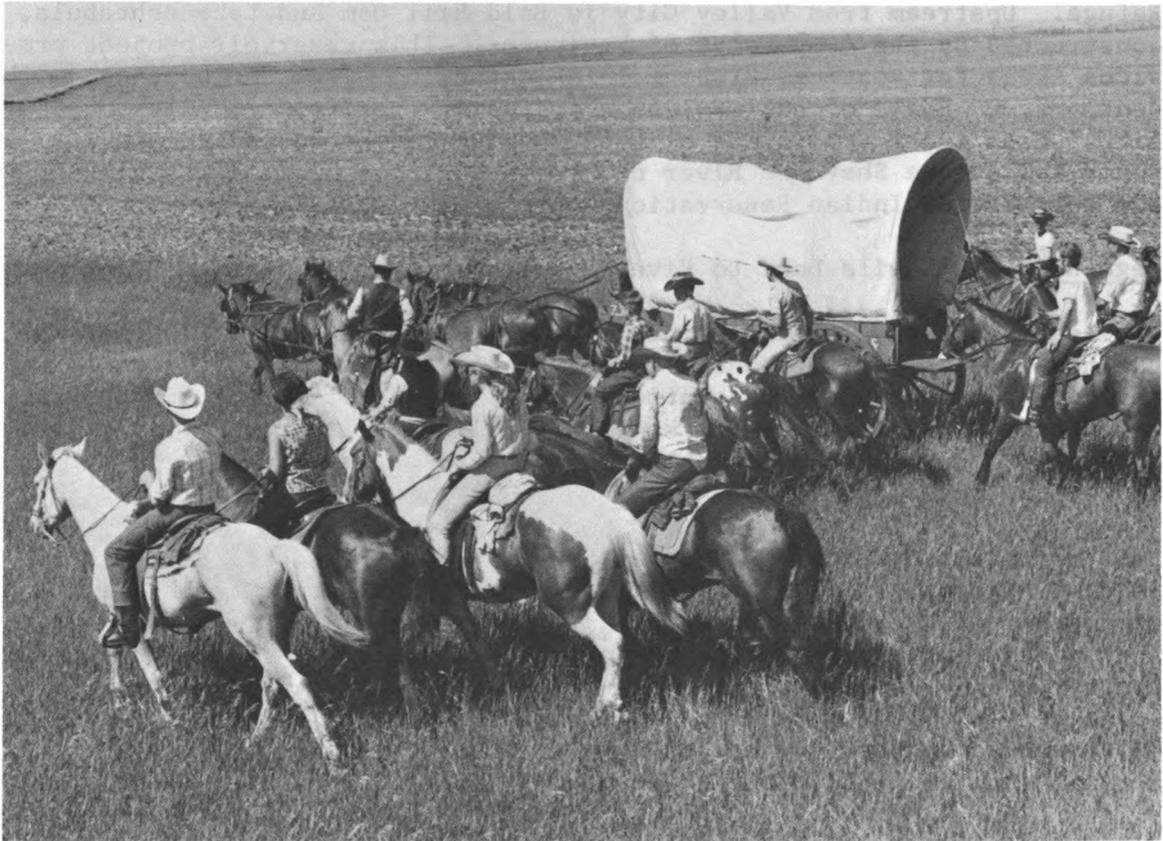
Devils Lake is the largest natural lake in North Dakota and is the heart of the homeland of several bands of Sioux Indians. Part of the lake is within the Fort Totten Indian Reservation. All of the area through which the trail would pass is prime waterfowl habitat. Sully's Hill National Game Preserve adjacent to Devils Lake is noted for its herds of elk, deer, and buffalo, as well as waterfowl.

Fort Totten has the only preserved original cavalry square in the United States. The original buildings constructed in 1867 of brick kilned on the site are still standing and in good repair. The old fort contains an excellent museum, and a little theater group regularly presents plays in the old theater.

The proposed Garrison Diversion Unit, under construction by the Bureau of Reclamation, includes plans to connect the Devils Lake chain and Stump Lake



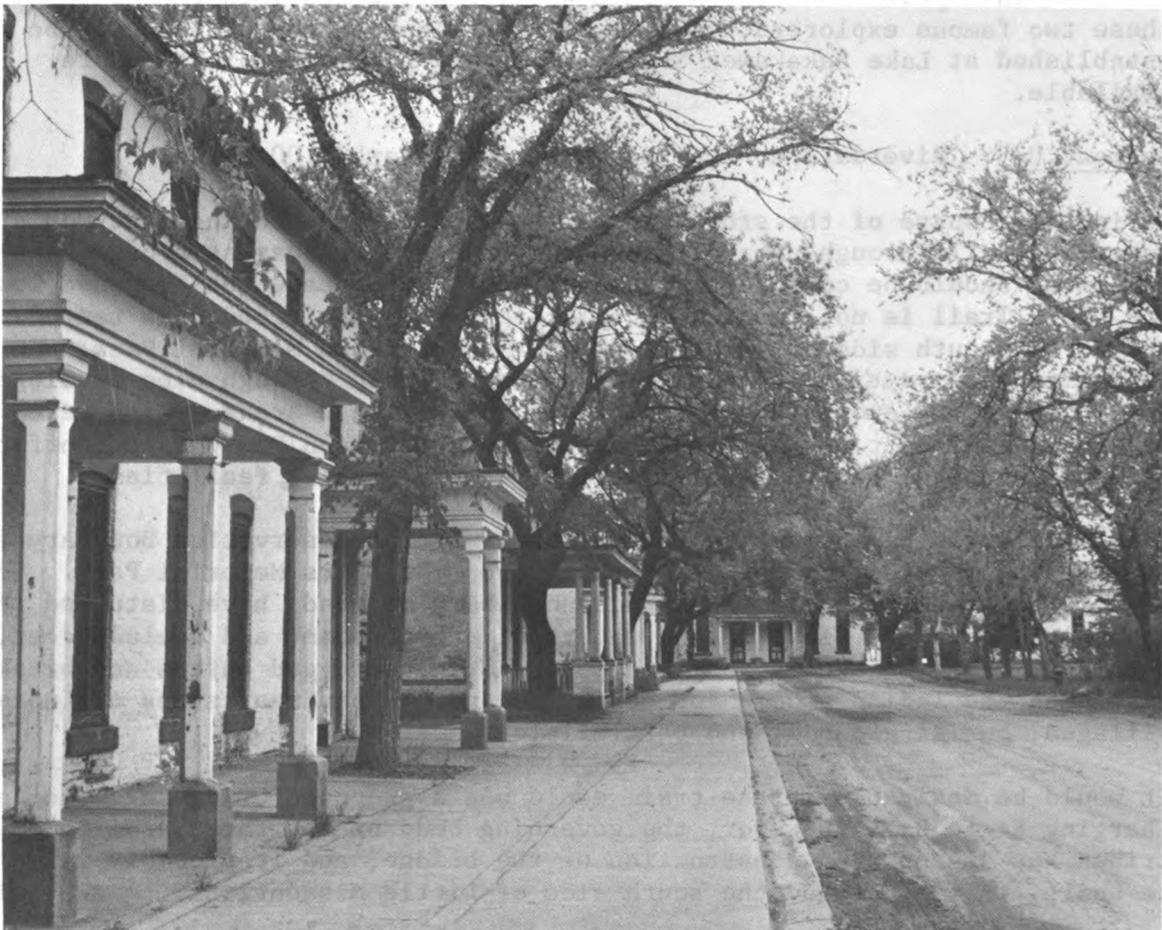
After leaving the Sheyenne River the trail would traverse the Sheyenne National Grassland, one of the last large areas of tall grass prairie in North Dakota.



Historic trails are commemorated by wagon trains and horseback riders on the annual trek from Jamestown to Fort Ransom.



The North Country Trail would pass by Devil's Lake, where waterfowl such as these snow geese and blue geese may be seen.



Fort Totten, the upper midwest's best preserved military post, is a key historic site in the Fort Totten Indian Reservation at Devil's Lake.

by means of a canal nine miles long. Current plans are for an initial development of four recreation areas on 1,750 acres of land adjacent to Devils Lake and one recreation area of 400 acres adjacent to Stump Lake.

Proceeding south from Fort Totten at Devils Lake, the trail would again connect with the Sheyenne River and follow its westerly course to Sheyenne Lake and the site of the Lonetree Reservoir south of Harvey, North Dakota. This reservoir is scheduled for construction by the Bureau of Reclamation as part of the Garrison Diversion Unit. There are two recreation areas proposed by the Bureau of Reclamation as a part of the project.

From the Lonetree Reservoir the trail would follow portions of the McClusky Canal, skirt Turtle Lake, and arrive at Lake Audubon. This area is the site of the Lake Audubon National Wildlife Refuge, Mallard Island Game Management Area, and the Riverdale Game Management Area.

Near Riverdale, the trail would arrive at the Missouri River and the location of the Garrison Dam which creates Lake Sakakawea*. The Missouri was followed by many on their way to regions further west. Its waters bore the boat of Lewis and Clark to and from their Pacific Coast expedition, and it is at this point that the North Country Trail would join the trail of these two famous explorers. The western terminus of the trail could be established at Lake Sakakawea State Park where camping facilities are available.

Segment U-V. Riverdale to Four Bears Memorial Park (100 miles)

During the course of the study, it was decided that a routing that would take the trail through some of the scenic and historic areas around Lake Sakakawea should be considered as an alternative in case the proposed Lewis and Clark Trail is not located in this area. The trail could be routed around the south side of Lake Sakakawea to Four Bears Memorial Park. In following this routing, the traveler would be taken through nine developed public use areas along the shores of the lake. These areas, which were developed as a part of the Corps of Engineers Garrison Dam project, offer camping, boating, water-skiing, picnicking, and fishing facilities.

The trail would be inside the Fort Berthold Indian Reservation Boundary for much of its length from Beaver Creek Bay to Four Bears Memorial Park. South of Lake Sakakawea is an area of badlands where no roads have disturbed the natural landscape. Wildlife and waterfowl are abundant and include deer, antelope, ducks, geese, swans, and pelicans. The rugged buttes and breaks have been the Indian's home for centuries and contain many sites of Indian villages, burial grounds, and battlefields.

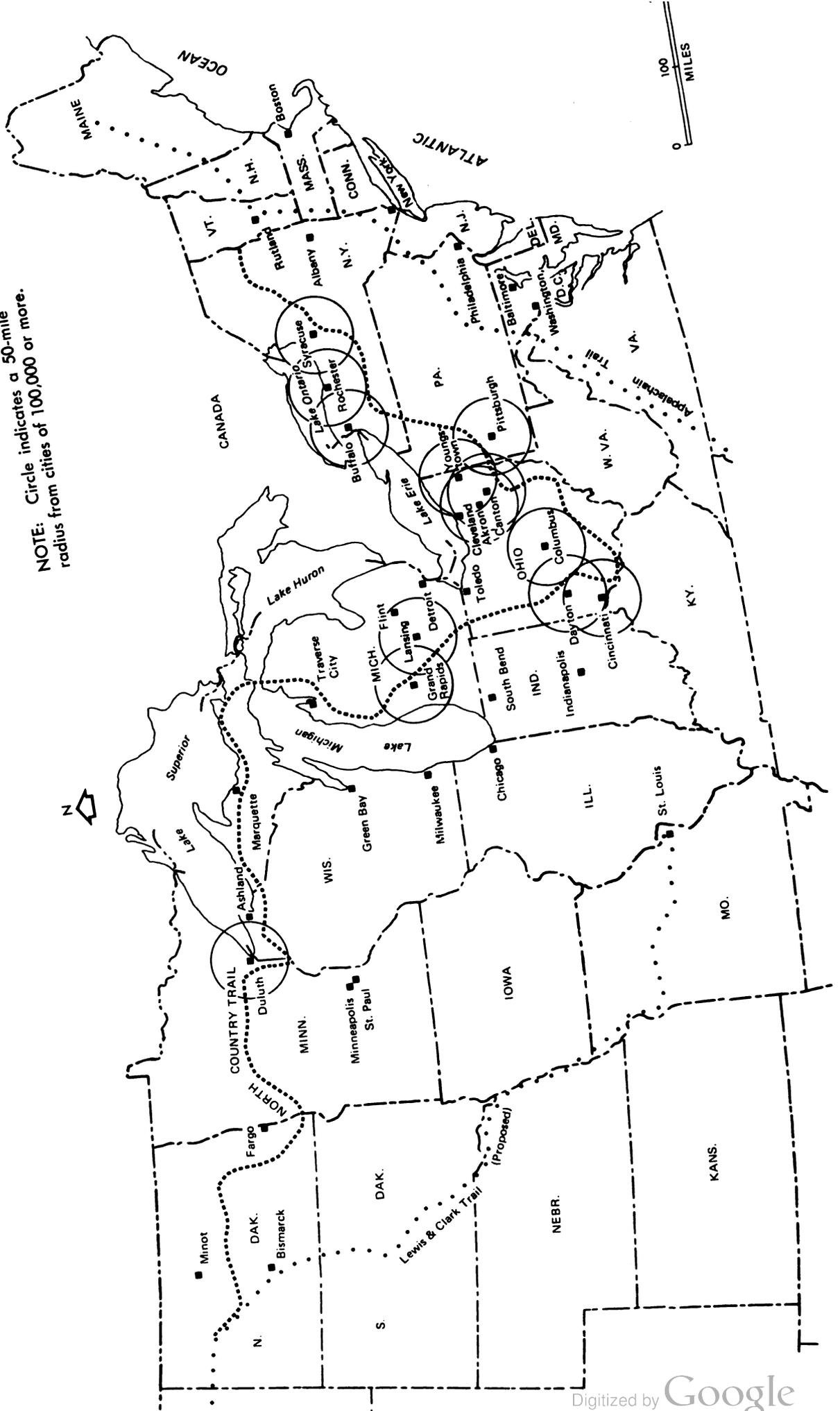
It would be desirable if the trail could use a proposed bridge crossing at Charging Eagle Bay. However, the governing body of the three affiliated tribes has disapproved construction of the bridge, and it probably will not be built. A loop around the south side of Little Missouri Bay to the bridge

*Often spelled and pronounced "Sakajawea."

crossing at Lost Bridge Public Use Area would be a suitable alternative. This would provide access for a future connection with such attractions as the Theodore Roosevelt National Memorial Park, the Little Missouri National Grasslands, and North Dakota Badlands, as well as the Killdeer Battlefield Historic site, an old Indian battlefield. Amid various scenic, historical, and archeological areas of interest, the trail would make contact with five public use areas enroute to Four Bears Memorial Park, the destination of the North Country Trail.

PROPOSED
NORTH COUNTRY TRAIL
POPULATION CENTERS

NOTE: Circle indicates a 50-mile radius from cities of 100,000 or more.



C. Population

The eight-state area contains large concentrations of populations with related urban development. Such major metropolitan areas as New York City, Pittsburgh, Cleveland, Cincinnati, Detroit, Chicago, and Minneapolis-St. Paul are located within the region and are within about 200 miles of the proposed trail corridor.

In 1970 approximately one-half of the Nation's population, 100,000,000 people, inhabited an area within 300 miles of the proposed trail. Based on the 1970 census, approximately 23 million people live within 50 miles of the trail route and almost 47 million live within 100 miles. Fourteen cities with a population of 100,000 or more are located within 50 miles of the proposed project.

D. Landownership

The route of the North Country Trail would utilize public lands for 46 percent of the trail with 51 percent in private ownership and the remaining three percent on Indian lands. Public ownership within the proposed corridor is formed in almost contiguous blocks primarily within forests, parks, game management, and wildlife areas which are well distributed along most of the proposed trail route. All but three of the 104 miles of the trail located on Indian lands would be in North Dakota.

In the States of New York, Pennsylvania, Wisconsin, and Minnesota better than half the trail would be located on public lands. Slightly less than 49 percent of the trail in Michigan would be on public land. North Dakota would have approximately 30 percent in public ownership, and Ohio and Vermont would each have about 25 percent.

In Ohio, the proposed trail would follow parts of the Little Miami River and Little Beaver Creek. The Little Miami River was designated a component of the National Wild and Scenic Rivers System in August 1973, under State administration. Little Beaver Creek is likely to be added to the National System and already has been designated a State wild and scenic river.

As the State acquires land and easements within these two river valleys, the amount of the trail corridor which would be in public ownership or easement would increase by about three percent or some 100 miles.

There are many rivers in other States that have potential for inclusion in State wild and scenic river programs. In general, potential exists to utilize public ownership for more than half of the trail if the various acquisition programs being carried on by Federal, State, and local agencies for recreational purposes are considered.

E. Land Use

Although the North Country Trail would be well within reach of one half of the Nation's people, many of the populated areas can be avoided. Out of 3,246 miles of the trail route only an estimated 166 miles (five

Table IV

ESTIMATED LANDOWNERSHIP BY STATE
Proposed North Country Trail

OWNERSHIP	Vermont		New York		Penn.		Ohio		Michigan		Wisconsin		Minnesota		North Dakota		Total		
	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%	
Federal																			
Forest Service	14	26	2	--	75	39	13	2	160	20	59	34	34 ^{1/2}	9	14	3	371	12	
National Park Service									36	5	11	6					47	2	
Corps of Engineers															38	8	38	1	
Bureau of Reclamation															72	14	72	2	
Fish and Wildlife Service													14	4			14	--	
State & Local Public			306	55	26	13	140	24	191	24	70	40	181	46	24	5	938	29	
Private	40	74	237	44	93	48	439	74	406	51	36	20	160	41	251	50	1,662	51	
Indian Reservation			3	1											101	20	104	3	
TOTAL																			
Total Miles	54		548		194		592		793		176		389		500		3,246		
% of Total	2		17		6		18		25		5		12		15		100		

1/ Miles of trail crossing nonfederal lands within the Leech Lake Indian Reservation boundary have been included under private ownership.

percent) are considered urbanized or developed. In contrast, 1,966 miles (61 percent) are forested, with recreation and forestry the main uses. Agricultural lands and other open land areas such as the prairies and badlands of North Dakota are found along 1,114 miles (34 percent).

The urbanized or developed category of land use includes strip mining and gas and oil exploration which is located along the Pennsylvania and eastern Ohio portions of the trail. While these activities are expected to continue, it is hoped that existing and proposed laws will do much to lessen impacts of these activities. Residential and other development is found along those sections of the trail which are close to existing communities and is expected to continue as communities grow. The continued development of vacation homes will probably be a major competitor for land as the trail passes through some of the choicest areas for this purpose, such as on the Ohio River and the shorelines of Lake Michigan and Lake Superior.

Areas like the Adirondack Mountains, the Allegheny Plateau, southern Ohio, the northern part of Michigan's lower peninsula, Michigan's upper peninsula, Wisconsin, and the eastern two-thirds of Minnesota contain much land which is heavily forested. Most of this land is in public ownership, and the type of land use is not expected to change. Because of forest management practices, however, the condition of the land may vary from forested to logged to newly planted. Land use changes probably will occur in those areas where privately owned forest land is intermixed with other land uses, particularly near existing communities.

Major agricultural sections of the proposed trail route are found in the middle part of New York, western Ohio, southern Michigan, western Minnesota, and most of North Dakota. The use varies from crops to livestock to a mixture. Along these sections, forest cover is largely limited to scattered woodlots and along stream banks. It is not expected that present agricultural use will change considerable except for outward urban expansion near the existing communities.

Some of the land uses in urban and developed areas along the proposed trail corridor can be considered environmental intrusions. Physical intrusions which present an obstacle to travel as well as affecting the senses include highways, residential developments, industrial developments, strip mines, and oil fields. Other uses which are offensive from an aesthetic standpoint include signs, junkyards, pollution of streams and lakes, and misuse of existing recreation areas. Some land uses result in noise intrusions or air pollution which could disturb or destroy the user's enjoyment of the trail. Disturbing noise may result from highway traffic, heavy industry, blasting, construction, and aircraft. Air pollution may result from debris burning, garbage dumps, asphalt plants, and pulp mills.

Flexible as the corridor concept is, there will be sections where the trail must pass through developed areas. In these instances, what is considered an intrusion in one place becomes part of the trail environment in another and would not be classified as an intrusion. The most foreseeable shift in land use is the continued growth of random and uncontrolled residential and vacation homes.

TABLE V

MAJOR LAND USES

Proposed North Country Trail

	Mileage	Forest ^{1/}		Agriculture ^{1/}		Other ^{1/}	
		Miles	%	Miles	%	Miles	%
Total	3,246	1,966	61	1,114	34	166	5
Vermont	54	35	65	16	30	3	5
New York	548	340	62	137	25	71	13
Pennsylvania	194	161	83	13	7	20	10
Ohio	592	299	50	259	44	34	6
Michigan	793	542	69	226	28	25	3
Wisconsin	176	160	91	16	9	--	--
Minnesota	389	293	75	93	24	3	1
North Dakota	500	136	27	354 ^{2/}	71	10	2

^{1/} Based on the estimated number of trail miles traversing a 40-acre unit. To be forested, a 40 must have a scattering of trees whose crowns cover at least 20 percent of the area. A 40 in which the dominant land use consists of land which has been tilled or harvested and/or grazed and/or is abandoned farmland is termed agriculture. A 40 in which the dominant use is other than forest or agriculture, such as residential development, strip mines, gravel pits, etc., is termed other.

^{2/} 62 miles (2%) involve scenic land formations and badlands.

F. Probable Future Environment Without the Proposal

Present uses of the trail corridor as shown in Table 5 are predominantly agriculture and forest. These uses are expected to continue with or without the project. There is a trend toward urban expansion and continued growth of residential and vacation homes in scenic areas. With or without the proposal, this trend is expected to continue. The elements of control and environmental safeguards inherent in a 200-foot wide "green strip" that the trail would provide would be lacking without the project. Thus, an overall loss of open space, wildlife habitat, and public recreation opportunity would occur, particularly in scenic and urban fringe areas.

The environment of public lands is expected to remain substantially in its present condition.

III. The Environmental Impact of the Proposed Action

Impacts are caused by acquisition and development of the trail and by recreational use of the trail once it is developed. Actual impacts depend on a number of variables such as the actual tread location, extent of acquisition, extent of development, and types and amount of use of the trail. These variables cannot be determined at the present time.

A. Impact on Vegetation

The trail would protect most of the existing vegetation within the average 200-foot wide buffer area. Tread location and overnight facility development would require the selected removal and/or trimming of shrubs and trees for clearance purposes. If existing trails are utilized, about 2,900 miles of new trail would be required. Of this, approximately 1,700 miles would go through land categorized as forest.

Using the standards suggested on page 6, it is estimated that about 625 acres of vegetation might be removed for a foot trail and overnight facility construction on the forested portions of the trail corridor.* Vegetation removal would generally be confined to brush and saplings, since a foot trail could be routed around mature trees. Some mature trees may have to be removed for the construction of overnight shelters and access sites. Some access points would require the provision of parking facilities, which could result in vegetation removal. Use of the trail by horses or snowmobiles would require additional vegetation removal for wider trails, corrals, and trailer parking. Trail users often deplete the supply of firewood, fallen logs, decaying vegetation, and other soil building materials near campsite and shelter areas. The utilization of abandoned railroad rights-of-way and more than 300 miles of existing trails should reduce the potential amount of vegetation which could be removed or otherwise impacted.

Open areas such as grasslands or sand dunes would not require vegetation removal, though intensive use could destroy the vegetative cover. Impacts are expected to be local and of minor significance.

B. Impact on Soils

Impact on soils depends on the type of soil, terrain, and the type and degree of use. With vegetation removal comes the potential for soil erosion, especially on hilly areas. Use of the trail, particularly intensive use, would cause soil compaction along the trail tread and around overnight facilities. Some soil would be disrupted by facilities and parking areas. Impacts are expected to be local and of minor significance.

C. Impact on Air and Water Quality

Impact on air and water quality would depend on the type and intensity of use. Trail and facility construction could lead to some sedimentation of

*Estimate based on a three-foot wide tread clearance and a 50' x 50' shelter area every eight miles along 1,700 miles of trail on forested lands.

streams. Facilities and parking areas would contribute to increased impervious areas and concomitant increase in runoff. Intensive use, particularly by horses, could lead to problems of organic waste disposal. Accumulations of organic waste could infiltrate local streams and water bodies. In general, the trail would maintain vegetation on the 200-foot buffer area, thus protecting an area of watershed.

Stream crossings could impact water quality. Types of crossings would depend on local conditions and management decisions but could vary from stepping stones to bridges capable of supporting horses or snowmobiles. Sedimentation could accompany the construction of a crossing. The no-bridge approach could contribute sedimentation; bank erosion; and, in the case of horses, animal waste deposited in the stream.

Sanitary facilities and drinking water would be provided at overnight shelter sites. The type of facilities would depend on local conditions and management decisions. City sewer and water might be available in some places while springs and pit toilets might be utilized in primitive areas. Details on type of facilities cannot be provided at the corridor stages, thus impacts are unknown.

Other than possible odor problems related to animal waste, the construction and use of the trail should not impact air quality for trail segments designated "scenic." The possibility exists that some portions of the trail would be designated "recreational" and the use of snowmobiles permitted. Such use would cause noise and contribute exhaust emissions over a localized area. Segments designated "scenic" would prohibit the use of motorized vehicles, thus avoiding problems of mechanical noise and exhaust emissions. Motor vehicles used to transport trail users to trail access areas would also emit exhaust and noise. Impacts are expected to be local and of minor significance.

D. Impact on Fish and Wildlife

The project is not expected to have any significant impact on aquatic organisms. Removal of vegetation for trail and facility construction would constitute a loss of wildlife habitat. Use of the trail may disturb wildlife adjacent to the trail. The trail and buffer area would protect habitat which might otherwise be destroyed by other uses such as housing developments, logging, and mining and could provide "edge" which would be beneficial to wildlife. The trail could open up formerly inaccessible areas to hunting and fishing. Impacts on the fish and wildlife resources would result from increased use which could result in overuse. This could be expected to occur on a local basis near population centers and where road access to the trail is plentiful. Impact on the fish and game resource would be greater where the trail is open to snowmobiles, since this would make hunting and fishing areas more accessible. Overall impact is expected to be local and of minor significance. The impact of the proposal on the fish and wildlife resource is expected to be favorable due to habitat protection.

E. Impacts on Scenic Qualities

Scenic areas acquired in fee, easement, or agreement would be protected from uncontrolled or unwise development. Scenic areas would be made available for viewing by the public. Local zoning ordinances enacted in relation to the trail could also protect scenic views. Impacts are expected to be significant

from a protective standpoint. If not adequately managed, overuse of scenic areas could adversely affect the aesthetic and the recreational experience.

F. Impact on Historical and Cultural Features

It is proposed that the Secretary of the Interior, with advice and consultation with the Secretary of Agriculture and the national trail council, coordinate the selection of a trail route within the recommended corridor. A survey of historical, archeological, and cultural resources would be required as part of the route selection process in order to avoid adverse impacts on those resources.

Some areas of archeological and historical significance would become accessible to the trail user, either directly or by a side trail. Acquisition of sites not now in public ownership could protect them from destruction. Visitor use of such areas can have adverse effects such as overuse, vandalism, and theft. The decision as to which areas within the corridor should be bypassed altogether will be made by the trail administrator in coordination with the State and national trail councils. As trail segments are established, the National Register of Historic Places and the State Liaison Officers for Historic Preservation will be consulted with regard to cultural, historic, and archeologic resources.

The National Register of Historical Places (Federal Register, February 4, 1975, V. 40, #24) has been consulted and 36 listed sites located near the possible trail route described in Section II and 42 additional sites located within five miles of the possible route. Nine of the sites have been designated National Historic Landmarks; six of these are along or near the possible trail route (Appendix C).

With the exception of the Adirondack Forest Preserve (Essex, Hamilton, and Herkimer Counties, New York), the trail can be located to avoid sites listed in the Historic Register. A corridor route through the Adirondack Forest Preserve was planned with the assistance of the Adirondack Park Agency and the New York Department of Environmental Conservation. Comment No. 3, p. 181, from the Adirondack Park Agency indicates that a route through the southern Adirondacks could have a beneficial impact on the park since it would help to alleviate overuse in the High Peaks area.

The Historic Preservation Officers have been contacted (excluding Vermont), informed of the conceptual nature of the trail proposal, and assured that they will be contacted again if the concept is authorized by Congress.

When properties listed or eligible for listing in the National Register of Historic Places are affected by the project, the procedures established by the Advisory Council on Historic Preservation for compliance with the requirements of Section 106 of the National Historic Preservation Act (80 Stat. 915) and Executive Order 11593 (May 13, 1971) would be observed. Impacts are expected to be significant from a protective standpoint.

The National Park Service has supplied a supplementary list of registered Natural Landmarks and study sites along the possible trail route (see National Park Service comment, pages 151-153).

G. Impact on Recreation

The proposed trail would provide a recreational facility for activities such as hiking and walking for pleasure and, where compatible, horseback riding,

bicycling, and snowmobiling. Based on 1970 census and 1965 participation rates, the annual demand for hiking originating within 100 miles of the trail was 28 million visits. The demand for walking for pleasure within a 50-mile radius was 245.6 million visits. If the North Country Trail had been in existence in 1970, it could have satisfied 19 percent of this demand for hiking and 11 percent of the demand for walking for pleasure.

Approximately one-third of the trail, about 900 miles, would be located within 50 miles of 14 cities which had a 1970 population of 100,000 or more. The trail segments comprising this 900 miles would provide a recreational facility in proximity to heavily populated areas.

To introduce an element of recreational flexibility, the report recommends that the Secretary of the Interior be empowered to designate some sections of the trail as "recreational" if application were made. Such designation could permit the use of snowmobiles where trail utilization for snowshoeing, cross-country skiing, and hiking was low. Thus, additional opportunities for snowmobiling could be provided by the North Country Trail. At the same time, use of snowmobiles could conflict with other winter uses of the trail. Snowmobiling tends to be a preemptive use. Snowmobiles present a safety hazard to slower moving hikers or cross-country skiers. Snowmobile use causes bumps or moguls in the trail and can cause melting and icing of the trail creating trail conditions unsafe for other activities. The noise of snowmobiles can also adversely affect the recreational experience of the nonsnowmobiler. Thus, where demand for these other winter uses is high, snowmobiling should not be permitted.

While, where suitable, snowmobiles might be permitted on recreational trail segments, the Secretary's report recommends that other motorized vehicles such as motorcycles and trail bikes be prohibited from using any portion of the North Country Trail. The use of these vehicles is preemptive and occurs during the main hiking season. The use of these vehicles is not permitted on national scenic trails by P. L. 90-543, and their use on recreation trail segments of the North Country Trail is not recommended because of the conflicts with hikers, equestrians, and bicyclists.

The possible route for the North Country Trail as discussed in Section II, B. suggests the use of an existing 337 miles of trails. Hiking is the predominant use of these trails. Snowmobiles are permitted in sections of the towpath trail in Old Erie Canal State Park and on the "North Country Trail" in the Chequamegon National Forest.* No other kind of motorized use is allowed on the 337 miles. The use of snowmobiles would no longer be permitted under scenic status, removing a recreational opportunity presently pursued by some persons. Where demand for such use is high, the report recommends that separate trails specifically for motorized vehicle use, including snowmobiles, be provided.

It is assumed that some portions of the trail would sustain or provide access for fishing and hunting where permitted by the land managing agency. In areas where there has been no previous public access, the trail could provide hunting and fishing opportunities. Impacts on the fish and wildlife resource would depend on the intensity of use. Conflicts between hunters and hikers could occur.

*A portion of the existing "North Country Trail" traverses the recently designated Rainbow Lake Wilderness Area. Scenic trail designation would not reduce recreational opportunities for snowmobiles on this portion since the use of motorized vehicles is prohibited in wilderness areas.

By providing an additional facility or alternate form of recreation, the North Country Trail may serve to lessen crowding or overuse in existing recreation areas.

H. Impact on Land Use

The proposed trail would have little impact on existing land use. An estimated 61 percent of the possible trail route would be in forested areas and 34 percent in agriculture. The remaining five percent is through developed lands, such as urban and industrial areas.

The trail would cross public lands, generally classed in the forested category, which sustain recreational use. The construction of the North Country Trail would provide an additional recreational facility in keeping with the general recreational land use. Approximately 340 miles of existing trails could be incorporated into the North Country Trail. On lands which currently do not sustain recreational use, the proposal would introduce such use.

Selection of the trail right-of-way would give full consideration to minimizing the adverse effects upon the adjacent landowner or user and his operation. The trail would not traverse fields in production but follow farm boundaries where possible. Losses of agricultural production, therefore, would be negligible. Easements and agreements usually require restrictions on landowners with respect to property use. Such activity as mineral extraction and logging within the trail right-of-way or perhaps within view of the trail could be curtailed. In wooded areas that are managed for forest production, active commercial logging should be curtailed within the trail right-of-way. Figures on the amount of land managed for commercial timber will not be available until a route is selected. While commercial harvest is not recommended, forest management practices such as the removal of diseased or hazardous trees or trimming to open up a scenic view would be in accord with trail purposes. Scenic easements and zoning could also restrict the uses of land adjacent to the trail.

Other than at the right-of-way and scenic easement areas, land use in the immediate area could undergo changes toward trail-related development such as equipment stores, eating establishments, motels, and recreation real estate. Most of these developments probably would occur in existing urban areas, small towns, and near access points which involved major highways. Recreation real estate could occur on any private land. The proximity of the Appalachian Trail and the Buckeye Trail (in Ohio) has been used by real estate firms to sell property. Cabins or other recreational development soon follows. The ultimate impact of such development varies but generally involves clearing of a portion of the land, erosion and sedimentation during construction, possible water supply and waste problems, and possibly a degradation of the recreational experience of those using the trail. Development can also cause increasing land values which makes acquisition for trail right-of-way more expensive.

Acquisition of sufficient right-of-way, scenic easements, agreements with landowners, zoning, and land use planning can avoid or reduce impacts from trail-related development. These measures can be recommended by the proposal, but local governments must implement them on their own initiative.

The proposed action is not expected to materially impact present land management policies. The design, operation, and maintenance of the trail would be done in a manner consistent with and requiring little or no alteration of the management objectives on either public or private lands.

No alteration in multiple-use plans for Federal lands along the trail routes is recommended. This is in accordance with Section 7(a) of the National Trails System Act which states:

"Development and maintenance of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple-use plans for that specific area in order to assure continued maximum benefits from the land."

To further this principle as it applies to nonfederal lands, the trail and buffer area need not be fenced except where presented as an expressed condition in the acquisition of rights-of-way. Existing land uses within the trail right-of-way should not be subject to alteration except for reasons of public safety or as a convenience to the adjacent landowner.

When the trail crosses ecologically fragile lands, such as sand dunes or wetlands or lands being protected within units of the National Park System, Wildlife Refuge, or Wild and Scenic Rivers System, the land administering agencies will retain authority to curtail any trail use which might impair or damage natural values or the values for which those lands were being protected. The lands involved would continue to be subject to the provisions of the legislation under which such areas were established. In the event of conflicting policy, should such occur, that with the most restrictive provisions will apply.

I. Impact on Landownership

Forty-six percent of the North Country Trail would be on existing public land, 51 percent on private land, and 3 percent on Indian lands. It is estimated that about 22,700 acres would be acquired in fee title by public agencies. This varies from less than 600 acres in Vermont to over 6,000 acres in Ohio. Because of the linear nature of the trail, the amount of land acquisition affecting any one landowner is expected to be minimal. The remaining land would be controlled via easements or agreements; thus, ownership would remain the same.

J. Impact on Local Economy

Economic impacts of the North Country Trail are expected to be mainly of local significance. An estimated 22,700 acres will be acquired in fee and an additional 10,300 acres in easement. Thus, about 22,700 acres would be removed from the tax base (refer to Table II for State-by-State breakdown). Easements, agreements, and zoning which would limit the kinds of land use on the remaining right-of-way could result in a partial loss of taxes.

Adverse effects of the trail on the local tax base should be minimal with less than 25 acres per mile removed from the tax rolls. Land acquired would be predominantly from those in forestry and agricultural use which generally have a lower tax assessment when compared with urban, industrial, or other intensively developed lands. It is estimated that 61 percent of

the trail route would be in forested areas with 34 percent in agriculture. Some economic activities such as logging and mineral excavation within the trail right-of-way would probably be prohibited, thus reducing potential economic gain from these activities.

Direct Federal acquisition would be limited to lands within U. S. Forest Service proclamation boundaries. While the Forest Service has prior authority to acquire this land, the North Country Trail proposal could hasten the acquisition. Such acquisition would reduce the local tax base. By law, the Forest Service distributes 25 percent of all receipts from National Forest lands to the counties on the basis of the number of acres of National Forest land per county. These funds must be used for schools and roads.

Economic activity could be created or expanded through expenditures for land acquisition and development of the trail. Although these would be one-time expenditures, a capital investment of 32 million dollars is substantial. The operating costs for the trail of \$443,000 a year would be on a continuing yearly basis and involve approximately 170-man years of employment (Table VI).

The trail would probably generate the development of recreation-related businesses such as equipment stores, eating establishments, motels, and recreational real estate. Economic benefits occurring from such development would include increased employment opportunities, expenditures for goods and services by recreationists, and an increase in the local and State tax base. Such development, however, could contribute to a degradation of the trail experience for some users.

K. Impact on Highways and Utility Lines.

The proposed North Country Trail should not affect existing highways or utility lines. On-ground location of the trail tread would generally incorporate existing overpasses over major highways and should consider future plans for highways, utility lines, pipelines, and other rights-of-way. In the event that a segment of designated trail and right-of-way is subsequently required by Federal-aid transportation projects, Section 4(f) of the Department of Transportation Act of 1966, as amended, which prohibits the use of public recreation lands for Federally aided transportation projects unless no feasible and prudent alternative exists, may apply.

Sections of the trail acquired or developed with Land and Water Conservation Fund monies would be subject to Section 6(f) of that Act, which restricts changes in use unless approved by the Secretary of the Interior. Such legal requirements could affect the location of developments such as highways, airports, and utility lines.

Trail intersections with highways could pose safety hazards to trail users and could cause temporary disruption of traffic flow. Where impractical to use existing overpasses, pedestrian overpasses or underpasses would have to be built for high volume highways and interstates. Some disruption of traffic could occur during construction of pedestrian crossings. Use of trail

TABLE VI
Estimated Man-Years of Employment
at Optimum Development*

	<u>Maintenance</u>	<u>Administration</u>	<u>Total</u>
Federal			
U. S. Forest Service	15.0	5.0	20.0
National Park Service	2.0	1.0	3.0
Bureau of Reclamation	3.0	1.0	4.0
Corps of Engineers	1.5	0.5	2.0
Fish and Wildlife Service	0.5	---	0.5
Total Federal	22.0	7.5	29.5
Nonfederal			
Vermont	1.5	0.5	2.0
New York	22.0	7.0	29.0
Pennsylvania	4.5	1.5	6.0
Ohio	23.0	7.5	30.5
Michigan	24.0	8.0	32.0
Wisconsin	4.0	1.5	5.5
Minnesota	13.5	4.5	18.0
North Dakota	15.0	5.0	20.0
Total Nonfederal	107.5	35.5	143.0
Total Federal and Nonfederal	129.5	43.0	172.5

*Assuming one man-year per 25 miles of trail annually for maintenance, and one man-year per 75 miles of trail for administration. (Figures are rounded to nearest half-man year.)

segments by horses, bicycles, and snowmobiles could also present a hazard to motorists if the trail user is careless at crossings. There is additional hazard in the case of snowmobile use of the highway itself.

The use of the trail would generate additional traffic. Logically, traffic would be heavier near the urban areas and major access points. A secondary impact of the trail is the opportunity to spend a vacation hiking or biking instead of long-distance driving. Thus, the trail has the potential of reducing traffic as well as generating it.

L. Impact Related to Visitor Use

Visitor use of the trail would vary in impact on the environment depending on the intensity of use, particularly in relation to environmental conditions of the trail itself.

Intensive use of trail facilities could cause problems of accumulation of human waste. Segments of the trail on which horseback riding might be permitted could also sustain problems of soil compaction and accumulation of animal waste.

Intensity of visitor use would depend on nearness to population centers, accessibility of the trail, proximity to established recreation areas, attractiveness and subsequent popularity of trail segments, and length of trail use season. Some sections of the trail would withstand use better than others. For example, steep hills, fragile marshes, dunes, and areas with a short summer and hence short regenerative season could not withstand intensive use.

It is assumed that those segments of the trail near population centers would receive the heaviest use, particularly the more than 900 miles of the possible route which would be within 50 miles of cities having 100,000 population or more. It is assumed that the creation of a national trail and subsequent publicity would encourage use.

At some locations, the trail would provide access to other recreation areas or facilities, such as wild and scenic rivers, trails, parks, and historic sites. This could cause overuse of the existing areas. Locally, impacts would be severe where use is already heavy, such as on the Long Trail in Vermont. The North Country Trail could also serve to siphon off some of this excessive use by giving the recreationists somewhere else to go. The location of the North Country Trail south of the High Peaks area of the Adirondacks is expected to relieve some of the heavy hiking pressure which the High Peaks currently sustains.

With national scenic trail designation, the use of motor vehicles will not be permitted. The absence of such vehicles as motorcycles, trail bikes, ATV's, and snowmobiles would avoid exhaust emissions, noise, and other environmental and use problems associated with these vehicles. Some means of motorized transportation would be required in most instances to reach trail access points. Use of the trail itself would not require gasoline. Trail sections designated as "recreational" could sustain use by snowmobiles. The North Country Trail report recommends against the use of other motorized vehicles on recreation trails.

The administering agency will need access to the trail for servicing. The means of servicing will depend on local conditions. On primitive trail segments, this might require backpacking materials in or out, while service vehicles might be used on trails developed on abandoned railroad rights-of-way.

Littering and vandalism probably will occur as a result of recreational use. This is expected to be most severe near cities and at areas of intensive day use. Also, some inadvertent or deliberate use of the trail by motorized vehicles probably will occur. The extent of such use and its impact would depend on trail management and maintenance.

Antisocial and/or illegal acts will require the enforcement of rules and regulations. This is an understood part of management. However, in some areas the managing agency may not be able to adequately handle problems, resulting in the need for additional police support.

M. Impacts of Use on Other Trails (Appalachian Trail, Adirondacks)

Some portions of the Appalachian Trail have suffered from excessive use. In some areas, the trail has been deepened by erosion and widened as hikers attempt to walk around a muddy spot. Vandalism and littering have occurred. Where the trail crosses private land, the failure to close gates and use of firearms have caused some loss of livestock. Trail markers and signs have been used for target practice or removed by souvenir hunters. The presence of the Appalachian Trail has been used by real estate developers to sell recreation property, with subsequent cottage development.

The physical impact of trail use becomes more severe in fragile alpine areas such as the Adirondack High Country. Steep slopes, thin or unstable soils, and large quantities of run-off contribute to severe erosion when disturbed by trails. Alpine vegetation and inverted bogs on the mountain peaks have been destroyed by hikers.* The avoidance of these impacts is one reason why the North Country Trail corridor was located in the southern part of the Adirondacks where the terrain is less mountainous.

*"The Impact of Man on the Adirondack High Country," by E. H. Ketchlodge and R. E. Leonard, The Conservationist, October-November 1970, pp. 14-18.

IV. Mitigating Measures Included in the Proposed Action

Most mitigating measures consist of trail standards recommended in the report. Limited clearance of vegetation, use of gentle grades and switchbacks, and use of tread surface covering material all serve to reduce potential erosion. The accent on minimal facilities of rustic design serves to reduce loss of wildlife habitat and maintain the natural aspects of the trail environment. They would be spaced so as to minimize or avoid congestion, overuse, and adverse impact. Control devices which would limit or exclude some conflicting or prohibited use can be inobtrusively placed and made a part of the trail design. Stiles or labyrinth gateways along fenced areas or narrow gorges are examples.

The suggested alignment of the proposed trail could use approximately 340 miles of existing trailways, thereby avoiding new construction. Where necessary, these existing trails will be upgraded, operated, and maintained to proper standards consistent with environmental concerns. Existing camping facilities found in the parks and forests along the trail also could be used, reducing the need for additional facilities specifically for the trail.

State trail councils would be established so that detailed trail planning and management would be accomplished at the State level, with a national council as overall coordinator. Local units of government, private organizations, and interested citizens would work with the appropriate State council to accomplish tread location, management, and maintenance. These councils would serve as focal points where citizens interested in possible adverse environmental impact might address their concerns and where action would be taken to mitigate any possible adverse impacts.

During the route selection stage, the national and State trails councils would be responsible for overseeing consultation with the State Liaison Officers for Historic Preservation and the National Register for Historic Places and compliance with Section 106 of the National Preservation Act and Executive Order 11593.

Trail designation would be consistent with the established land management policies for the protection of wilderness, primitive, and natural lands. No provisions of legislation establishing the North Country Trail will affect the provisions of those acts establishing the national wilderness preservation system, national parks, national forests, and national wildlife refuges. The most restrictive provisions determined by the land managing agencies to be appropriate will apply. Land managing agencies will retain authority to curtail or eliminate any trail use inconsistent with the protection of environmental values. In this regard, trail designation will not restrict the prerogatives of the land managing agencies concerned with protection of natural areas.

The utilization of overpasses across major highways and interstates should eliminate safety hazards to trail users. The trail would probably be routed so as to use existing overpasses. Pedestrian overpasses or underpasses may be required in some places. Warning signs, both on the trail and along the highways, would be required for local road crossings.

The corridor concept itself permits the careful location of the actual trail tread based on actual site conditions. The deliberate avoidance of ecologically fragile areas is an essential part of tread location. Adverse effects of overuse and misuse can be mitigated by the trail administrator through trail planning and management in accord with the recommended standards.

Since the corridor concept allows for a trail location which could avoid homes and businesses, it is not expected that any persons would be displaced by the project. However, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Public Law 91-646) applies to this proposal whenever Federal monies would be involved.

Forty-six percent of the trail could be routed over existing public lands. The use of easements and agreements should minimize the reduction of the tax base.

By law, the Forest Service distributes 25 percent of all receipts from National Forest lands to the counties on the basis of the number of acres of National Forest land per county. These funds must be used for schools and roads. While this is not a substitute for the tax base, it often results in more revenue to the county, particularly in rural counties where the tax base is often very low.

The removal of firewood, logs, and other combustibles by trail users can be minimized through user education and trail management and encouraging or requiring the use of portable stoves and fuel. This would be a management decision of the administering agency and should consider the question of renewable resources (wood) vs. nonrenewable (fuel made from oil).

Possible over harvesting of fish and wildlife due to inaccessible areas being made accessible by the trail can be avoided by disallowing hunting and management techniques such as reduced limits and habitat manipulation.

The problem of litter can be minimized through a "pack it in-pack it out" policy or a "no cans or bottles" policy. This would also be up to the administering agency.

The need for parking facilities and impacts of driving to and from trail access points can be mitigated by public transportation. It is not uncommon for a backpacker to use a bus, train, or plane for the major portion of the journey to and from a trail. This eliminates the problems of leaving a personal vehicle unattended for an extended period of time. Mass transit can also be used to transport day users from urban areas and groups of trail users.

If necessary to preserve the purposes for which the trail is established or to promote a sound land management program in accordance with established multiple-use principles, the trail right-of-way could be relocated. Relocation would be a decision of the Secretary of the Interior with concurrence of the national trail council and the head of the government agency having jurisdiction over the lands involved. A substantial relocation, however, could be accomplished only by an Act of Congress.

V. Adverse Effects Which Cannot Be Avoided Should the Proposal Be Implemented

All disturbances of soil and vegetation associated with trail and facility development are considered adverse and unavoidable.

Based on approximately 1,700 miles of new trail to be constructed through wooded areas, a 50' x 50' shelter area constructed every eight miles along the 1,700 miles, and assuming a tread width of three feet, about 625 acres of vegetation could be removed. This figure is a very rough estimate and does not consider wider tread needed for snowmobiles and horses, larger shelter areas, provision of parking areas, utilization of existing overnight shelters in public lands, etc.--factors which cannot be determined at the corridor concept stage. Some vegetation will be removed, and its loss, though minor, is considered adverse.

Some adverse impacts will inevitably result from recreational use--and misuse--of the trail. Normal use and maintenance will prevent the return of vegetative cover and cause some soil compaction and disturbance to wildlife. Generally, these impacts are expected to be minor. More serious impacts would occur as a result of overuse, which is not unavoidable given proper trail management.

Some trail segments would receive heavier use than others, particularly those within easy reach of metropolitan areas. These also tend to be areas where use of abandoned railroads are possible and where heavy use may require a surfacing of the trail or restricted use in order to protect the resource. Heavy recreational use of the trail can have adverse impacts, but an attempt to delineate or quantify specific adverse impacts at this time is meaningless. Some misuse of the trail is expected. Littering, annoyance to people who live near the trail, vandalism (to private property, the trail environment, historic sites, etc.), and illegal use of motorized vehicles are the most probable.

Reductions in local tax base and restrictions on type of land use permitted within the trail right-of-way may be considered adverse in terms of local economic values and individual property owners.

VI. Relationship Between Short-Term Use of Environment and the Maintenance of Long-Term Productivity

Use of the trail is not expected to significantly affect existing land uses along the trail route. Thus, trail designation and development are not expected to affect long-term productivity of those lands or the uses thereof. Assuming proper management of the trail, long-term productivity for recreation should remain constant.

VII. Any Irreversible and Irretrievable Commitments of Resources Which Would be Involved in the Proposed Action Should it be Implemented

All financial resources, labor, and material expended for the proposal are considered irreversible and irretrievable. For all practical purposes, land designated as the North Country Trail is committed to recreational use.

VIII. Alternatives

There are two types of alternatives: alternatives for a trail project and alternate ways of administering a national trail.

A. Alternatives: Projects

1. No Action

Each State and Federal agency would continue with their present and planned trail programs, if any. Local governments and private organizations would continue with whatever trail plans they now have. Such plans would not be subject to the restrictions of a national scenic trail, such as the avoidance of highways, no motorized vehicles, etc. Monetary cost would be whatever the States planned to spend on trails, either wholly State and local or matched with Federal monies from the Land and Water Conservation Fund. Application for national recreation trails within the North Country Trail corridor could occur and trails could be so designated.

The probable impact of this alternative would be the absence of a coordinated effort to implement a trail of the type and magnitude of a national North Country Trail. Without a coordinated effort, a continuous trail is unlikely to be constructed.

Forested and agricultural lands near urban areas would continue to be converted to urban, commercial, and industrial land uses. Scenic areas would continue to be utilized as choice sites for recreational or second home development. While the proposed trail could not halt this trend, the no action alternative would result in the loss of the desirable trail environment which presently exists.

The beneficial and adverse impacts discussed in Section III would not occur with the no action alternative. It is assumed that some trails would be provided by local and State initiative, but not of the magnitude of the proposal. Those States with a low priority interest in hiking trails would probably not provide such facilities.

2. Establish the trail along other corridors.

The selection of the recommended corridor was based on the most scenic areas of each State plus the availability of public lands. No one corridor can include all points of interest within a State, thus the number of possible alternative trail routes is nearly unlimited.

Other corridors would not be as scenic. Cost of a route in other corridors would probably be higher since less public land would be available. The general impacts of constructing any trail, regardless of the corridor alignment, would be similar to those discussed for the proposed action.

There are alternate routes associated with the eastern terminus. Several options are believed to be feasible, including a connection with the Appalachian Trail in New York, Connecticut, Massachusetts, or Vermont or no

connection with the Appalachian Trail. None of these routes are recommended in the report, rather this is an issue which would be considered in future planning for the proposed trail.

3. Establish a shorter trail.

A shorter trail would result in less trail being constructed and used, thus reducing both adverse and beneficial impacts of the proposed trail. For example: fewer recreational opportunities would be available, less green space preserved, less wildlife habitat preserved, fewer cultural features would be protected and interpreted, less land would be acquired and removed from the tax base, less restrictions would be placed on potential development.

4. Establish a segmented trail.

Although desirable, it is not mandatory for the trail to be continuous. The trail could be segmented in various ways. For example, trail sections near urban areas might be eliminated; trail segments in rural and/or "wild" areas might be eliminated; or entire States could be dropped from the route.

A segmented trail would necessarily be a shorter trail, therefore the impacts of Alternative 3 would apply. In addition, persons wishing to travel the entire trail would be faced with difficulties in traversing the area between segments. Trail segments might be too short to provide a meaningful experience, especially for backpackers. Public pressure to complete the trail for a meaningful experience, would result in greater long term monetary costs.

Depending on the manner in which the trail was segmented, groups of people would be without local access to the trail segments (example: if a State were eliminated, those citizens would have to travel to another State to use the trail), all users would have less variety of experiences than would be possible under the proposal. (Example: if rural/wild areas were eliminated, these could not be experienced by the trail user.)

5. Establish a North Country National Scenic Trail.

The trail route described and illustrated in the study report was developed using national scenic trail criteria and qualifies for scenic designation. A North Country National Scenic Trail would have to be authorized and designated by an Act of the Congress and, therefore, would have a high degree of protection and assurance of establishment. Impacts of designating the entire trail as scenic would be similar to those discussed in Section III, with the exception of those relating to motorized vehicles.

In accordance with the existing criteria in Section 7(c) of the National Trails System Act, motorized vehicles are prohibited from using a national scenic trail. Recreational activities requiring motorized vehicles would have to be performed elsewhere. Since one of these activities, snowmobiling, is permitted on some existing trails which might be incorporated into the North Country Trail, national scenic trail designation could result in a loss of that type of recreational opportunity. Opportunities for hiking, walking for pleasure, horseback riding, and bicycling would increase.

Opportunities for nonmotorized vehicle trail activities would probably be greater with total national scenic trail designation because there would be less potential for conflicting and incompatible uses. The prohibition against motorized vehicles would also probably result in less damage occurring to the trail and its environment, including noise and exhaust pollution. Additional vegetation removal for the wider tread required by snowmobiles would be avoided.

Scenic trail status would provide for the highest quality recreational experience and emphasize scenic areas and remoteness. Estimated costs would be the same as those for the recommended proposal.

B. Alternatives: Administration

Two alternative methods under which the North Country Trail could be administered are discussed below. It is not intended that these suggested arrangements constitute the only possibilities, as other variations could be devised.

1. North Country Trail Conference.

Administration of the North Country Trail would be accomplished by an arrangement similar to that of the Appalachian Trail Conference. It would function through a Board of Managers, chaired by the executive director of the conference, and would be composed of the conference officers and three persons from each of the eight States through which the trail passes.

The conference would basically be a volunteer, recreational group. Labor required for conference activities and trail maintenance would be contributed by those interested in the North Country Trail project. Specifically, the trail would be built and maintained by: (1) clubs assigned a specific portion, (2) public interests (Federal, State, and local) which maintained those sections that cross their lands, (3) individuals who are made responsible for certain designated portions, and (4) clubs which support the trail by other means. While monetary cost of this method would be less than if the trail were maintained by paid staff, actual figures are not available. Because of the volunteer nature of this alternative, environmental features included in the trail standards and maintenance objections might be prohibitively expensive. In general, however, the impact of right-of-way acquisition and trail construction would be similar to that described for the proposed action.

2. Federal Administration

The Secretary of the Interior would be designated by the Congress as being responsible for the overall administration of the trail. Under this arrangement, the Federal Government would be wholly responsible for acquisition, development, and management of the trail. The portions of the trail located on various Federal lands would be managed by the appropriate Federal agency in accordance with an agreement worked out with the administering secretary. The portions of the trail which would be located on nonfederal public lands would either be donated to the Federal Government or proper administrative arrangements would be determined between the Secretary and the concerned nonfederal agency. The trail corridor on nonpublic lands would be purchased in less-than-fee whenever feasible, and State, local, and private interests would be encouraged to participate in the management of such sections of the trail.

Under this arrangement, the Secretary would establish an advisory council for the North Country Trail and consult with the council from time to time with respect to matters relating to the trail, including the selection of rights-of-way, standards for the erection and maintenance of trail markers, and the administration of the trail. Membership of the council would consist of representatives from appropriate Federal and State agencies and private organizations.

Monetary cost would initially be greater than other methods and might be borne in total by the Federal Government if individual States did not provide assistance. A continuous trail, acquired and constructed within a reasonable time span before land values increased and urban development occurred, would be possible with this method. Environmental impacts would be basically the same as those for the proposal.

IX. Consultation and Coordination with Others

A. Consultation and Coordination in the Development of the Proposal and Preparation of the Draft Environmental Statement

For the purpose of collecting data for the North Country Trail study, separate subcommittees of the field task force were established in the States through which the trail would pass. Represented on these subcommittees were the offices of concerned Federal and State agencies and various private trail interests. Preliminary drafts of the study report were reviewed by members of the Interagency Task Force on Trails.

Efforts were made throughout the study to keep the public informed and to solicit the views of citizens concerning the proposed trail. Twelve public information meetings were held and progress reports were issued on a regular basis.

Attendance at the information meetings ranged from 20 to 50; generally about 40 persons were present. The proposal presented to the public was the North Country National Scenic Trail, and, with the exception of Vermont, this proposal drew considerable support at the hearings. In Vermont, opposition was expressed by the Green Mountain Club and landowners who have had experience with heavy use of the Appalachian/Long Trail and were concerned about the rights of property owners and misuse of the trail.

Concern was expressed at other public hearings about policing of the trail and the rights of property owners. Concern over conflicts between horsemen, hikers, and bicyclists was expressed. A majority of attendees were opposed to the use of motorized vehicles on the trail. The International Snowmobile Industry Association requested that the trail be open to snowmobiles.

Information meetings were held with the tribal councils of the Fort Totten Indian Reservation and the Fort Berthold Indian Reservation. The response was favorable.

B. Coordination in the Review of the Draft Environmental Statement

Comments were requested from the following:

*Advisory Council on Historic Preservation	*Department of Transportation
*Department of Agriculture	*Environmental Protection Agency
*Department of Defense	*Federal Power Commission
U.S. Army Corps of Engineers	Water Resources Council
Department of the Interior	State Clearinghouses:
*Bureau of Indian Affairs	**Vermont
*Bureau of Land Management	**New York
*Bureau of Reclamation	*Pennsylvania
*Fish and Wildlife Service	**Ohio
*National Park Service	*Michigan
*Department of Housing & Urban Development	*Wisconsin
	*Minnesota
	**North Dakota

*Comments received and attached.

**Includes comments from more than one agency or group.

Adirondack Mountain Club, Inc.
American Conservation Association
American Forestry Association
*American Motorcycle Association
American Youth Hostels
*Appalachian Trail Conference
Bicycle Institute of America
*Buckeye Trail Association
*Finger Lakes Trail Conference
*Green Mountain Club
*International Snowmobile Industry
Association

Izaak Walton League
*Keystone Trails Association
National Trails Council
New York-New Jersey Trail
Conference
North American Trail Riders
Council
North Dakota Wildlife Federation
Inc.
Northern Environmental Council
*Ski Touring Council
Sierra Club
Wilderness Society

C. Summary of Correspondence Received Following Review of the Draft Statement

Over 40 letters were received on the draft environmental statement including letters from 15 Federal agencies, eight States, nine organizations, and eight individuals.

The draft environmental statement was circulated for review of the data presented and comment on the adequacy of the environmental analysis. Many comments went beyond this and voiced support or rejection of the proposal itself. Those persons who desire to voice a position on the proposal will have every opportunity to make their interests known through legislative channels as Congress considers the proposed legislation.

Correspondence which provided additional data or raised questions concerning the adequacy of the draft statement are followed by a response page or pages. Comments are numbered in consecutive order on each letter. The numbered responses on the pages which immediately follow each letter correspond to these numbers. Similar or identical questions were posed by more than one reviewer. In most of these cases, the comment is fully addressed the first time it appears, with following or similar comments referred to by number and comment to the first response. To facilitate this referral system, the letters are organized alphabetically in the following categories: Federal agencies; States; organizations; and individuals.

D. Summary of Changes From Draft Statement

A number of minor editorial and factual changes have been made from the draft environmental statement in response to numerous suggestions offered by Federal and State agencies as well as many private organizations and individuals.

Section I has been expanded. The description of the proposal has been revised to clearly explain both the Congressional mandate for the study and the rationale for the recommendation that snowmobiles be permitted on limited sections of the trail. Additional material has been added to the sub-sections on Satisfying Recreation Needs and Interrelationship with other Plans and Developments.

Additional material was also incorporated into Section III. This reflects new information and an attempt to be responsive to the request for a more detailed discussion of explicit impacts. However, the corridor concept of the proposed action requires that a discussion of impacts be general at this time.

E. Correspondence Received

Table VI

Index of Correspondence Received

	<u>Page</u>
FEDERAL AGENCIES	
Advisory Council on Historic Preservation.	117
Department of Agriculture	
Office of the Secretary	120
Forest Service.	127
Soil Conservation Service	130
Department of Defense	
Department of the Army, Office of the Chief of Engineers.	132
Department of the Interior	
Bureau of Indian Affairs.	135
Bureau of Land Management	142
Bureau of Reclamation	145
Fish and Wildlife Service	149
National Park Service	151
Department of Housing & Urban Development.	157
Department of Transportation	159
Environmental Protection Agency, Washington, D.C.	161
Environmental Protection Agency, Region II	164
Federal Power Commission	167
STATE AGENCIES	
Michigan	
Office of the Governor.	170
Minnesota	
Department of Natural Resources	173
New York	
Executive Chamber	175
Adirondack Park Agency.	179
North Dakota	
State Planning Division (Clearinghouse)	183
Ohio	
Department of Natural Resources	194
Environmental Protection Agency (Clearinghouse)	198
Pennsylvania	
Office of the Governor.	202
Vermont	
Office of the Governor (Clearinghouse).	204
Wisconsin	
Department of Natural Resources	219

ORGANIZATIONS	<u>Page</u>
American Motorcycle Association.	227
Appalachian Trail Conference	243
Audubon Society, Mississippi Headwaters Chapter.	246
Buckeye Trail Association.	249
Finger Lakes Trail Conference.	253
Green Mountain Club, Inc..	255
International Snowmobile Industry Association.	258
Keystone Trails Association.	262
National Campers & Hikers Association.	265
Ski Touring Council.	277

INDIVIDUALS

Scott M. Bailey.	282
John P. Bay.	285
Mr. & Mrs. Alan Hausrath	287
Timothy B. Knopp	290
Ralph E. Ramey, Director, Glen Helen	292
Carl R. Seelhoff	295
Tennessee Gas Pipeline Company	299
Harry E. Wilson.	301

**Advisory Council
On Historic Preservation**
1522 K Street N.W. Suite 430
Washington D.C. 20005

October 29, 1974

Mr. John D. Cherry
Regional Director
U.S. Department of the Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

This is in response to your request of September 3, 1974, for comments on the environmental statement for the proposed North Country Trail in the States of Vermont, New York, Pennsylvania, Ohio, Michigan, Wisconsin, Minnesota, and North Dakota. Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act of 1969, the Advisory Council on Historic Preservation has determined that while you have discussed some of the historical, architectural, and archeological aspects related to the undertaking, the Advisory Council will eventually need additional information to adequately evaluate the effects on these cultural resources. We recognize that in this early planning stage for corridor authorization, the conceptual approach that DOI has taken is appropriate. However, the Advisory Council will not be able to comment substantively on the project until it has been furnished evidence for the selected trail indicating:

- a. Compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470(f)). The Council must have evidence that the most recent listing of the National Register of Historic Places has been consulted (see Federal Register, February 19, 1974, and monthly supplements each first Tuesday thereafter) and that either of the following conditions is satisfied:
 1. If no National Register property is affected by the project, a section detailing this determination must appear in the environmental statement.
 2. If a National Register property is affected by the project, the environmental statement must contain an account of steps taken in compliance with Section 106 and a comprehensive discussion of the contemplated effects on the National Register property. (Procedures for compliance with Section 106 are detailed in the Federal Register of January 25, 1974, pp. 3366-3370).
- b. Compliance with Executive Order 11593 of May 13, 1971.

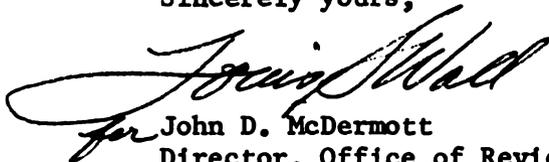
The Council is an independent unit of the Executive Branch of the Federal Government charged by the Act of October 15, 1966 to advise the President and Congress in the field of Historic Preservation.

1. In the case of land under the control or jurisdiction of the Federal Government, a statement should be made as to whether or not the proposed undertaking will result in the transfer, sale, demolition, or substantial alteration of potential National Register properties. If such is the case, the nature of the effect should be clearly indicated.
2. In the case of lands not under the control or jurisdiction of the Federal Government, a statement should be made as to whether or not the proposed undertaking will contribute to the preservation and enhancement of non-federally owned districts, sites, buildings, structures, and objects of historical, archeological, architectural, or cultural significance.

3

Should you have any questions or require any additional assistance, please contact Stephen Cochran of the Advisory Council staff.

Sincerely yours,



John D. McDermott
Director, Office of Review and
Compliance

Letter dated October 29, 1974, from the Advisory Council on Historic Preservation.

1. We agree that the requested information will be needed during the route selection process. The recommended National North Country Trail Council would be composed of appropriate Federal and State agencies. Information which the Advisory Council needs would be provided by the Federal and State agencies to the National Council during the route selection process.

2. We have consulted the National Register of Historical Places (Federal Register, February 4, 1975, V. 40, #24). We have located 36 listed sites near the possible trail route described in Section II and 42 additional sites within five miles of the possible route. Nine of the sites have been designated National Historic Landmarks; six of these are along or near the possible trail route. This list has been included as Appendix C (see also response to the National Park Service, page 156).

With the exception of the Adirondack Forest Preserve (Essex, Hamilton, and Herkimer Counties, New York) the trail can be located to avoid sites listed in the Historic Register. A corridor route through the Adirondack Forest Preserve was planned with the assistance of the Adirondack Park Agency and the New York Department of Environmental Conservation. Comment No. 3, page 181, from the Adirondack Park Agency indicates that a route through the southern Adirondacks could have a beneficial impact on the park since it would help to alleviate overuse in the High Peaks area.

3. It is not expected that the proposal would result in the transfer, sale, demolition, or substantial alteration of existing or potential National Register properties under the control or jurisdiction of the Federal Government.



DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D. C. 20250

November 29 1974

Honorable Rogers C. B. Morton
Secretary of the Interior
Washington, D. C. 20240

Re: D3819-North Country Trail

Dear Mr. Secretary:

The study report on the North Country Trail and the draft environmental statement have been reviewed as per your request.

Comments on the study report are as follows, while the comments on the environmental statement are included as an enclosure to this letter.

Comments concerning the study report

1. Page 2, first paragraph, of the study report discusses the idea of designating some segments of the trail as a National Scenic Trail, while other segments are to be designated as National Recreation Trails. We do not concur with this recommendation. We recommend that the whole trail be designated as a National Scenic Trail in accordance with the National Trails System Act and that motorized vehicle use be prohibited. The National Trails System Act authorizes the Secretary of Agriculture to establish National Recreation Trails on lands which are administered by him. We do not anticipate designating any portion of the North Country Trail route as a National Recreation Trail where it crosses National Forest lands.

2. Page 4, first paragraph, discusses right-of-way needs to protect the trail environment. It does not mention additional protection such as scenic easements which may be necessary for protection in addition to the 200 feet adjacent to the trail. The intent of the "25 acres" per mile has been confusing in the administration of the Appalachian and Pacific Crest National Scenic Trails. When it has been determined that widths greater than 200 feet are needed to protect a segment of the trail, it becomes necessary to acquire something less than 200 feet along other segments in order to stay within the 25-acre per mile limitation. We support such a limitation in order to prevent the establishing of National Scenic Trails from becoming land acquisition programs. It may be appropriate to establish a fixed acreage limit along each mile of the trail which would include scenic easements as well as acreage needed which is immediately adjacent to the trail.

3. Page 109 discusses trail costs. The figures on page 91 concerning capacity of the trail (400 people per day per mile) and the objectives for development (page 102) are not adequately reflected in the trail cost. While there is little mention made of the problems of structures, water supply, and sanitation, there are inferences that these items can be handled in primitive fashion.

We question that it is practical or possible to maintain a safe and sanitary environment within economical limits without benefit of vehicular access and electrical power at predetermined intervals when considering such numbers of users. We do not believe that development and maintenance costs reflect this need.

Thank you for the opportunity to review and comment on the study report and the draft environmental statement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert W. Long', written over a horizontal line.

Robert W. Long
Assistant Secretary for Conservation,
Research and Education
Enclosures

Comments Concerning Draft Environmental Statement
on the North Country Trail

General - We do not concur with the concept of part "scenic" and part "recreation;" therefore, no comments will be made concerning the "recreation trail" aspects of the report.

Page 6, second paragraph - The Forest Service has been reluctant to enter into agreements with landowners unless, perhaps, they are quasi-public (universities, towns, villages, etc.). It is difficult to hold a private estate to the terms of the agreement. | 1

Fourth paragraph - These figures should be checked--Minnesota, Pennsylvania, and Wisconsin also may have some non-Federal inholdings. Would suggest modifying the last sentence that says "...no other direct Federal acquisition specifically for the trail should be needed under the recommended project plan . . .", to provide for some flexibility in acquiring fee rather than right-of-way. There may be some instances where a fee purchase of the trail would be recommended by landowners and would benefit the project. | 2

Page 7, sub-section D, second paragraph - There should be some mention here of the role the National North Country Trail Council (see bottom of page 10) will have in coordinating various agency efforts to achieve the best possible uniformity throughout the system. | 3

Approximately 5,000 acres of non-Federal lands would be owned by individuals under easements or agreements (Table II). Since 61 percent of the trail is forested (Table V), roughly 3,000 acres of forest land would be under restrictions. It may be too early to plan for the kinds of restrictions needed, but it would seem wise to be thinking now about the role of the Service Forester in maintaining the kind of woodland environment, under easement or agreement, desired by trail users. | 3

It might be good business to have the landowner agree that the Service Forester could carry out whatever management work he deemed necessary for the safety and enjoyment of the public. Such work might include sanitation cuts, removal of dead or dying trees, possibly planting, opening up of scenic vistas, etc. | 4

Page 8, first paragraph - We question whether 200' is sufficient width to protect views from the trail. The tone of the report talks in both average width and specific width of 200'. There is certainly an upper limit, but there also must be flexibility in width to allow protection of the varied landscapes the trail will be traversing. | 4

Page 9 - We recommend a suggested standard or criteria be developed for locating the trail within the 10-mile corridor. As an example, what should trail locators look for; what should they avoid in the centerline location? This is most important as it sets the tone of the trail and avoids trouble spots in the future. | 5

Page 13 - The allowance of only 5 percent for administrative costs if not sufficient. | 6

Page 14 - The suggested timeframe of 5 years is not realistic. The rights-of-way must be acquired before construction can begin. It is being found that this takes several years. Then the formal construction will take several more years.

Page 14, K. - Connecting and Side Trails. This section does not indicate the Long Trail crossing in Vermont.

Page 16, under Wisconsin - Please reword to state: "...from the former Delta Lookout . . ." The lookout has been removed.

Also, please update the map on page 46 by removing the Delta Lookout symbol and name.

Page 47, third paragraph - The second sentence should read: "...Then, a short distance ... cross the eastern boundary . . ."

Page 72, A. - Impact on Vegetation. We recommend that Section 7(a) of the National Trail System Act be followed. This section in part states that "Development and maintenance of each segment of the National Trail System shall be designed to harmonize with and complement any established multiple-use plans for that specific area . . ."

The proposal, however, "protects" vegetation within the average 200' wide buffer area (first sentence). If by "protection" it is meant that no management or cutting will ever take place, then the effects of this must be shown. As an example, 43,500 acres is taken out of forest production. The removal of this acreage from manipulation or commercial use has an impact on aesthetics, wildlife, timber production, and the economy.

We recommend that the study be rewritten to allow for vegetation manipulation up to the trail side. We feel that these adjacent areas can be managed for positive trail benefit. As proposed, the plan does not take in account the variety of species or timber types along the trail. Without being allowed management within the 200' strip, we are prevented from opening potential scenic vistas, converting to a more desirable species, retaining a certain species, creating small openings, or otherwise creating visual interest. The Forest Service will permit regeneration cuts across the trail if Forest planning efforts result in such decision. This is provided for in the Act.

The footnote to the first sentence of the second paragraph refers to a 50' by 50' shelter area. This section presumes the need for shelters on the trail. Based on our experience with the Appalachian-Long Trail system, we question this need on the whole system. Primitive tent camping areas off the trail itself should be considered in order to better disperse hikers and reduce vegetative impacts. Also, we believe the 50' by 50' shelter area size is too small to handle the estimated use, and the area will gradually enlarge by impact, which may cause problems especially on private lands.

Page 72, C. - Impact on Air and Water Quality. This section fails to recognize the impacts of human and solid wastes, although it is briefly mentioned on page 78, L. Impact Related to Visitor-Use.

The intrusion of man into formerly inaccessible scenic areas will have negative effect if not controlled to meet certain experience levels.

Page 76 - If this proposal generates the development of recreational real estate, etc., the impacts of this development must be assessed as required by NEPA. This has not been done.

13

Page 78, K.- The use and location of the trail would have a significant effect on the approval of location and management of future rights-of-way for any purpose.

14

Page 78, L. - There may be disturbance to other users or residents in the area, and this should be analyzed.

15

Nothing is said of law enforcement needs brought about by trail users.

Letter dated November 29, 1974, from the Office of the Secretary of the Department of Agriculture

(Comments on the draft report have been appended to the Secretary's report)

1. The figures (page 6) for acquisition, easement, and agreement represent an average for the entire trail. It is not meant to imply that the Forest Service will enter into agreements with landowners.

2. These figures were compiled from Forest Service Class A maps of the involved national forests. Given the scale and degree of generalization, we believe that these figures are reasonable estimates of the miles of inholdings along the possible route of the North Country Trail described in Section II. At the route selection stage, these--and other--figures are subject to change.

The last sentence contains no limitations; right-of-way may be acquired in fee, easement, or agreement. The Forest Service may follow its own policy regarding acquisition of inholdings.

3. Reference to the national North Country Trail Council has been added.

Details on easements or agreements would be a part of the master plan process.

4. Flexibility regarding right-of-way and easement is discussed on page 6, paragraph 3 of the draft environmental impact statement. The State of Wisconsin has advised us that its criteria of a 12-foot width for snowmobile trails is adequate. We have revised the standards on page 7 accordingly.

5. Criteria would be developed by the national North Country Trail Council as part of the route selection process. All comments on the report and the impact statement become a part of the public record and will be made available for the council's consideration.

6. The figure 5 percent was in error. The correct figure is 20 percent as shown in Table III, page 15.

7. Five years is the time frame for appropriation of Federal funds. A total of 10 years is the goal for completion of the trail on Federal lands.

8. Most of the trails listed in Section K are planned trails, not existing ones. In addition, because of the amount of use on Long Trail, it is not felt that additional use should be encouraged by listing this trail as a side or connecting trail.

9. Corrections made. See response No. 2 to the U. S. Forest Service.

10. A discussion of forest manipulation has been added to Section III, H, Impact on Land Use. We have made provisions for forest management practices such as removal of diseased trees and selective cutting for aesthetic purposes.

11. Shelters versus tent camping would be determined by the administering agency. The use of the 50 x 50-foot area was used only to provide a generalized estimate of soil and vegetative impact.
12. We have recognized the problem that intensive use can lead to organic waste. Additional discussion related to stream crossings and sanitary facilities has been incorporated into the final environmental impact statement (see page 92).
13. While the draft environmental impact statement recognized that development could degrade the trail user's experience, we concur that more discussion is needed. The final environmental impact statement, Section H, Impact on Land Use (page 95), discusses the impacts of trail related development.
14. This section refers to "highways, utility lines, and other developments." We have added a specific reference to pipelines. We understand that the Forest Service is concerned about Forest Service roads which might be required for logging operations or maintenance. Given Section 7(a) of the National Trails System Act, we believe that there is no prohibition on necessary Forest Service roads. If the impact on the trail is judged to be severe, the trail can be rerouted.
15. Annoyance to people who live near the trail was acknowledged in Section V, Adverse Impacts. Specific problems will be addressed during route selection and master planning.

A specific reference to law enforcement has been added to the final environmental impact statement (see page 99).



UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Washington, D.C. 20250



8420

OCT 25 1974

Mr. John D. Cherry
Regional Director, Lake Central Region
Bureau of Outdoor Recreation, USDI
3853 Research Park Drive
Ann Arbor, Michigan 48104

L

Dear Mr. Cherry:

We have reviewed the study report and Draft Environmental Statement for the Proposed North Country Trail and have the following recommendations:

1. We recommend that the whole trail be classified as scenic in accordance with the National Trail System Act and ORV use not be allowed. We favor Alternative 5 on page 84, and feel that the alternative and its effects should be explored to a greater depth. In any case, the trail should be classified as scenic when it crosses National Forest land and is managed for non-motorized travel.

2. We recommend that Section 7(a) of the National Trail System Act be followed. This section in part states that "Development and maintenance of each segment of the National Trail System shall be designed to harmonize with and complement any established multiple-use plans for that specific area. . . ."

The proposal, however, "protects" vegetation within the average 200' wide buffer area (page 72, paragraph 2). If by "protection" it is meant that no management or cutting will ever take place, then the effects of this must be shown. As an example, 43,500 acres is taken out of forest production. The removal of this acreage from manipulation or commercial use has an impact on aesthetics, wildlife, timber production, and the economy.

We recommend that the study be rewritten to allow for vegetation manipulation up to the trail side. We feel that these adjacent areas can be managed for positive trail benefit. As proposed, the plan does not take into account the variety of species or timber types along the trail. Without being allowed management within the 200' strip, we are prevented from opening potential scenic vistas, converting to a more desirable species, retaining a certain species, creating small openings, or otherwise creating visual interest. It should be made clear that the Forest Service will permit regeneration cuts across the trail if Forest planning efforts result in such decision. This is provided for in the Act.

3. Page 18, paragraph 3 - We feel that the proposed trail should not traverse areas of Eastern Wilderness as proposed in that section. The objectives and management for these areas may be different than the objectives of management for the scenic trail.

3

4. We participated in the meetings and reviews for proposed locations. The proposed eastern terminus, located on the Appalachian Trail close to the Vermont-New Hampshire border, was only presented and discussed in the last few minutes of the last meeting.

We do not agree with this proposal as it does not seem realistic to construct when there is no indication on the part of State officials and local clubs to endorse it. The Green Mountain Club has already gone on record as opposing this proposal, and we understand the State will follow suit.

4

We believe the most feasible route is that initially considered, the Woodford terminus, which would accomplish the same purpose and still provide a logical connecting route through New York State. It should also be determined if the proposed trail through the Adirondack Forest Preserve conflicts with the constitution of New York State, which prohibits any development within the so-called "blue line" delineating the boundaries of its Preserves.

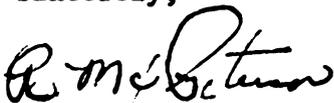
5. The trail follows scenic rivers in many areas, and the question must be answered as to whether the objectives for scenic rivers are the same as those of a scenic or recreational trail. It should be recognized that conflicts may result in combining the two.

5

We are including comments dealing with specific pages of the environmental statement as an enclosure to this letter. These comments are rather lengthy, but we feel they are all important to properly present this proposal.

Thank you for the opportunity to review and comment on this environmental statement.

Sincerely,



R. MAX PETERSON
Deputy Chief

Enclosure

Letter dated October 25, 1974, from U.S.D.A. Forest Service

1. The preference for Alternate 5, a North Country National Scenic Trail, is noted.
2. We agree that Section 7(a) of the National Trails System Act should be followed as stated on page 75 of the draft environmental impact statement. The subject of forestry management has been discussed in greater detail in the final environmental impact statement in Section H, Impact on Land Use. In some areas it is likely that no cutting would occur. In others, some removal, such as of diseased trees or trees which pose a hazard, would be permitted. Some cutting for aesthetic purposes--to open up a scenic view--would be logical. As for commercial forestry, selective cutting may or may not occur; clear cutting does not seem to be conducive to a natural trail environment. Where Federal land is concerned, Section 7(i) of the Act provides for the relocation of trail right-of-way. It is possible that, if intensive logging were necessary, a portion of the trail could be relocated, perhaps on a rotating basis. This provision of the Act was discussed in Section IV, Mitigating Measures, on page 81 of the draft environmental impact statement.

The comment regarding 43,500 acres taken out of forest production needs clarification. We understand that the Forest Service arrived at this figure by multiplying the 1,700 miles of new trail which would be constructed through forested land by the 25 acres/mile (see page 91 for basis of these figures). This should equal 42,500 acres, not 43,500. This "forested land" category is based on a 40-acre unit with a scattering of trees whose crowns cover at least 20 percent of the area (see Table V, page 88). Thus, the 42,500 acres of wooded land is a maximum figure which, we believe, is not realistic. In addition, this wooded land is not all harvested for timber, since it includes public lands not managed for harvest (such as wildlife refuge and parks), noncommercial private wood lots, commercially undesirable species, etc. It includes Forest Service land which may become eastern wilderness and would not be logged. It is precisely because of the different management policies that Section 7(a) was discussed in Section H, Impact on Land Use (page 75).

While a no-harvest policy with the 200-foot right-of-way is considered ideal, it may not be practical, especially where easements and agreements on private lands are utilized.

3. The location of the corridor was a consensus of the study team. Actual routing of a trail within the corridor has not occurred. During the master plan stage, management objectives will be considered as a part of route selection.
4. The eastern terminus has been revised to a nonspecific location along the Appalachian Trail. A discussion of this terminus is given in Section II, Description, Eastern Terminus (page 29).

The New York Department of Environmental Conservation and the Adirondack Park Agency participated in the selection of a corridor route through the Adirondacks. Comment No. 3 (page 181) from the Adirondack Park Agency indicates that the recommended corridor location will relieve pressure on the High Peaks area.

5. During the master plan stage management objectives will be considered.

(The Forest Service submitted specific comments which are identical to those of the U. S. Department of Agriculture, Office of the Secretary.)

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

1 Burlington Sq., Suite 205, Burlington, Vermont 05401

September 30, 1974

Mr. John D. Cherry
Regional Director
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Re: Review of Draft Environmental Statement for the Proposed
North Country Trail

Dear Mr. Cherry:

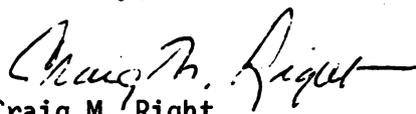
The very general nature of the trail location in Vermont as presented in this draft environmental statement makes it difficult to make any valid comment. Many of the assumptions in the acquisition, construction, and maintenance of the trail would have to be realities of a more positive nature to provide a more effective parameter of the impact of the trail through Vermont.

The western trail ends in Vermont at the D.A.R. State Park on the shores of Lake Champlain. Would boats be provided to cross the lake or would the nearby toll bridge at Chimney Point be utilized to cross the lake? 1

Another real consideration has to be the impact related to visitor use. Intensive use of sections of the trail as witnessed on Vermont's Long Trail can result in the deterioration of the trail concept ideals. Then it becomes a costly maintenance problem on publicly owned lands and one of resultant friction with the private landowner over whose land the trail traverses.

This problem can be resolved to a degree with mountain or hiking clubs that maintain many trails such as the Long Trail. These are groups that should and need to have an input into the planning process for this proposed trail. 2

Sincerely,


Craig M. Right
State Conservationist

cc: Council on Environmental Quality, Washington, D.C.
K. E. Grant, Administrator, Soil Conservation Service, Washington, D.C.
Coordinator of Environmental Quality Activities, Washington, D.C.

CMR:TWP:mrB

Letter dated September 30, 1974, from U. S. Department of Agriculture,
Soil Conservation Service

1. If the trail were located in Vermont, a logical route would be to the D.A.R. State Park. The actual location of the trail has not been determined, nor has the method of crossing Lake Champlain been determined. The nearby bridge would seem to be a logical place to cross the lake if the trail is located here. Since Vermont is not in favor of locating the North Country Trail in the State, the eastern terminus could be located elsewhere.

2. We agree that hiking clubs should have an input into the planning process. The State trail councils provide for that input.



DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF OF ENGINEERS
WASHINGTON, D.C. 20314

IN REPLY REFER TO
DAEN-CWP-V

25 October 1974

Honorable Rogers C. B. Morton
Secretary of the Interior
Washington, D. C. 20240

Dear Mr. Secretary:

This letter presents our comments on the North Country Trail Study Report and the draft environmental statement as requested by your reference of 17 September 1974, D3819-North Country Trail.

Your study appears to us quite factual and orderly in presentation and we agree with its findings that designation of the North Country Trail is both feasible and desirable. Further, we have reviewed the study report and draft environmental statement from our areas of interest and find that there are no existing or proposed Corps of Engineers reservoir projects with which the proposed North Country Trail would conflict.

The following specific comments are offered for your consideration:

a. North Country Trail Study Report

- (1) The proposed trail is compatible with the planned Kindred Dam on the Sheyenne River.
- (2) It is believed that the study would benefit from a general discussion of what measures are proposed for crossing of navigable and other waterways where existing crossings may not be found within reasonable detour from the main trail.
- (3) Although it is recognized that the trail alignment discussed is in the form of a conceptual 10 mile wide corridor, it was noted that discussion of the relationship of the proposed action to land use plans, policies and controls for the affected area is lacking.

b. North Country Trail Draft Environmental Statement

25 October 1974

(1) Although many existing, under construction and authorized Corps of Engineers projects are within or near the proposed 10 mile wide corridor only the Kindred Dam is discussed in the EIS. Since many opportunities exist for compatible uses of project lands and facilities in connection with construction and management of the proposed trail, it is suggested that the Final EIS discuss the nearby Corps of Engineers projects. | 1

(2) Page IV, para 3, 2nd sentence - Another adverse effect of the proposed trail would be disturbance to wildlife. | 2

(3) Page 1, section 1A, para 1 - Give the number of the Congress and the number of the Act which authorized the proposed action. | 3

(4) Page 16 - The last statement under Pennsylvania, "The Appalachian Trail in Massachusetts via the Proposed Highland Path" should be clarified. | 4

(5) Page 63, para 4 - Lake Audubon is not synonymous with Lake Sakakawea. Lake Audubon is a lake east of Lake Sakakawea (separated by an earth filled embankment) that is dependent on the latter lake for water. In essence, the lakes are two different lakes located close together. | 5

(6) Page 65, para 2 - At this time it appears that the authorized Charging Eagle Bay Bridge may not be constructed. | 6

(7) It is suggested that accommodations and regulations for health and safety be considered and discussed in the EIS. | 7

Sincerely,



MARVIN W. REES
Colonel, Corps of Engineers
Executive Director of Civil Works

Letter dated October 25, 1974, from the Office of the Chief of Engineers,
Department of the Army

(Response to comments on the report are reflected in the EIS in Section I, M., Interrelationship With Other Plans and Developments.)

1. Authorized Corps of Engineers (COE) projects which are existing or under construction were considered in the location of the corridor and the possible trail route discussed in Section II. Generally the corridor routing by-passes COE projects in order to avoid conflicts. The only known authorized COE project which was unavoidable is Kindred Dam. Corps of Engineers projects within the 10-mile wide corridor could be considered for the trail location at the route selection stage. Three projects, all in Ohio, appear to be possibilities for consideration: Salt Fork Reservoir, an authorized project southeast of Chillicothe; East Fork Reservoir, under construction on the East Fork of the Little Miami River; and Caesar Creek Reservoir, under construction on a tributary to the Little Miami River.
2. Disturbance to wildlife has been added to the summary (see also page 92).
3. Section I., A. has been revised.
4. The proposed Highland Path would cross Pennsylvania, continue into New York, traverse the Catskill Mountains, and join the Appalachian Trail in Massachusetts.
5. Correction noted.
6. Information added.
7. We have mentioned some potential problems such as the need for sanitary facilities (page 92), hunter-hiker conflict (page 94), and hazards of crossing highways to both trail user and motorist (page 97). These items will be dealt with by the administering agencies.



United States Department of the Interior

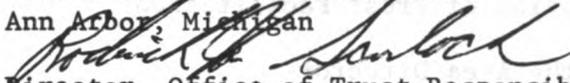
BUREAU OF INDIAN AFFAIRS
WASHINGTON, D. C. 20245

**IN REPLY REFER TO
Trust Facilitation
EQ (DES 74/84)**

OCT 25 1974

Memorandum

To: Regional Director, Lake Central Region
Bureau of Outdoor Recreation
Ann Arbor, Michigan

From: 
Director, Office of Trust Responsibilities

Subject: Review of Draft Environmental Impact Statement for Proposed
North Country Trail (DES 74/84)

Enclosed is a copy of comments from the Minneapolis Area Office of the Bureau of Indian Affairs.

The Aberdeen Area Office has indicated that it sees no adverse environmental impacts but has not yet received comments from the tribal governments concerned.

Enclosure





United States Department of the Interior

OCT 15 1974

BUREAU OF INDIAN AFFAIRS

MINNEAPOLIS AREA OFFICE
831 SECOND AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55402

IN REPLY REFER TO:

Land Operations
(DES 74/84)

OCT 3 1974

Memorandum

To: Chief, Division of Trust Facilitation

From: Office of the Area Director

Subject: Review of Draft Environmental Impact Statement for
Proposed North Country Trail (DES 74/84)

We have reviewed the subject draft environmental statement and find that it is inadequate in terms of assessing the trail's impact on Indian trust lands.

The proposed route corridor passes through the original exterior boundaries of two Indian reservations in Minnesota (White Earth and Leech Lake) and near the St. Croix Reservation in Wisconsin. Land within the original boundaries of these reservations is owned by Indians and non-Indians.

As described in the draft environmental statement, the conceptual corridor is ten miles wide with the 200 ft. right-of-way trail to be situated somewhere therein. Inasmuch as the exact proposed siting of the trail is not definitely established, it is impossible to determine the exact parcels of land to be affected; therefore, it is impossible to make a proper environmental assessment at this time.

Reviews are being solicited from the tribal governments concerned. No replies have been received as of this date. Any tribal input information received will be forwarded to your office promptly.

Robert Nordwall
Acting Area Director

Memorandum dated October 25, 1974, from the Bureau of Indian Affairs

1. The corridor concept would allow for a route selection which, while crossing within the original boundaries of the Leech Lake and White Earth Indian reservations, could avoid acquisition of lands owned by the reservations. This is why the figures for miles of trail on Indian land (table IV, page 86) do not include mileage for Minnesota. The possible impact on Indian lands has been a consideration throughout the study. The Indian interest will continue to be considered during the route selection and master plan stage.



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
WASHINGTON, D. C. 20245

IN REPLY REFER TO:
Trust Facilitation
EQ (DES 74/84)

NOV 14 1974

Memorandum

To: Regional Director, Lake Central Region
Bureau of Outdoor Recreation
Ann Arbor, Michigan

From: *Robert H. ...*
Regional Director, Office of Trust Responsibilities

Subject: Review of Draft Environmental Impact Statement for Proposed
North Country Trail (DES 74/84)

In reference to our memorandum of October 29, 1974, transmitting the
comments of the Minneapolis Area Office, enclosed is a copy of
comments from the Aberdeen Area Office on the subject draft environ-
mental statement.

Enclosure





United States Department of the Interior
 BUREAU OF INDIAN AFFAIRS
 ABERDEEN AREA OFFICE
 115 FOURTH AVENUE S.E.
 ABERDEEN, SOUTH DAKOTA 57401



IN REPLY REFER TO:
 Trust & Nat. Res.
 EQ (DES 74/84)

Memorandum

OCT 29 1974

Rec'd - EQ
 NOV 5 1974

To: Commissioner of Indian Affairs
 Attention: Chief, Division of Trust Facilitation (210)

From: Office of the Area Director

Subject: Review of Draft Environmental Impact Statement for a
 Proposed North Country Trail (DES 74/84)

We have reviewed the subject draft impact statement and have the following comments to offer on that portion of the trail as it crosses the Indian Reservations of Fort Totten and Fort Berthold. It has been noted that 20% of the trail will traverse Indian lands in North Dakota.

We realize the difficulty of writing a detailed statement at this time and can only offer general comments on this draft statement. As this trail crosses the two reservations it can be said generally, that the tribes will not allow motorized vehicles to use that portion of the trail on the reservation. The trail would have to be classified as a primitive horseback and hiking trail. The impacts to the land and socio-economic impacts from this type of recreational use would be short range and easily reclaimed should the project be discontinued. The amount of use expected over the reservation portion of the trail by horseback would not be so voluminous as to cause any problem with organic waste, animal and human waste would not accumulate to any significant degree in any specific area as to cause stream or aquifer infiltration or degradation.

Section III D page 73, Impact on Fish and Wildlife, we believe if this trail were to cross and recross the Sheyenne River, the resulting turbidity by horses would effect the aquatic organism as well as cause water quality degradation. Maintaining the trail as a foot path and horseback riding would cause the least effect to land use and vegetation. We are wondering if any shelters would be provided on the open prairie, and primarily of what size and type of structures, so impacts may be better determined and assessed.



Concerning the final location of the Trail across the Fort Berthold Reservation, the governing body of the Three Affiliated Tribes has gone on record disapproving the construction of the Charging Eagle Bay Bridge, this request has been honored by the Corp of Engineers by discontinuing further plans and funding in the local area.

2

We also note that the exterior boundaries of the Fort Berthold Reservation are erroneously indicated on the map which starts the section on North Dakota. The boundary should reflect the original treaty boundary.

3

The tribal councils of Fort Totten and Fort Berthold reserve the right to make final selection and approval of the location of the North Country Trail as it traverses their reservations.

We appreciate the opportunity to offer our comments on this draft environmental statement.



ACTING Area Director

Memorandum dated November 14, 1974, from Bureau of Indian Affairs

1. Questions on Section III, D. concerning shelters on the prairie cannot be answered at the corridor stage. It is recommended that river crossings be on bridges, not through the water and planned for the least possible adverse impact.
2. The probability of the charging Eagle Bay Bridge not being constructed has been added to the final environmental impact statement.
3. The map of North Dakota has been revised to show the original treaty boundaries of Fort Berthold Indian Reservation.



United States Department of the Interior

1792 (930)

BUREAU OF LAND MANAGEMENT

EASTERN STATES OFFICE
7981 Eastern Avenue
Silver Spring, Maryland 20910

DES-74/84

Memorandum

OCT 24 1974

To: Regional Director, Lake Central Region
Bureau of Outdoor Recreation

From: Director, Eastern States Office

Subject: Review and comment on draft environmental impact
statement for proposed North Country Trail

We have reviewed the subject draft statement and offer the following comments for your consideration.

II. Description of the Environment North Dakota

E. Land Use

McClain, Mercer and Dunn Counties have large deposits of strippable Lignite coal reserves. These reserves have not yet been clearly defined. Subsequent mining and other associated activities in these Lignite deposits could have a significant impact on the proposed trail location.

III. The Environmental Impact of the Proposed Action

H. Impact on Land Use

Curtailling or prohibiting mineral extraction and/or logging within view of the trail will have a significant impact on land use and may require an alteration of the multiple use plans for Federal lands. This potential impact should be identified in the draft statement.



Save Energy and You Serve America!

VIII. Alternatives

A. Alternatives: Projects

Alternatives 3 (A shorter Trail) and 4 (A Segmented Trail) could be expanded to more fully consider the possible beneficial and adverse effects that either of these two alternatives might have on the environment. Further, both alternatives would appear viable as they may meet the needs of more than 90% of the population with less environmental cost.

3

A handwritten signature in cursive script, reading "Farrell J. Uby". The signature is written in black ink and is positioned in the lower right quadrant of the page.

Memorandum dated October 24, 1974, from the Bureau of Land Management

1. It is recommended (on page 11) that appropriate Federal agencies should be represented on the national North Country Trail Council. At the time the Secretary of the Interior, with advice of that council, selects the route, input concerning mineral resources would be expected.
2. See response No. 2 to the Forest Service concerning multiple use plans and logging operations. Additional discussion of this subject has been incorporated into the final environmental impact statement. The provision for relocating trail sections on Federal lands would also apply to mineral extraction. The removal of minerals in the trail right-of-way or within sight or sound of the trail is undesirable; however, if it became necessary to do so on Federal lands, the trail could be relocated.
3. Additional discussion of these alternatives has been incorporated into the Alternatives Section. The impacts of these alternatives will depend on the length of the trail and the length and location of segments. We doubt that for either alternative the trail location could be so designed to meet the needs of 90 percent of the population.



United States Department of the Interior

BUREAU OF RECLAMATION
WASHINGTON, D.C. 20240

IN REPLY
REFER TO: 430/420
121.

OCT 18 1974

Memorandum

To: Director, Bureau of Outdoor Recreation
From: Acting Assistant
Commissioner of Reclamation
Subject: Review of Draft Environmental Impact Statement for
Proposed North Country Trail (INT DES 74/84)

As requested in the September 3, 1974, memorandum from the Acting Regional Director, Lake Central Region, Bureau of Outdoor Recreation, we have reviewed the above-mentioned environmental impact statement.

The proposed action is the authorization, by the Congress, of the establishment of the North Country Trail as a component of the National Trails System. The trail would be located within a conceptual 10-mile-wide corridor and would extend 3,246 miles from Vermont through several States and terminate in North Dakota. Right-of-way for the trail would average 200 feet in width. The specific location of the trail route within the 10-mile-wide corridor has not been determined, but the draft environmental statement indicates that detailed environmental statements will be prepared by the Federal land managing agency, if that agency determines such statements are necessary.

Our review has been from the standpoint of the effect the proposed trail may have on Bureau of Reclamation projects. We offer the following comments for your consideration:

1. The specific location of the 10-mile-wide corridor is indefinite. The general location is designated by colored lines on small-scale maps in the environmental statement. There is insufficient detail on the maps to establish the specific location of the corridor in relation to features of the Garrison Diversion Unit, North Dakota, and other existing or proposed Reclamation projects.



2. From the general location of the corridor, it appears that the trail would cross planned irrigation service areas in the Lincoln Valley and Warwick-McVile areas of the Garrison Diversion Unit. The potential impacts associated with that route are not addressed in the environmental statement. It appears that the conflict of uses between the trail and irrigation as well as dryland farming could cause significant management problems. We recommend that the trail be routed to avoid areas where irrigation service is planned where possible. Our Regional Director at Billings, Montana, can provide you with detailed information concerning the locations of existing and planned Reclamation project facilities and irrigation service areas in the vicinity of the corridor.

3. On page 17 of the environmental statement, it is stated that "Bureau of Reclamation property around existing and planned features of the Garrison Diversion Unit has been utilized as the probable location of the North Country Trail." A trail linking the recreation facilities planned in conjunction with the Garrison Diversion Unit seems desirable to us. However, very close coordination between the agency responsible for planning and administering the trail and the Bureau of Reclamation will be required. If the trail is located on project rights-of-way, such as along canals and drainage channels, it will be necessary to provide for the safety of people using it and to prevent interference with operation and maintenance of project facilities. Rights-of-way along water conveyance facilities are often occupied by construction and maintenance equipment. Potential use conflicts and hazards to the safety of trail users, associated with operating equipment and water conveyance facilities, are of serious concern to us.

4. On page 63, second paragraph, "Garrison Dam Diversion Unit" should be changed to "Garrison Diversion Unit."

In summary, the draft environmental statement on the proposed trail system is too general to enable us to evaluate some specific impacts it may have. It appears that detailed environmental assessments should be made for specific sections of the trail as its location is more accurately determined.

When a specific trail route in the vicinity of the Garrison Diversion Unit has been selected, our agency should review and approve the location and development plans to prevent conflict between the proposed action and project operations. In addition, future planning

or actions concerning the trail in that vicinity should be closely coordinated with appropriate State agencies and the Garrison Diversion Conservancy District.

We have no objections to the proposed trail system, provided that the final location and operation are planned so that conflicts with other land uses and project operations are minimized.

Cliff J. Barrett

Memorandum dated October 18, 1974, from the Bureau of Reclamation

1 & 2. Recommendations regarding route location will be utilized at the route selection stage. We expect that the Bureau of Reclamation would be a member of the national North Country Trail Council which would include appropriate Federal and State agencies. Possible trail treads, safety measures, etc., will be considered during route selection and master planning.

3. Corrections noted.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Federal Building, Fort Snelling
Twin Cities, Minnesota 55111

IN REPLY REFER TO:

ES-EIR

October 25, 1974

DES 74-84

MEMORANDUM

TO: Regional Director, Bureau of Outdoor Recreation,
Ann Arbor, Michigan

FROM: Regional Director, U. S. Fish and Wildlife Service,
Twin Cities, Minnesota

SUBJECT: Review of draft environmental impact statement for
Proposed North Country Trail

This responds to your September 3 request for our review of the subject draft environmental impact statement (EIS).

We have reviewed the EIS and find it to be adequate.

When a corridor is selected and actual locations of the tract and facilities are pinned down more closely, will another EIS be prepared to discuss the impacts of each trail segment and facility?

| 1

cc: Washington OEC



Memorandum dated October 25, 1974, from the Fish and Wildlife Service

1. The selected right-of-way must be published in the Federal Register. At that time the selected route can be reviewed and commented upon. See Section I.A.3. of the final environmental impact statement for a discussion of the possible preparation of environmental impact statements at this route selection stage.



United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:
L7619-MQ

NOV 13 1974

Memorandum

To: Director, Bureau of Outdoor Recreation

Through: Assistant Secretary for Fish and Wildlife and Parks

From: Associate Director, Park System Management

Subject: Review of report and draft environmental statement for North Country Trail (DES 74-84)

Handwritten: noted for 7/22
RR 11-13

As requested, we have reviewed the subject report and environmental statement and offer the following comments.

COMMENTS ON THE STUDY REPORT:

Following is a supplementary list of registered Natural Landmarks and study sites along the trail route:

Registered National Natural Landmarks

<u>State</u>	<u>Trail Segment</u>	<u>Location and Name of Site</u>
Ohio	H-I	Yellow Springs Vicinity Glen Helen Nature Preserve Clifton Gorge
Michigan	L-M	Seney National Wildlife Refuge Northern Hardwood Natural Area
Minnesota	O-P	Itasca State Park Itasca Natural Area

Natural Landmark Study Areas

Ohio	H-I	Fort Ancient State Memorial Mixed Woods
	H-I	Yellow Springs Vicinity Wilberforce Beech Woods Jacoby Creek Valley John Byron State Park
	I-J	Lake Superior State Forest Betsy Lake Natural Area



<u>State</u>	<u>Trail Segment</u>	<u>Location and Name of Site</u>
		Betsy River Virgin Forest
		Fisher Bridge Red Pine
		Grand Marias Jack Pine
	L-M	Pictured Rocks National Lakeshore
		Grand Sable Dunes
		School Forest Red Pine
		Cusino Northern Hardwoods
		Beaver Basin
		Little Beaver Lake Northern
		Hardwoods and Swamp
		Pictured Rocks
		Twelve Mile Beach
		Rock River Canyon Northern
		Hardwood Forest
		Yellow Dog River-Marquette Co.
		Yellow Dog Research Natural Area
		Porcupine Mountain State Park
		North Mirror Lake Trail
		Pinkerton Creek Trail
Minnesota	O-P	Itasca State Park
		Itasca Virgin Pines
		Itasca Wilderness Area
		St. Croix State Park
		Jay Cooke State Park
		Virgin Stand
		Duluth
		Magney Park Old Growth Stand
		Twin Lake Bogs
North Dakota	T-U	Manfred SW 7½ minute Quadrangle, comprising a 51 square mile area with the southwest corner at 100 degrees west longitude, 47 degrees 30 min- utes north latitude in Wells County -- including parts of T.197 and 148 N., R. 72, 73 W.
Vermont		Cornwall Swamp, Addison County
		Queechee Gorge, Windsor County
		Cranberry Swamp, Addison County
		Noonan Oak-Hickory Woodlot, Addison County
		Dead Creek Oak-Hickory Woods, Addison County

<u>State</u>	<u>Trail Segment</u>	<u>Location and Name of Site</u>
New York		McLean Bogs, Tompkins County Round Lake, Onondago County Cayutaville White Pine Forest, Tompkins and Schylur Counties Deep Woods Glen, Cortland and Onondago Counties Etna Pine Woods, Tompkins County Labrador Pond, Cortland and Onondago Counties Mt. Dix, Esses County Rieman Woods, Tompkins County

Page 79 incorrectly cites the date for the construction of Fort Abercrombie as 1958. Obviously the date 1858, which conforms to the date cited in the draft environmental statement, was intended.

Comments on the Environmental Statement:

The environmental statement fails to assess the impacts of the proposed trail on cultural resources. This deficiency results from the study report recommending a "conceptual 10-mile wide corridor" in which a 200 foot-wide trail route would be located at some future time. The environmental statement indicates that "A survey of historical, archeological, and cultural resources would be required as part of the selection process in order to avoid adverse impacts to those resources." In other words, the effects of the trail on cultural resources are not known and surveys by qualified professionals of cultural resources along the trail route have not been undertaken or scheduled. Impacts of the proposed trail on cultural resources cannot be assessed without such surveys.

The appropriate state clearinghouses for archeological information should be contacted concerning archeological surveys. A list of contacts is enclosed. (Enclosure 1)

The final statement should confirm consultation with the National Register of Historic Places. Since all properties on the National Register are published in the Federal Register, the statement should reflect consultation with the issue of February 19, 1974, and all subsequent monthly supplements. The supplementary listings of sites added to the National Register, subsequent to publication of the previous supplement, are cited in the Federal Register appearing on the first Tuesday of each month. If the proposed project will have an effect upon a National Register listing, the statement should reflect compliance with Section 106 of the National Historic Preservation Act of 1966 (P.L. 89-665) and Executive Order 11593.

We believe the final statement should include letters of comment from the several State Historic Preservation Officers involved. This would enable them to advise whether the project would have an effect on a present or proposed National Register nomination.

Enclosure

A handwritten signature in black ink, appearing to read "J. E. Cook". The signature is written in a cursive style with a large, sweeping initial "J".

ENCLOSURE 1

Michigan

Dr. James E. Fitting
State Archaeologist
Michigan History Division
Michigan Department of State
208 North Capitol Avenue
Lansing, Michigan 58918

Minnesota

Dr. Elden Johnson
State Archaeologist
Department of Anthropology
University of Minnesota
Minneapolis, Minnesota 55455

New York

New York State Education Dept.
Anthropological Survey of the
New York State Museum and
Science Service
State Education Building
31 Washington Avenue
Albany, New York 12210

North Dakota

Mr. James E. Sperry
Superintendent
State Historical Society of North Dakota
Liberty Memorial Building
Bismarck, North Dakota 58501

Ohio

Ohio Historical Society
Division of Archaeology
Columbus, Ohio 43210

Pennsylvania

State Archaeologist
Pennsylvania Historical and
Museum Commission
Box 232
Harrisburg, Pennsylvania 17108

Vermont

University of Vermont
Department of Sociology and
Anthropology
31 South Prospect Street
Burlington, Vermont 95401

Wisconsin

Wisconsin Archeological Survey
State Historical Society of
Wisconsin
816 State Street
Madison, Wisconsin 53706

Memorandum dated November 13, 1974, from the National Park Service

1. The information which the National Park Service has requested is not available at this time. We believe that the proper time for a detailed survey is during the route selection stage. Since appropriate Federal and State agencies would comprise the national North Country Trail Council, input relative to cultural, archeological, and historic resources should be reflected when the Secretary of the Interior, with advice of the national council, selects the route. It is possible that specific environmental impact statements will be prepared on the route selection. See discussion under Section I.A.3, Compliance with NEPA, in the final environmental impact statement.

We have consulted the National Register of Historical Places (Federal Register, February 4, 1975, V. 40, #24). We have located 36 listed sites near the possible trail route described in Section II and 42 additional sites within five miles of the possible route. Nine of the sites have been designated National Historic Landmarks; six of these are along or near the possible trail route. This list has been included as Appendix C.

With the exception of the Adirondack Forest Preserve (Essex, Hamilton, and Herkimer Counties, New York) the trail can be located to avoid sites listed in the Historic Register. A corridor route through the Adirondack Forest Preserve was planned with the assistance of the Adirondack Park Agency and the New York Department of Environmental Conservation. Comment No. 3, page 181, from the Adirondack Park Agency indicates that a route through the southern Adirondacks could have a beneficial impact on the park since it would help to alleviate overuse in the High Peaks area.

During the route selection stage, it will be decided which sites, if any, to include along the trail route, which to make accessible by side trails, and which to avoid entirely. Presumably, by the time the route selection takes place, additional sites will have been added to the list and these will be considered also.

The Historic Preservation Officers have been contacted (excluding Vermont), informed of the conceptual nature of the trail proposal, and assured that they will be contacted again if the concept is authorized by Congress. Four States have responded to date: New York, Pennsylvania, Wisconsin, and Minnesota (see attached letters). Generally, these States indicate a need for surveys to be conducted as part of the route selection stage. Two States indicate a need for detailed maps and information on proposed construction along the trail; neither of which is available at the corridor concept stage. Detailed maps would be available at the route selection stage.



MINNESOTA HISTORICAL SOCIETY

Fort Snelling Branch (Building 25), Fort Snelling, St. Paul, Minnesota 55111 • 612-726-1171

10 June 1975

Mr. Richard Rieke
Assistant Regional Director
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Rieke:

RE: D3819
North Country Trail

Your letter of 21 May 1975 to Mr. Russell W. Fridley, Director of the Minnesota Historical Society, has been referred to me for comment. The Society is indeed interested in the North Country Trail proposal and in the identification and protection of historic, archaeological, cultural, and natural features along the route. A number of such features have been recorded by the Survey and Planning and Archaeology sections of the Society, although a sufficient potential exists that other, yet unrecorded, sites exist within proximity to the project corridor. Many areas through which the trail will pass have no recent survey recorded. Therefore, a survey should be considered an essential step in the formulation of actual route definition.

The updated Inventory of Minnesota Historic Sites is nearing publication. A copy will be sent to your office for use in this project.

If I may be of further assistance, please contact me.

Respectfully,

Charles W. Nelson
Supervisor - E.I.S.
Historic Sites Survey and Planning

CWN/fr



NEW YORK STATE PARKS & RECREATION Empire State Plaza, Albany, New York 12238 Phone: 518 474-0458
Orin Lehman, Commissioner

June 13, 1975

Mr. Richard D. Rieke
Assistant Regional Director
Lake Central Region
Bureau of Outdoor Recreation
U. S. Department of the Interior
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Rieke:

In reply to your letter of May 21, 1975 we are sending the attached list of historic and archeological sites on or proposed for the National Register, in the proximity of the North Country Trail corridor.

We would like to note that approximately three years ago considerable field work had been accomplished in New York State with representatives of the Department of the Interior, National Park Service and Bureau of Outdoor Recreation; Department of Agriculture; State and Federal Departments of Transportation and the New York State Department of Environmental Conservation and our agency. A 1:250,000 scale map had been prepared showing some 600 historic, recreational and cultural sites along the proposed corridors of the North Country Trail. These maps were retained by the Bureau of Outdoor Recreation, Northeast Regional Office and we assume copy was provided to the Ann Arbor, Michigan Office for further trail location and planning. The sites on or nominated for the National Register were all mapped and listed through these studies.

We do not feel that significant changes have occurred to reduce the value of this original effort at mapping historic, recreation and cultural sites. Consequently, we hope that the previously transmitted information will be consulted in further trail location work. Please let us know if we can be of any further assistance.

Sincerely,

CHARLES F. BREUEL
Deputy Commissioner

PROPOSED NORTH COUNTRY TRAIL

Properties listed on/or proposed for nomination to the National Register:

Allegany County - none

Steuben County - Hornell Public Library, Hornell
Merrill Silk Mill, Hornell (Proposed)
Village Green Historic District, Bath (Proposed)

Schuyler County - Schuyler County Courthouse District, Watkins Glen

Tompkins County - The Old Mill, Enfield (Recommended by COR)

Cortland County - McGraw Historic District, McGraw (Proposed)
Hatheway House, Solon (Recommended by COR)

Madison County - Canastota Canal Town District, Canastota (Proposed)

Onondaga County - Manlius Village Historic District (Listed)

Essex County - Fort Ticonderoga (NHL)
Fort St. Frederic (NHL)
Fort Crown Point (NHL)
Ironville Historic District, Ironville (Listed)
Adirondack Ironworks, Tahawus (Proposed)
John Brown Farm, North Elba, Lake Placid (Listed)

Warren County - North Creek Railroad Complex, North Creek (Proposed)

Hamilton County - Sagamore, Racquette Lake (Proposed)

Oneida County - Fort Stanwix, Rome (N.P.S.)
Driskany Battlefield, East of Rome (Listed)
Gansevoort-Bellamy Historic District, Rome (Proposed)



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
P. O. BOX 1026, HARRISBURG, PENNSYLVANIA 17120

EXECUTIVE DIRECTOR

June 16, 1975

Mr. Richard D. Rieke
Assistant Regional Director
Lake Central Region
Bureau of Outdoor Recreation
U. S. Department of the Interior
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Rieke:

In response to your recent request for a list of archeological and historical sites along the proposed North Country Trail, we would appreciate a more detailed map of the area indicating the proposed boundaries of the trail. The map submitted to us is simply too general for us to supply the information requested. In regard to an impact statement of the trail location, we would appreciate additional information regarding proposed construction along the trail. Once this additional information is submitted, we will then be happy to provide the historical and archeological data as requested.

Sincerely yours,


WILLIAM J. WEWER

**THE STATE HISTORICAL
SOCIETY OF WISCONSIN**

816 STATE STREET / MADISON, WISCONSIN 53706 / JAMES MORTON SMITH, DIRECTOR

State Historic Preservation Office

June 5, 1975

Mr. Richard D. Rieke
Assistant Regional Director
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

SHSW 0183-75

Dear Mr. Rieke:

Thank you for your letter of May 21, 1975, regarding the proposed North Country Trail in Bayfield, Ashland and Iron counties.

The map you sent with the letter lacked sufficient detail to identify the proposed 10-mile-wide corridor accurately. We suggest you submit the appropriate USGS quadrangles (7 1/2' where available, otherwise 15') with the boundaries of the corridor drafted upon them. When we receive these maps, we will be able to supply you with such information as we have in our files regarding affected sites.

The State Archeologist, a member of our staff, believes that there may well be archeological sites located in the corridor. However, the above maps are required to determine their location.

No historical and architectural survey of the general area involved has been undertaken. We strongly recommend that the Bureau of Outdoor Recreation include such survey in its planning budget. We can help the Bureau locate suitable persons or, alternatively, serve as subgrantees to execute the requisite survey work. We would be happy to supply you with a proposed budget and time schedule upon receipt of the USGS maps referred to above.

Thank you for your inquiry. We will respond with more definitive information as soon as we receive detailed maps.

Sincerely,


James Morton Smith
State Historic Preservation Officer

JMS:jmdd



THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D. C. 20410

November 19, 1974

Honorable Rogers C. B. Morton
Secretary of the Interior
Washington, D. C. 20240

Dear Mr. Secretary:

Thank you for the opportunity to review the draft environmental impact statement and the proposed report on the North Country Trail.

The North Country Trail will be a major contribution to the citizens of America. Your Department has given significant consideration and detailed planning to the environmental factors involved. A commendable variety of uses has been projected with environmental benefits and hazards anticipated in planning for recreational, urban, and scenic areas. I find that appropriate attention has been given to safeguard measures in the processes of acquisition, management, and maintenance.

There are some additional environmental factors which you may wish to have reviewed. You may wish to provide for limited use of motor bikes and horses as a means of providing additional accessibility of travel within specific scenic and recreational areas. Also, in connection with the provision of camping and recreational areas, it may be helpful to consider explicit measures to provide water supply and sanitary facilities, to estimate their possible impact on farms and urban areas, and to specify protective measures.

I trust these comments will be helpful. Although I perceive no major environmental problems arising, because of the high quality of the preliminary documents, I would appreciate receipt of the final report and statement.

Sincerely yours,


James T. Lynn

Letter dated November 19, 1974, from the Secretary of Housing and Urban Development

1. The report recommends against the use of motorcycles and motorbikes because of the high potential for conflict between these and other uses of the trail during the major recreation season.
2. Additional information concerning camping areas is not available at the corridor concept stage. The kinds of information requested by HUD will be meaningful during the route selection stage and will be considered during master planning.



OFFICE OF THE SECRETARY OF TRANSPORTATION
WASHINGTON, D.C. 20590

October 21, 1974

MEMORANDUM FOR: Mr. John D. Cherry
Regional Director
Department of the Interior
Bureau of Outdoor Recreation
Lake Central Region
Ann Arbor, Michigan

SUBJECT: Draft Environmental Impact Statement for
Proposed North Country Trail (INT DES 74-84)
Vermont, New York, Pennsylvania, Ohio,
Michigan, Wisconsin, Minnesota, North Dakota

Thank you for the opportunity to review the draft environmental impact statement for the proposed North Country Trail. We have several concerns which we believe merit further attention in the final statement. Our first concern relates to snowmobiling. The final report should discuss and evaluate whether and where snowmobiling would be permitted. Other subjects which deserve treatment are the following: measures to control erosion and protect water quality; such economic and social effects as safety, vandalism, and police protection; the effect which the proposed trail would have on private property. | 1

Finally, we hope that each State highway agency would have the opportunity to review plans for the trail as it intersects highways. Such review would cover aspects such as adequate sight distances, safe crossing provisions, and adequate parking where heavy use is anticipated. | 2

We look forward to seeing the final environmental impact statement for this project. | 3

for *Joseph Convisser*
Martin Convisser, Director
Office of Environmental Affairs
Office of Environment, Safety,
and Consumer Affairs

Memorandum dated October 21, 1974, from the Office of the Secretary of Transportation

1. Additional discussion of factors to consider in relation to snowmobile use has been incorporated into the final environmental impact statement.

Because of the conceptual nature of the proposal, we do not believe that the several subjects listed can be discussed in more detail at this time.

2 & 3. Additional Federal and State coordination will occur at the route selection stage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

31 OCT 1974

OFFICE OF THE
ADMINISTRATOR

Mr. John D. Cherry
Regional Director
Lake Central Regional Office
U.S. Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Sir:

The Environmental Protection Agency has reviewed the draft environmental impact statement (EIS) on the proposed North Country Trail.

Generally we have no objection to the project as proposed, however, we do have some comments and recommendations on the EIS which we offer for your consideration at this time. Accordingly, we are assigning the rating of LO-2 to the EIS. This means that EPA has no objections to the proposed action, but believes the draft EIS contains insufficient information.

Most importantly, we concur with the restrictions placed upon snowmobiles primarily because of the undesirable noise levels generated by their operation. Since enforcement of such restrictions poses a significant problem, we feel that the EIS should address the measures that could be employed effectively to restrict snowmobiles and other off-road vehicles from designated trails. Also, the EIS should recognize cross country skiing as an alternative to snowmobile use.

The EIS should analyze analogous problems that have arisen with existing National Trails. During this planning stage, it appears that a significant number of problems could be prevented. For example, ecologically fragile areas, such as bald eagle nesting sites, should be identified and avoided. Also, provisions could be incorporated so as to preserve unique areas beyond the trail right-of-way. Scenic easements or acquisition could be utilized where appropriate to maintain a high quality recreational experience.

Water quality could be affected in the vicinity of crossings as well as along portions of the trail in close proximity to streams. The EIS should discuss the types of stream crossings that will be utilized and the criteria for selection. Emphasis should be placed upon the types of crossings that will minimize environmental impact and that will be, at the same time, safe and visually pleasing.

3

Several questions remain unanswered regarding the establishment of camping areas, sources of drinking water, and the installation of sanitary facilities. How will these areas be maintained and inspected for compliance with State Board of Health requirements? What type of sanitary facilities will be installed?

4

Finally, in future EIS's of this type, we suggest that the U.S. Bureau of Outdoor Recreation include specific information on the corridor interrelationships between the proposed trail and existing recreational areas such as wild and scenic rivers and/or national parks and forests. Consideration should be given to the impacts of future visitation, carrying capacity, and the quality of recreational experience at existing recreational areas that would be caused by the development of the trail. Also, we would like to know how the proposal (at this stage as well as future stages of development) interfaces with Section 4f determinations of the Department of Transportation Act (P.L. 89-670).

5

6

Thank you for the opportunity to review the draft EIS. Please contact us if you wish to discuss our comments.

Sincerely yours,



Sheldon Meyers
Director
Office of Federal Activities

Enclosure

Letter dated October 31, 1974, from the Environmental Protection Agency

1. Factors which administrators should consider before allowing snowmobiles have been suggested in the final environmental impact statement and the report.

Stiles and labyrinth gateways, two methods of restricting unwanted motor vehicles, were discussed under Mitigating Measures. Probably the most effective way to restrict undesirable use is through user education.

The draft environmental impact statement stated (page 74) that snowmobile use might be permitted if other winter time uses of the trail were low. The report recommended that alternate trails be provided if there was a large demand for both vehicular and nonvehicular use. This recommendation was also discussed on page 74 of the draft statement. The final environmental impact statement has been revised to emphasize this point.

2. A brief discussion on problems and impacts on the Appalachian Trail in the Adirondack High Country has been included in the final environmental impact statement. See Section III.M., page 100.

Actual on-ground location of the trail has not been determined. That ecologically fragile areas should be avoided was discussed in the draft environmental impact statement (page 81) which states "The corridor concept itself permits the careful location of the actual trail tread based on actual site conditions. The deliberate avoidance of ecologically fragile areas is an essential part of tread location."

3. We have added general reference to stream crossings. It is premature to state what kinds of crossing will be utilized at the corridor concept stage. It is recommended that river crossings be on bridges.

4. Questions concerning establishment of camping areas, sources of drinking water, and installation of sanitary facilities will be a function of master planning. While specific information is not available at the conceptual stage, we have added a general reference to the need for water and sanitary facilities (see page 92).

5. Specific information on the corridor interrelationship between the proposed trail and existing recreation areas is not available at the conceptual stage. Given a 10-mile wide corridor, many areas, especially along rivers, can be entirely by-passed if necessary. Consideration of specific impacts will be a part of the route selection process.

6. A discussion of Section 4(f) can be found in Section III.K. Impact on Highways and Utility Lines, page 78 of the draft environmental impact statement. The Department of Transportation and the individual State highway departments will have an opportunity to make an input at the route selection stage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10007

OCT 22 1974

Mr. Frederick J. Bender
Acting Regional Director
U.S. Department of the Interior
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Bender:

We have reviewed the draft environmental impact statement (EIS) for the proposed establishment of a North Country Trail and have the following comments.

The EIS proposes that the existing North Country Trail in the Chequamegon National Forest be incorporated into the project. This trail presently sustains snowmobile use which would conflict with National Scenic Trail status. We suggest that instead of building a new snowmobile trail through Chequamegon National Forest as proposed, a new hiking trail be constructed. This would be both economically and environmentally more acceptable than building a new snowmobile trail. Furthermore, there is no guarantee that snowmobile users would voluntarily restrict their activities to those sections of trails designated for snowmobile use. Snowmobile users tend to travel in non-trail areas. Serious harassment of moose, elk, and deer as well as hikers by snowmobilers can occur. These effects would seem to contradict the efforts of the Fish and Wildlife Service, whose activities encourage wildlife conservation.

1

The EIS contains a conflict in regard to the intended width of the trail if used for hiking purposes. On page 8, it is stated that tread width will be at least 18 to 24 inches. On page 72, it is stated that the tread width will be 36 inches. The final EIS should clarify this inconsistency.

2

We recommend that the tread width be kept as narrow as necessary, yet wide enough so that the little used portions of the trail will not be overgrown by the surrounding vegetation. The heavily used sections of the trail may suffer from trail widening and deepening. Flat sections of the trail will widen unless adequate drainage is provided

3

since trail users tend to walk on the edges of puddles. Consequently, the puddles grow in size, and the trail widens with use. The final EIS should state how this problem will be mitigated. 3

The types of tread surface that will be used for the trail should be specified in the final EIS. The use of gravel or asphalt will greatly increase environmental effects. Also, the hauling in of construction materials by hand along trails will be extremely expensive. 4

The proposed trail should avoid environmentally sensitive areas such as nesting grounds for such endangered species as the bald eagle and the peregrine falcon. Ecologically fragile sand dunes should also be avoided unless precautionary measures such as boardwalks are used. These measures should be discussed in detail in the final EIS. 5

Use of the trail by horses and bicycles may be incompatible with hiking use. At the present time, neither horses nor bicycles are allowed on the Appalachian Trail. The same high standards applicable to the Appalachian Trail should be applied to the North Country Trail. 6

Thank you for the opportunity to review this statement. All information requested should be included in the final EIS. In addition, the final statement should not be released until specific trail designations for scenic or recreational uses have been made. Three copies of the final EIS are requested for review.

Sincerely yours,

Paul H. Arbesman
Paul H. Arbesman
Chief

Environmental Impacts Branch

Letter of October 22, 1974, from Environmental Protection Agency,
Region II

1. The EIS does not propose that the existing North Country Trail in the Chequamegon National Forest be incorporated into the project. This is a possibility and if it is used and if it is designated scenic, snowmobiles could not be used. The report does not propose to build a new snowmobile trail through the Chequamegon National Forest. The report recommends that if there is a large demand for both vehicular and nonvehicular use, alternate trails should be provided. This could include rerouting snowmobile use onto logging roads. These are management decisions which cannot be treated in the conceptual state.

There is no guarantee that any user will restrict his or her activity to the trail or specific segment of the trail. Potential misuse of the trail is a recognized problem which depends upon proper management to resolve.

2. Construction standards for a trail tread width for hiking is shown as 18 to 24 inches. Clearance (also on page 8) is additional.

3. Recommended standards for trail construction, including drainage and trail maintenance, were discussed in the draft environmental impact statement on pages 8 and 10, respectively.

4. The use of tread surface is a management decision. Surface material could vary from in-place soil to limestone fines, a substance frequently used for trails on abandoned railroad rights-of-way.

5. The avoidance of environmentally sensitive areas was discussed in the draft. See response No. 2 to similar comment from EPA, Washington.

6. There may be conflicts between horses, bicycles, and hikers. We believe that some sections of the trail will be multiple use. This particularly applies to abandoned railroad rights-of-way. Because of the demand for different types of trail activities, trail users will have to coexist and be tolerant and considerate of other users. Good management can minimize conflicts.

Equestrian use is permitted on trail segments of the Pacific Crest National Scenic Trail and is a recognized use for the proposed Continental Divide National Scenic Trail. Bicycle use is planned for portions of the proposed Potomac Heritage National Scenic Trail. High trail standards do not preclude bicycles and horses, although there would be segments of trail where they would not be permitted or practical.

FEDERAL POWER COMMISSION
WASHINGTON, D.C. 20426

IN REPLY REFER TO:

Mr. John D. Cherry
Regional Director
Bureau of Outdoor Recreation
Department of the Interior
3853 Research Park Drive
Ann Arbor, Michigan 48104

001.24.1574

Reference: D 3819 NCT

Dear Mr. Cherry:

This is in reply to Acting Regional Director Bender's letter of September 3, 1974, addressed to the Commission's Advisor on Environmental Quality, inviting comments on the draft environmental impact statement for the proposed North Country Trail (DES 74-84) which would originate at the Appalachian Trail in Vermont; traverse the States of New York, Pennsylvania, Ohio, Michigan, Wisconsin, and Minnesota; and terminate at the proposed Lewis and Clark Trail in North Dakota.

These comments of the Federal Power Commission's Bureau of Power are made in accordance with the National Environmental Policy Act of 1969 and the August 1, 1973, Guidelines of the Council on Environmental Quality. Our principal concern with proposals affecting land and water resources is the possible effect of such proposals on bulk electric power facilities, including potential hydroelectric developments, and on natural gas pipeline facilities.

As presented in the draft environmental statement, a Federal-State field task force has identified a 3,246-mile corridor, averaging ten miles in width, within which the proposed trail would be located. In selecting the final trail alignment, those facilities, including water resources developments and power transmission lines, that could detract from the trail experience would be avoided. Also, in any trail segments acquired via the Land and Water Conservation Fund, the development of future utility lines could be restricted or precluded. The draft statement mentions that reservoirs might be proposed that could conflict with the trail. However, it is further stated that such reservoirs would not necessarily be precluded since the trail could be relocated. The draft statement also notes that mineral extraction within the trail right-of-way or within view of the trail could be curtailed.

Mr. John D. Cherry
Page 2

The Commission staff notes that numerous major transmission lines, including lines up to 765 kilovolts, as well as a number of natural gas pipelines under Commission jurisdiction, cross the proposed trail. According to information available to the Commission, including the 1970 National Power Survey, additional transmission line crossings undoubtedly will be required in the future. Additional natural gas pipeline crossings may also be needed. While it would not be in the public interest to preclude construction of these needed facilities, it should be possible to construct the facilities through treatment measures such as landscaping and design of structures to minimize their impact on the trail experience. Also, although the corridor traverses areas with known natural gas deposits, it should be possible, by means of slant drilling, to extract natural gas without adversely affecting the trail environment.

2

Very truly yours,


T. A. Phillips
Chief, Bureau of Power

Letter dated October 24, 1974, from the Federal Power Commission

1 & 2. The F.P.C. states that their concern is with the possible effect of the proposal on both electric power facilities and natural gas pipelines. They indicate that many existing and proposed power lines and pipelines cross the trail corridor, and that while the proposed lines should not be precluded, these facilities can be constructed with treatment measures such as landscaping and design of structures to minimize their impact on the trail experience. The F.P.C. also states that it should be possible, by means of slant drilling, to extract natural gas without adversely affecting the trail environment.

While the proposal makes no specific recommendations regarding future power lines or pipelines, the location of such lines would have to be considered by the administering agency. We would agree with the F.P.C. that power lines and pipelines can be constructed in a manner to minimize their impact.



STATE OF MICHIGAN
OFFICE OF THE GOVERNOR
LANSING

WILLIAM G. MILLIKEN
GOVERNOR

October 23, 1974

The Honorable Rogers C. B. Morton
Secretary of the Interior
U. S. Department of the Interior
Washington, D. C. 20240

Dear Rog:

In this era of greatly-desired and needed outdoor recreational opportunities, we are pleased to receive the Bureau of Outdoor Recreation proposal for a National Scenic Trail spanning both peninsulas of Michigan. Surely, a multitude of recreational opportunities can be provided by such a facility. Moreover, it can have a spiritual or psychological uplift on the people of the state, fostering pride in and attachment to their state and region, which in these complex and problem-strewn times is a welcome change.

You requested a review and comments on the Department of Interior's proposed report on the North Country Trail Study and the draft environmental statement prepared on this proposal. The comments that follow, in which I concur, stem from our Department of Natural Resources, which is charged with outdoor recreation planning in Michigan, and several of whose staff participated with Bureau people in the selection of the general trail location.

We agree generally with the concept, standards, and estimated impacts as covered in both the trails report and draft environmental statement. While there are alternative corridors for the trail in both the Upper Peninsula and Lower Peninsula of Michigan, the general route selected traverses much of the more scenic area of the state, and thus best fits the National Scenic Trail objectives.

In the 793-mile long segment in Michigan, we are, however, troubled about acquisition or control. More specifically, we are concerned about acquiring or otherwise controlling the land presently in private ownership. We note on page 7 of the trails report that "Segments of trail on nonfederal land would be established on an optional basis through state, local, or private efforts." Of course we expect to make available the portion of the trail that is on state land in the same way as you make available that portion traversing Federal lands.

But acquiring or otherwise achieving effective control of the remaining 341 miles on private land certainly poses problems to which we see no immediate solution. With state and local budgets already stretched to the limit, significant acquisitions of trail sections by these governments do not appear likely in the foreseeable future. Acquisition costs could also

The Honorable Rogers C. B. Morton
Page 2
October 23, 1974

be a major factor in the ultimate trail location; i.e., costs may dictate alternative routes and even a more direct corridor. Fee acquisition costs would be particularly high near urban areas and in resort areas such as those bordering Lake Michigan. The use of abandoned railroad rights-of-way for portions of this trail (page 101 of trails report) could help to alleviate this cost burden and simplify acquisition problems.

In any case, consideration of state financing of portions of the North Country Trail would have to be balanced against all the recreation needs of Michigan, including needs for alternative types and locations of trails. State funds, even when matched with Federal funds, are not sufficient for all legitimate recreation needs, and our attention must, therefore, be directed toward optimizing the return on the recreation dollar. We would hope that "private efforts" can play a more significant role than is presently indicated.

The trails report also recommends that certain percentages of the trail route be (1) obtained as easements, and (2) controlled through voluntary agreements with private landowners (page 105). Our experience in Michigan indicates that easements often cost nearly as much as outright acquisition of fee title, and that voluntary agreements are often broken, leaving a trail route in limbo and even the trail itself in jeopardy.

We are particularly pleased to note that the trail concept has been revised to allow parts of a National Scenic Trail to be a National Recreation Trail and thus allow snowmobiling use in trail segments particularly suited for that purpose. This adaptation of the trail concept certainly recognizes realities in the northern states, where snowmobiling is the most popular trail sport in wintertime and by far the greatest user of trail space.

In spite of the concerns and reservations cited above, we support the concept of the North Country Trail and welcome its passing through Michigan. We hope that ways can be found to bring it into being, and we will give it whatever support we can, commensurate with our other recreation needs.

Warm personal regards.

Sincerely,


Governor

Letter of October 23, 1974, from Governor William Milliken of Michigan

These comments constitute a review of the proposed report. The concerns expressed herein will be considered by the Secretary of the Interior and the national North Country Trail Council during route selection and master planning.



STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
CENTENNIAL OFFICE BUILDING • ST. PAUL, MINNESOTA • 55155

February 10, 1975

Mr. John D. Cherry, Regional Director
United States Department of Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

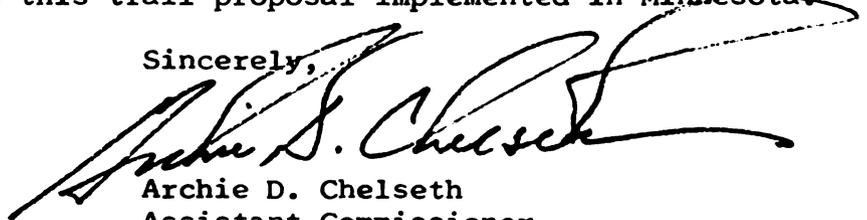
The Department of Natural Resources has reviewed the draft Environmental Impact Statement on the North Country Trail, and generally concurs with the contents. We are looking forward to the federal approval and submittal to Congress for authorization of the North Country Trail. We feel that the description of the trail is adequate and does hint at some of the potential in the State of Minnesota for such a trail.

In the general designation of the trail, there is mention that various types of uses would not have to be continuous. We would agree with this statement except in the case of the walking or hiking aspects. We feel that users should be able to walk the entire length of the trail.

The reference to dual use of trails should be clarified since some uses are not compatible on the same treadway. We would recommend in those portions where there is horseback riding, bicycling, cross-country skiing and snowmobiling that the treadways be separated from each other. We feel the original legislation is broad enough to allow this separation, and we also feel this would improve the quality of the experience for both types of user. While this may not be possible over extended lengths, we feel it would be completely reasonable in those portions that have state or federal ownership. In fact, this is what is happening at the present time in Itasca State Park and the response we have received is excellent, even after only a short period of operation.

We look forward to seeing this trail proposal implemented in Minnesota.

Sincerely,



Archie D. Chelseth
Assistant Commissioner

cc: Robert L. Herbst
C. B. Buckman
Division Directors
Merlyn Wesloh
Roger Lorenz
Milt Stenlund
PERT Members

Letter dated February 10, 1975, from the Minnesota Department of
Natural Resources

1. The decision regarding multiple use of trail segments would be made by the administering agency. Alternate trails (which could be separate treadways) for motorized use has been recommended in the report. This recommendation will be available to the trail council for their consideration.



STATE OF NEW YORK
EXECUTIVE CHAMBER
ALBANY 12224

T. N. HURD
SECRETARY TO THE GOVERNOR

November 26, 1974

Dear Mr. Secretary:

Governor Wilson has asked me to thank you for forwarding to him the North Country Trail Report and environmental statement. I apologize for the delay in responding.

Please find enclosed our comments on these documents which have been prepared by members of the State's Department of Environmental Conservation.

We appreciate the opportunity to present our views.

Sincerely,

T. N. Hurd

Honorable Rogers C. B. Morton
Secretary of the Interior
Washington, D. C. 20240

Enclosures

Comments on
The North Country Trail Report

by

New York State Department of Environmental Conservation

It is important from our point of view that any long trail such as the North Country Trail have parking facilities at major road crossings which will enable hikers to utilize portions of the trail as their time permits. From our experience with the Northville-Placid Trail there will be relatively few who will be able to travel its entire length at a given time.

The 200-foot proposed right-of-way may in some cases be insufficient to provide adequate trail protection.

Within the corridor concept as noted on the New York Map, the Trail routing appears to cross some private club lands in the southwestern Adirondacks where access may not be available or, at the least, most difficult to obtain.

We are particularly concerned at this time about both the costs of acquisition and construction and the annual maintenance costs thereafter. This concern is reflected in the difficulties involved in obtaining sufficient funds to upgrade and properly maintain existing trail mileage in this State at the present time.

However, we do not concur with the alternate proposal to establish a North Country National Scenic Trail which would designate the Secretary of the Interior and the Federal Government as the Administrators of such a facility.

The administration and maintenance of the North Country Trail could be accomplished by interested volunteer trail clubs with specific sections assigned.

Comments on
The North Country Trail Environmental Statement

No conflicts are noted in trail design criteria which appear to meet or exceed our established standards.

We visualize the need for several large suspension type bridges to cross major streams and wonder whether the costs of delivery of materials and construction at remote sites has been considered.

No conflicts are seen in the various impact statements provided. However, it is our feeling that vandalism and littering might present problems beyond that indicated in the report. | 2

The only other area of potential environmental concern is in the manner that streams are crossed. Therefore, the Department of Environmental Conservation Office of Environmental Analysis requires the right to review plans as they develop. | 3

Letter dated November 26, 1974, from Office of the Governor of New York

1. Cost estimates for construction are average figures based on all types of trail construction which might be needed along a mile of trail, including an occasional bridge over a stream, but not major river crossings.
2. Vandalism and littering are acknowledged as potential problems. The State of Ohio reports (page 196) that these problems are most severe near cities and in areas of intensive day use.
3. We have added a general reference to stream crossings, Section III.
C. Impact on Air and Water Quality, page 92. Types of crossings would depend on local conditions and management decisions. It is recommended that river crossings be on bridges.

MEMBERS

RICHARD W. LAWRENCE, JR.
CHAIRMAN
JAMES L. BIGGANE
JAMES R. BIRD
WHITMAN DANIELS
~~XXXXXXXXXXXX~~
NEAL L. MOYLAN
PETER S. PAINE, JR.
MARY F. PRIME
JOHN STOCK
JOSEPH P. TONELLI
RICHARD A. WIEBE

STATE OF NEW YORK
EXECUTIVE DEPARTMENT
ADIRONDACK PARK AGENCY
P.O. BOX 99
RAY BROOK, NEW YORK 12977
(518) 891-4050

RICHARD A. PERSICO
EXECUTIVE DIRECTOR

GEORGE D. DAVIS
DIRECTOR OF PLANNING

December 2, 1974

Mr. John D. Cherry, Regional Director
Lake Central Regional Office
Bureau of Outdoor Recreation
Department of the Interior
3853 Research Park Drive
Ann Arbor, Michigan 48104

RE: INT DES 74-84

Dear Mr. Cherry:

Through an oversight the New York State Clearinghouse did not send a copy of your Draft Environmental Statement 74-84, Proposed North Country Trail, to the Adirondack Park Agency for review. Consequently, we missed your deadline for comment. We would appreciate it if despite our tardiness our comments could be included in the final statement.

The Adirondack Park Agency consists of eleven commissioners, eight private citizens and the State Commissioners of Commerce, Planning Services, and Environmental Conservation. The statute establishing this State agency mandates that it develop "long range park policy in a forum reflecting state-wide concern." The statute further requires the Park Agency, in cooperation with the Department of Environmental Conservation, to develop a Master Plan for State land to guide the development and management of the State land within the Adirondack Park. This has been done and a copy is enclosed. The Park Agency establishes basic policy governing Adirondack State land and the Department of Environmental Conservation manages the land in a way that implements that policy. In addition, the statute requires the Park Agency to review most proposed development on private land and grant a permit when that development conforms to the Land Use and Development Plan. Finally, under a separate statute, the Park Agency has studied 1,100 miles of river for inclusion in the State's Wild, Scenic, and Recreational River System. As the Park Agency is a policy-making, land use regulating body, our comments will focus upon the policy implementations of DES 74-84 for the Adirondack Park.

1. The Draft Environmental Statement fails to discuss in what way the proposed North Country Trail would relate to the Adirondack Park State Land Master Plan or the New York State Wild, Scenic, and Recreational Rivers System. | 1

2. The Draft Environmental Statement is ambiguous regarding whether the proposed action, Congressional authorization of the trail concept and corridor, would pre-empt state policy. | 2

D.E.S. says:

Segments of trail on non-federal land would be established on an optional basis through state, local or private efforts. p. 1

Non-federal segments could become part of the North Country Trail upon appropriate application to the Secretary of the Interior. p. 3

Tread location within the corridor should be determined by management organizations based on actual ground conditions and agency management policies. p. 4

Selection and implementation of standards for trail construction would be the responsibility of the agency or organization administering the trail segment involved. p. 7

This seems to imply that New York can choose to participate in the North Country Trail at its option and in whatever manner conforms with its overall policies, practices, and priorities.

However, the D.E.S. also says:

The Secretary of the Interior...would coordinate the selection of a trail route within the corridor recommended in the Study report and develop guidelines for the acquisition development, and management of the trail. p. 1

In all cases where the trail route passes through state parks...the states would be encouraged to develop and maintain a route, in accord with the Secretary of the Interior and the national council. p. 12

It is expected that for those lands in public ownership, an agreement in perpetuity would be obtained. p. 13

A similar goal of ten years for completing the trail on non-federal public land is also desirable. p. 14

The statements imply that the trail must conform to federal standards regardless of possible conflict with those of the state.

If it is the intention that the federal control prevail, then the proposal should say that clearly and should also include full federal funding for trail acquisition and maintenance. Likewise, if it is the intention that state policies prevail that should be made explicit.

3. The Adirondack Park Agency endorses in principle the opening of a new trail in the southern portion of the Park. The Agency would like to see usage diverted from the overused High Peaks area to portions of the Park presently under-utilized.

Yours truly,



George O. Nagle
Governmental Liaison Specialist

GON/1s

cc: Richard Persico
George Davis

Enc: State Land Master Plan and Map

Letter dated December 2, 1974, from the Adirondack Park Agency

1. The location of the North Country Trail corridor through the Adirondacks was selected by the Federal-State task force which included a representative of the State of New York. The Adirondack Mountain Club was also consulted on the location. During the route selection stage, the specific policies of the Adirondack Park Agency will be considered. Policies dealing with State lands and programs, including wild, scenic, and recreational rivers, will also be considered. The recommended State and national North Country Trail councils provide an opportunity for this input.

2. The North Country Trail is a Federal proposal. The Secretary of the Interior, with national and State North Country Trail councils, will provide overall coordination, including route selection and recommended construction guidelines. The national council will be composed of appropriate State and Federal agencies; thus each State will work with the Secretary in locating a trail route. Trail segments on non-Federal lands would be established on an optional basis. It is not the intention of this proposal to pre-empt State policy but to work with State and local governments in developing a mutually agreeable plan.

NORTH DAKOTA STATE PLANNING DIVISION

STATE CAPITOL—FOURTH FLOOR—BISMARCK, NORTH DAKOTA 58501
701 224-2818

October 14, 1974

STATE INTERGOVERNMENTAL CLEARINGHOUSE "LETTER OF COMMENT"
ON PROJECT REVIEW IN CONFORMANCE WITH OMB CIRCULAR NO. A-95

To: USDA, Bureau of Outdoor Recreation

STATE CLEARINGHOUSE PROJECT NUMBER: 7409069414

Mr. John D. Cherry
Regional Director
USDA, Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

Subject: Draft EIS; Proposed North Country National Scenic Trail, INT DES 74-84.

This Draft EIS was received in our office on September 6, 1974. An extension of review time was requested and received September 12, 1974.

In the process of the A-95 review, the attached comments were received from the Lake Agassiz Regional Council, State Outdoor Recreation Agency, State Highway Department, the North Dakota Park Service and Mr. H. R. Morgan.

This document and attachments constitute the comment of the State Intergovernmental Clearinghouse, made in compliance with OMB Circular No. A-95.

Sincerely yours,

Bonnie E. Austin
Miss Bonnie E. Austin
Associate Planner

BEA/ds

Attachments

cc: Mr. John Green, EPA, Denver

Letter dated October 14, 1974, from the North Dakota State Planning Division

As the official State clearinghouse, the State Planning Division coordinated the review of the draft statement by State and local governmental agencies. Substantive comments by these agencies are responded to separately.

FROM: STATE INTERGOVERNMENTAL CLEARINGHOUSE
STATE PLANNING DIVISION
STATE CAPITOL
BISMARCK, NORTH DAKOTA 58501

Date Received

ENVIRONMENTAL IMPACT STATEMENT TO BE REVIEWED



TO: Robert Bradley
Highway Department
Bismarck, ND

ISSUED BY: Department of the Interior

DATE: September 6, 1974

NAME OF PROJECT: Draft EIS: North Country Trail

The attached Environmental Impact Statement is referred to your agency for review and possible comments. If you consider it satisfactory, please check the box labeled, "no comment." Otherwise, please check one of the other appropriate boxes. Your cooperation is asked in completing this memo and returning it to the State Intergovernmental Clearinghouse within 10 days from date of receipt. If no response is received within 15 days of date of notification it will be assumed you have no comment.

No comment

Meeting desired with applicant

Comments submitted herewith

1. Specific comments which are to be attached to the review statement which will be submitted by the State Intergovernmental Clearinghouse: (Use reverse side or separate sheets if necessary)

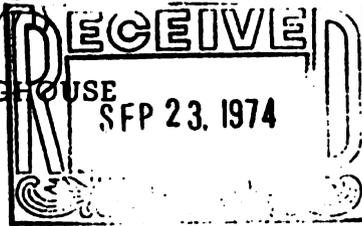
We are concerned about the safety aspect where the trail will cross major Highways and at location where Highway bridges may be used by the trail to cross major streams. When location studies begin within the proposed ten mile wide corridor it is requested the State Highway Department be afforded input at the onset of those studies.

1

2. Reasons why meeting is desired with applicant:

Reviewer's Signature: *R. Bradley*
Title: Chief Engineer

Date: 9-11-74
Tele: 224-2584



PNRS NO.

FROM: STATE INTERGOVERNMENTAL CLEARINGHOUSE
STATE PLANNING DIVISION
STATE CAPITOL
BISMARCK, NORTH DAKOTA 58501

Date Received

ENVIRONMENTAL IMPACT STATEMENT TO BE REVIEWED



TO: Mr. Robert Conklin, Project Coordinator
Lake Agassiz Regional Council
Fargo, North Dakota 58102

ISSUED BY: Department of the Interior

DATE: September 20, 1974

NAME OF PROJECT: Draft EIS: Proposed North Country Trail

The attached Environmental Impact Statement is referred to your agency for review and possible comments. If you consider it satisfactory, please check the box labeled, "no comment." Otherwise, please check one of the other appropriate boxes. Your cooperation is asked in completing this memo and returning it to the State Intergovernmental Clearinghouse within 10 days from date of receipt. If no response is received within 15 days of date of notification it will be assumed you have no comment.

- No comment
- Meeting desired with applicant
- Comments submitted herewith

1. Specific comments which are to be attached to the review statement which will be submitted by the State Intergovernmental Clearinghouse: (Use reverse side or separate sheets if necessary)

THE LAKE AGASSIZ REGIONAL COUNCIL REQUESTS A 30 DAY EXTENSION TO FURTHER REVIEW THE IMPACT STATEMENT.

2. Reasons why meeting is desired with applicant:

Reviewer's Signature: Mark A. Beardsly Date: OCT. 3, 1974
Title: ASSISTANT PLANNER Tele: 701-235-7885



1005 West Sweet Avenue
Bismarck, North Dakota 58501

September 25, 1974

PERSONAL STATEMENT

on

DEPARTMENT OF THE INTERIOR DRAFT ENVIRONMENTAL STATEMENT
(INT-DES-74-84)

Re: Proposed North Country Trail

Being extremely familiar with Segment S-T in North Dakota, particularly that portion extending from Fort Abercrombie to where the proposed trail joins the Missouri River, it is my judgment that it is well laid out to take advantage of both native flora and the history of the region.

The proposed trail passes through the farm (which I still own) on which I was born and raised and where my paternal grandparents located in 1878, and where my grandfather acted as postmaster at Barrie in Richland County (Barrie Twp., Section 20-136-51).

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "H. R. Morgan".

H. R. Morgan

HRM:b



DEPARTMENT OF
NATURAL RESOURCES

JOHN J. GILLIGAN
Governor

WILLIAM B. EYE
Director

Director's Office

FOUNTAIN SQUARE • COLUMBUS, OHIO 43224 • (614) 469-3770

October 25, 1974

Honorable Rogers C.B. Morton
United States Department of the Interior
Washington, D.C. 20240

SUBJECT: D3819 North
Country Trail

Dear Secretary Morton:

Governor Gilligan has asked that I respond to your Department's report and Draft Environmental Statement on the proposed North Country Trail (INT DES 74-84, dated August 30, 1974), which accompanied your letter of September 17, 1974. Except for the comments that are identified as applying to the report, all comments apply specifically to the Draft Environmental Statement. Also, in most cases, we have limited our comments to the Ohio segment of the proposed trail.

We believe that the proposal for a North Country Trail is commendable and that the Trail will be of benefit to the citizens of Ohio. We wholeheartedly support the concept. However, while the proposed route alignments and specifications for the Trail appear to be reasonable, we do have a number of concerns. For example, one concern is whether the estimates of costs are reasonable. Another concern is whether it is realistic to expect that a continuous trail can be assembled and maintained by a council of organizations as loose as that proposed.

It is our opinion that the discussion of the identified environmental impacts was so general that it failed to depict accurately the undue pressures on resources that can be expected to develop. What will be the impact of the Trail on water quality, scenic values, cultural features, land ownership, and use of the Trail by visitors? | 1

We are very concerned about certain uses to which the proposed Trail will be put --- namely, the use of motorized vehicles, especially snowmobiles, on it. Ironically, the Statement addresses the use of motorized vehicles on the Trail, but does not provide for it. The Statement presented five alternatives for trail development, but none of them had provisions for motorized vehicles. | 2

The original task force identified the Trail as a National Scenic Trail, which means that no motorized vehicles would be used on it. The present Environmental Statement states that part of the Trail could be designated a National Recreation Trail and used for snowmobiling purposes. Public Law 90-543, Section 5, subsection (b), directs the Secretaries of the Interior and Agriculture to undertake studies for the purpose of determining the feasibility and desirability of designating various trails as "National Scenic Trails". One of the trails so designated for study was the North Country Trail (Section 5, subsection c, paragraph 6). Section 7, subsection c, in the same law states that the use of motorized vehicles by the general public along any national scenic trail shall be prohibited.

2

The final study report prepared by the Bureau of Outdoor Recreation states that it is possible to establish a North Country Trail that meets National Scenic Trail criteria for its entire length. However, the report goes on to state that it might be desirable to designate sections as recreational, which would permit the use of motorized vehicles.

It is our opinion that there is a contradiction somewhere. The Law stated that the trails were to be scenic trails. If the proposed North Country Trail meets the criteria for a scenic trail, it should be designated as such. On the other hand, if the use of motorized vehicles on the trail is deemed desirable, then the North Country Trail should not be designated as a scenic trail, and this fact should be stated in the final study report. Otherwise, the Law and the study appear to be to no avail.

We have the following additional reservations and questions about the proposed use of motorized vehicles on the Trail: How will snowmobiling be controlled during the winter? If motorized vehicles are allowed during the winter, will it be possible to control or prevent their use during the summer? While flexibility in the uses to which the Trail could be put would increase its utilization, the primary uses of the Trail, such as hiking and similar suitable activities that do not require motorized vehicles, could be jeopardized.

3

We wish to offer the following miscellaneous comments:

- (1) The development of second homes in Hocking County, to some extent in Ross County, and along the Ohio River, is likely to increase.
- (2) Grand Lake St. Marys and Lake Loramie, which are situated on Section I-J (Piqua to the Ohio-Michigan line) were constructed about 130 years ago.

4

5

Honorable Rogers C.B. Morton
October 25, 1974
Page 3

- (3) Careful alignment of the trail corridor would reduce, or even eliminate, problems due to sedimentation and the infiltration of animal wastes into streams.
- (4) Littering and vandalism will be most severe near cities and in areas used intensively during the day. State lands within the trail corridor are presently staffed with maintenance and operations personnel. Long-distance, remote trails, which are considerably more difficult to maintain, suffer considerably less damage in Ohio than the shorter, day-use trails, probably because of the type of people who use the trails and the dispersion of users. Litter and vandalism can be expected to be more of a problem than human waste.

We are grateful for this opportunity to review and comment on your Department's report and Draft Environmental Statement on the proposed North Country Trail. We hope that our comments will assist you in your efforts to establish the Trail.

Sincerely,



WILLIAM B. NYE
Director

WBN:d1w

Letter dated October 25, 1974, from the Ohio Department of Natural Resources

1. The discussion of impacts at the corridor concept stage was general because actual impacts will depend on a number of variables such as the actual tread location, extent of acquisition, extent of development, and types and amount of trail use. These variables cannot be determined at the present time. An opportunity for a more detailed impact statement will occur at the route selection stage if it is determined that route selection is a major Federal action according to the provisions of the National Environmental Policy Act. As discussed in Section I.A.3, "Compliance With National Environmental Policy Act," if Federal lands or funds are involved, an environmental assessment or, if required, an environmental impact statement would be prepared during the route selection stage. Potential environmental problems will be considered during route selection and master planning.
2. The Federal-State task force did determine that the development of a trail along the general route identified would be both feasible and desirable and that it would meet the criteria for designation as a national scenic trail. One factor, perhaps unique to the North Country Trail, is its location in part of the nation's snowbelt where snowmobiling is a major winter pastime, particularly in Minnesota, Wisconsin, and Michigan. With this in mind and adhering as closely as possible to the national scenic trail concept, it was administratively decided that administrators of various trail segments should have the option of allowing the use of snow machines where snowfall is heavy and where the trail received little or no use by winter hikers, skiers, or snowshoers. To allow this one exception to the nonmotorized use provision of the Act, it would be necessary to place such trail segments in the "recreation" trail category as opposed to the "scenic" trail classification. The concept of a national trail with "recreational" and "scenic" components is proposed solely to introduce some flexibility in the use of a national scenic trail route which traverses areas of heavy snowfall.
3. Regulation of snowmobiles will be one of administering agencies responsibilities. Many existing trails, particularly on abandoned railroad rights-of-way, are open to snowmobiles but closed to other vehicles. We have no evidence to indicate that the illegal use of trail bikes on these trails is any greater than it is on trails closed to snowmobiles. Regulation of all uses of the trail is a part of management.
4. Secondary impacts, such as second home development, have been discussed in more detail in the final environmental impact statement (Impact on Land Use, page 95).
5. Correction noted.

October 29, 1974

Re: Draft Environmental Statement - Proposed North
Country Trail - Vermont, New York, Pennsylvania,
Ohio, Michigan, Wisconsin, Minnesota, North Dakota

Mr. John D. Cherry, Regional Director
United States Department of Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104



John J. Gilligan
Governor
Dr. Ira L. Whitman
Director

Dear Mr. Cherry:

The Ohio Environmental Protection Agency has been charged, by the Governor, with the lead agency and review coordination responsibilities for the State of Ohio on Federal Environmental Impact Statements. The above referenced Draft Environmental Impact Statement was reviewed by sections of the Ohio Environmental Protection Agency, the Ohio Department of Natural Resources and the Ohio Department of Economic and Community Development. The following comments constitute those received from the above agencies and have been coordinated under the auspices of the State Clearinghouse.

It is recognized that due to the nature of the proposed action (approximately 3,246 miles of trail traversing eight states) the discussion must remain general in nature. For the most part, that type of discussion outlines the major points and concerns at issue in such an undertaking. While the proposed action is intended to preserve as well as make accessible areas of the eight states through which the trail will traverse, several potential long-term effects merit further consideration and explanation in the Final Statement and/or in supplementary draft documents specific to a State.

The discussion of environmental impacts did not accurately depict many of the pressures that the trail environment will experience. For example, what is the expected nature and degree of impacts resulting from trail and related facilities construction and use on such parameters as water quality, scenic values, cultural features, surrounding land use and ownership? Major concern is directed toward impacts on the trail and immediate environs resulting from misuse eg. littering, illegal dumping, destruction of vegetation etc. While such impacts can be attributed to pedestrian as well as vehicular use, the potential for abuse resulting from vehicular use, specifically motorized vehicles, seems greater. The original task force report identified the trail as a National Scenic Trail thus precluding use of the trail by motorized vehicles. Further discussion would establish the rationale for determining that certain segments of the trail should now be considered for National Recreational status to allow snowmobile

use. It is assumed that prior to designating certain segments of the trail in some or all of the eight states, an in-depth evaluation of the suitability of the segment(s) for snowmobile use will be undertaken by responsible Federal, State and local agencies. Such analysis should include State and/or local regulations, statutes, ordinances with reference to all purpose vehicles etc. Will the Department of Interior, as the lead Federal Agency, establish criteria for evaluation which will additionally allow determination of the need for an Environmental Impact Statement? Without such a mechanism and assumption of ultimate responsibility on the part of the Department of Interior, the process for environmental analysis outlined on pages 3 and 4 becomes non-responsive and unmanageable. Consideration should be given to a continuing evaluation process. As the Federal agencies prepare Environmental Impact Statements (or perform an internal environmental analysis to allow issuance of Negative Declarations), and State and local agencies seeking monetary assistance through the Land and Water Conservation Fund prepare environmental assessments, we would suggest that an integration of such analysis be undertaken on a State by State basis. Such an activity coupled with post implementation analysis should provide valuable information for future use in completion of this trail system and any extensions thereof.

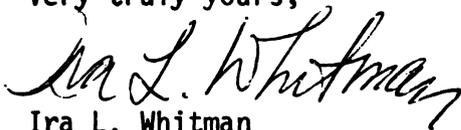
In any event, for the purposes of the general discussion initiated for the overall trail in this Draft, some additional discussion is warranted in the Final. Having expanded the rationale for proposing to allow the use of snowmobiles in certain areas, the control problems and potential solutions should be addressed. For example, if snowmobile use is limited to one area within a larger area how will the use be restricted to that designated area and to a designated path/trail? Furthermore, having determined an area to be suitable for snowmobiling, how will it be possible to disallow or control access to other motorized vehicles during the other seasons? While flexibility of use could increase utilization of the trail (ie. number of people), it could at the same time or over a period of time jeopardize the primary uses of the trail (ie. hiking, horseback riding, and biking) as defined by the nationwide trails study (Trails for America, 1966) and sections of subsequent legislation (P.L. 90-543). Additional impacts which were not discussed or only touched on briefly include: initial impacts on land values, land speculation etc. resulting from trail proposal refinement to corridor specific status, potential secondary impacts of induced development (eg. second homes, food vendors, gas stations, motels etc.), ability (and effectiveness) of loosely organized groups to maintain the trails, and ability of existing personnel in state parks and national parks and forests to operate and maintain additional territory. Much of the burden of realization of this system rests with the eight States. However, little information or discussion is in evidence in this Draft outlining the impacts on States from a financial, program and management standpoint. For example, the Land and Water Conservation Fund is offered as a source of funding for implementation of the trail outside of existing public owned property. This brings the issue of the

fifty percent matching share to light. If it is determined that this trail system should be ready for use in ten years, what impacts would result on the States' abilities to seek and obtain the necessary Federal monies and the necessary State matching funds? In addition, how would such seeming prioritization effect other State acquisition and development plans? The States, through the appropriate recreation/land management agency, will ultimately be responsible for development, operation, and maintenance of most of the trail area (re: Table IV, page 68). What potential exists for impacts of such responsibility on the individual States once again from a financial, program and management standpoint?

In summary, it should be noted that several impacts of some magnitude are considered to merit further discussion. All of the issues and questions are of a general nature and therefore applicable to all of the States involved. Cognizance of the impacts outlined will do much toward compliance with the requirements and intent of the National Environmental Policy Act. However, the in-depth analysis and display of specific impacts must take place on a State by State basis. It is suggested that the Final Statement outline more specifically the intent, circumstances and process whereby individual Environmental Impact Statements might be prepared.

We appreciate the opportunity to review and comment on this Draft and look forward to reception of the Final Statement.

Very truly yours,



Ira L. Whitman
Director

ILW/mar
81100.0

cc: W. B. Nye, Director, Ohio Department of Natural Resources
State Clearinghouse

Letter dated October 29, 1974, from the Ohio Environmental Protection Agency

1 and 2. Specific impacts cannot be determined at the corridor stage. When the selected right-of-way is published in the Federal Register, there will be an opportunity for public review. See additional discussion added to Section I.3. Compliance with NEPA. Additional discussion on snowmobile use has been added. See response to comment No. 2, Ohio Department of Natural Resources.

3. Additional discussion of secondary impacts has been added to Section III. Impact on Land Use.

4. Trail segments on nonfederal land would be established at the option of the State or local government. If funds are not available for trail development and maintenance, the project probably would not be undertaken. If it were, Land and Water Conservation Fund monies would be available to the States. The availability of Land and Water Conservation Fund monies is not meant to indicate that the North Country Trail has a priority for the use of these funds.



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF THE GOVERNOR
HARRISBURG

MILTON J. SHAPP
GOVERNOR

November 6, 1974

The Honorable Rogers C. B. Morton
Secretary of the Interior
Washington, D.C. 20240

Dear Secretary Morton:

This is in reply to your letter of September 17, 1974, in which you requested that we review the Bureau of Outdoor Recreation's proposed report on the North Country Trail and the accompanying draft environmental statement.

We have carefully reviewed both documents and find them to be concise and well written. We can offer no comment or criticism which could add to their content.

The Commonwealth of Pennsylvania feels that it is both feasible and desirable to establish and develop the North Country Trail as a National Scenic Trail. Because of the time factor involved (the need to develop such a trail as quickly as possible), we feel that Federal Administration is the most desirable administrative alternative. On state-owned lands cooperative agreements between the concerned nonfederal agency and the administering Secretary could provide for the protection and management of the trail corridor.

We appreciate having an opportunity to comment on these reports and shall be looking forward to the establishment of the North Country Trail.

Sincerely,


MILTON J. SHAPP
Governor

Letter dated November 6, 1974, from Milton J. Shapp, Governor of Pennsylvania

No response necessary.



STATE OF VERMONT
OFFICE OF THE GOVERNOR
MONTPELIER, VERMONT 05602

AREA CODE 802-828-3328
October 17, 1974

Mr. Frederick J. Bender
Acting Regional Director
U.S. Department of the Interior
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Bender:

As the state clearinghouse designated by the Governor in accordance with U.S. Office of Management and Budget Circular A-95 we have circulated copies of the draft environmental statement on the North Country Trail to the following:

- Agency of Development and Community Affairs
- *Agency of Environmental Conservation
- *Vermont Department of Highways
- Scenery Preservation Council
- *Addison County Regional Planning and Development Commission
- Ottawaquechee Regional Planning and Development Commission
- *Two Rivers Regional Planning and Development Commission

Those entities which have submitted comments are marked with an asterisk(*). Those comments are attached and should be included with this letter as part of your final environmental impact statement.

Let me summarize the major points raised by these agencies. Together they indicate Vermont's position on this project, which as you realize has always been generally in conflict with the views of other states involved in the trail corridor as proposed.

1. Vermont is not in favor of another major trail in the state. Existing trails are privately maintained, if at all, and major sections of the Appalachian Trail are unprotected. These existing trails receive heavy use already, and their maintenance deserves priority over development of new facilities. 1
2. There are a number of inadequacies in the assessment of impacts included in the statement. These are detailed in the various agency comments; they generally indicate that the potential adverse effects have been glossed over in the report. 2

Mr. Frederick J. Bender
October 17, 1974
Page Two

3. The implication seems to be that the State of Vermont's position will be softpedalled in the process by which a decision is made on this trail. We feel this is contrary to the intent and language of P.L. 90-543.

3

We would ask that the individual commentaries attached be carefully examined and responded to specifically in the final impact statement. Please provide this office with ten(10) copies of the final statement for distribution.

Sincerely,



Arthur Ristau

AR:en

Encl.

cc: Governor Thomas P. Salmon
Senator George D. Aiken

Letter dated October 17, 1974, from Arthur Risteau, State Planning Office, Office of the Governor of Vermont

As the official State clearinghouse, the State Planning Office coordinated the review of the draft statement by State and local governmental agencies. The comments of each will be responded to separately.

The State Planning Office has summarized the major points raised by these agencies.

1. Both the Secretary's report and the final EIS have been revised to indicate that Vermont is not in favor of another major trail in the State.
2. We disagree that potential adverse impacts were glossed over.
3. Neither the report nor the draft EIS were meant to imply a "soft-peddalling" of Vermont's position. We regret that this was inferred. Vermont's position on the North Country Trail was submitted to the Secretary of the Interior during the official review period of the Secretary's proposed report. This was the proper time for each State's official view to be stated. The report and the EIS have been revised accordingly.



State of Vermont

AGENCY OF ENVIRONMENTAL CONSERVATION

MARTIN L. JOHNSON, Secretary

Montpelier, Vermont 05602

OFFICE OF THE SECRETARY

October 15, 1974

- Department of Fish and Game
Department of Forests and Parks
Department of Water Resources
Environmental Board
Division of Environmental Protection
Division of Recreation
Division of Planning
Natural Resources Conservation Council

TO: Judy Walke, State Planning Office
FROM: Edward J. Koenemann, Director, Division of Planning
RE: Draft Environmental Impact Statement, U.S. Department of the Interior North Country Trail

The Agency has reviewed the North Country Trail proposal and environmental impact statement. We wish to make the following comments:

The proposal does not meet the criteria and mandates stated in Public Law 90-543. The Vermont state position on the North Country Trail Subcommittee has been ignored in the report. Public Law 90-543 makes considerable reference to the requirement of "consent by the state" prior to any corridor or route selection.

The Vermont state official position indicates that the North Country Trail should terminate in Crown Point, New York and should not connect with the Appalachian Trail any place in Vermont. Not only is that an official state position, but is also the position of the Board of Directors of the Green Mountain Club, who have responsibility for the Long Trail, which runs north and south along the ridge of the Green Mountains.

Close examination should be made of the North Country Trail proposal to eliminate some of the apparent inconsistencies. The user standards cited for 20 people per mile per day, are inconsistent with the standards quoted from the Vermont State Comprehensive Outdoor Recreation Plan. The wilderness type hike experience should disperse people so that there is a density of one person per mile. Twenty persons per mile in our standards are for short walks and urbanized trails within state parks.

There is a statement in the proposal which indicates that areas which would be subject to damage from trail users should be avoided. This statement should apply to the high intensity travel over fragile upper elevations of the Green Mountains. No matter where the North Country Trail crosses it will produce an adverse impact upon the Long Trail which we have documented to BOR in the Philadelphia Office is already loaded more than the natural resource can stand.

The grade recommendations in the proposal are not pertinent to an east-west crossing of the Green Mountains because of the steep terrain. We can anticipate that in spots the 15% would be exceeded. It also states that Vermont is in the process of obtaining their blanket recreation liability laws. This is incorrect.

Title 13, V.S.A. Section 3705, which is Vermont's Trespass Law, was amended. The landowner does not have actual liability unless he charges admission or fee for the specific use or unless negligence can be proven. However, this applies only in a limited way.

Vermont is already very much on record favoring the Federal administration of the unprotected section of the Appalachian Trail, which is the most predominant trail for our area at this time. Because of the limited resources of Vermont, it would be impossible for us to protect and secure this section of the trail. If the North Country Trail proposal is adopted by congress as presented in the report, Vermont would favor federal administration (and funding) of that route as well.

We do not think that the impact on soils section on page 72 is satisfactory. It states that the soil compaction is expected to be local and of minor significance. We believe very strongly that the real problem in the upper elevations is with soil compaction. It would appear that the proposed route in Vermont, however short, encompasses a higher proportion of unstable fragile soils than in other states.

On page 78 there is a discussion of impact on highways which we believe to be unsatisfactory. The hiker/car conflicts where the trail crosses particularly those 19 interstates are only lightly addressed and the cost of providing underpasses for pedestrians as recommended does not appear to be calculated. No mention is made of any parking facilities for the hikers who come some distance to take advantage of this trail. The Environmental Impact Statement, on page 79, discusses inadequately the potential of vandalism. With increased trail access there will be a greater potential for this kind of damage. The narrative makes no mention of the existing capacity for hiker supervision and enforcement in the affected states nor the demands for enforcement and surveillance created by the North Country Trail.

On page 83 of the EIS, there is a statement which says those states with the low priority interest in hiking trails probably will not provide such facilities. This is an unfair statement in two respects. It may be that a state may not be able to provide such facilities because of limited financial resources rather than because it is low priority and even if it is a low priority, it seems to us there is nothing wrong with his line of reasoning. The states are responsible for doing their own comprehensive outdoor recreation planning as established by the Land and Water Conservation Fund. It seems that at this point the BOR may be trying to influence the states to accept the concept of a North Country Trail.

Also on page 83, Finding #3, which deals with alternatives seems to be inconsistent with the trail proposal. Congressional directives can be amended and if a shorter trail were desirable such an alternative would be viable.

In summary, the establishment of a North Country Trail corridor in Vermont has a very low priority in light of the other recreation needs. It is hard to find tangible benefits to the State from the proposal but it is possible to envision some financial and environmental disadvantages. The proposal has been written in direct contradiction to Vermont's official opinion and as stated on page 2 of the draft EIS, the opinion of the subcommittees which were established in each State and were responsible for selecting corridors within their states. The Vermont corridor shown on the map on page 23 of the draft does not reflect the route which Vermont's committee recommended. A public hearing in Bennington demonstrated that there is neither public or user or administrative support for the North Country Trail. It is the position of this Agency that until the Long and the Appalachian Trails are protected, Vermont is not interested in expending efforts and money on any other trail in Vermont.

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Memorandum dated October 15, 1974, from the Vermont Agency of Environmental Conservation

1. The reason for an official review of the proposed Secretary of the Interior's report on the North Country Trail is to obtain official comment. Since the report and the environmental impact statement were reviewed concurrently, the position of the State of Vermont could not be reflected in the draft environmental impact statement. It has been incorporated into the final. The reference to the North Country Trail contained in the 1973 Vermont State Comprehensive Outdoor Recreation Plan has been incorporated into the final EIS in Section I.M. Inter-relationship with Other Plans and Projects.
2. The user standards are based on standards taken from several SCORP's. They provide a general estimate of use at design capacity. It is reasonable that some areas will have different carrying capacities related to both physical properties of the trail and management decisions on the type of trail experience being provided. Please note the revision in the capacity figures for walking for pleasure.
3. Any crossing of the Green Mountains would take into consideration the topography, soil, vegetative types, and other environmental factors pertinent to local conditions. Reference to the potential overuse to areas made accessible by the North Country Trail has been added to the final EIS in Section III.L. Impact of Visitor Use. See also Section III.M. Impacts of Use on Other Trails.
4. The reference to Vermont's trespass law has been deleted from the report.
5. Because of the corridor concept level of the proposal, impacts have, of necessity, been discussed in general terms. We agree that fragile, alpine areas should be avoided. One reason for a 10-mile wide corridor was to permit tread location in the most environmentally advantageous areas.
6. The discussion of highway crossings is based on the assumption that trail tread location will be able to utilize existing low traffic overpasses. While the possibility of having to construct pedestrian crossings was acknowledged, cost figures cannot be estimated at this time.
7. Mention of parking facilities has been added to Section III.A. Impact on Vegetation, in the final EIS. The potential for vandalism has been acknowledged. (See letter from Ohio, page 196.) A discussion of law enforcement has been added to Section III. L. Impact Related to Visitor Use.
8. The statement on page 83 referred to by Vermont is not meant to criticize a State's priorities or planning program. It was meant to acknowledge that some States may have financial limitations relative to trails.

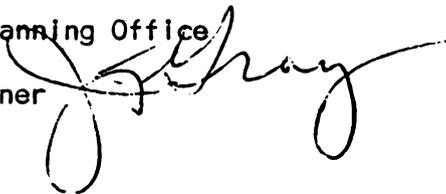
9. See response to the Bureau of Land Management comment No. 3 concerning this alternative.

10. The corridor location in Vermont was selected because, being longer, it afforded more recreational opportunities to the people of Vermont than did the shorter route. The route through the Green Mountains was suggested to the Federal-State task force by the Vermont representative at the last study team meeting. The utilization of this route was a Bureau decision, not a task force one (see response to the U. S. Forest Service comment No. 4). The results of the public hearing in Vermont were presented in Section IX, Consultation and Coordination with Others, of the draft EIS.



STATE OF VERMONT
 DEPARTMENT OF HIGHWAYS
 MONTPELIER
 05602

MEMORANDUM

TO: Judy W. Walke, State Planning Office
 FROM: John T. Gray, Commissioner 
 DATE: September 20, 1974
 SUBJECT: Draft EIS - U.S. Department of the Interior, North Country Trail

The following are our comments, after review of the above Draft EIS:

- 1) Not enough factual information is provided to assess the impact. | 1
- 2) Specific trail corridors are not detailed to recognize impacts. |
- 3) Map coverage is insufficient and difficult to read. Larger scale maps of the corridor are needed to attempt to recognize soils, tree cover and physiographic detail. |
- 4) Typical cross-sections, depicting trails for hiking, riding, snowmobiling, etc. would be helpful. | 2
- 5) The Draft EIS doesn't indicate alternates in sufficient detail to recognize why the selected corridor is justified. | 3
- 6) Will the usage of the trail in the year 2000 be detrimental to the local ecology? | 4
- 7) Will the trails be utilized by motorized vehicles? Has a noise evaluation been made? | 5
- 8) It is our opinion that the entire statement is extremely generalized, without sufficient supporting data. | 6

Memorandum dated September 20, 1974, from the Vermont Department of Highways

1. The corridor concept necessitates a general discussion of impacts. Specific impacts will be discussed during route selection.
2. While standards for trail construction are presented as guidelines, the administrator of a trail segment would not necessarily follow these exact standards. To graphically illustrate different trail cross-sections would be premature. However, this suggestion might be incorporated into environmental impact statements prepared at the route selection stage.
3. The reasons for recommending the corridor as discussed in the report have been clarified on page 5 of the final EIS.
4. With proper management, the trail should not adversely impact the local ecology in the year 2000.
5. With the exception of some segments designated "recreational" to allow snowmobile use, the trail would be closed to motor vehicles. The expected use of the trail was discussed in Section III.G. Impact on Recreation (page 74). A noise evaluation is not practical until it has been determined what trail segments would be open to snowmobiles.
6. See response to No. 1.



ADDISON COUNTY

REGIONAL PLANNING & DEVELOPMENT COMMISSION

MIDDLEBURY, VERMONT 05753

TELEPHONE: (802) 388-4864

September 30, 1974

Ms. Judy Walke
State Planning Office
5th Floor Pavilion Building
Montpelier, Vermont 05602

Dear Judy:

Subject: Draft Environmental Impact Statement U.S. Department of the
Interior North Country Trail

May I take this opportunity to express a total anti trail establishment feeling from this office.

Vermont has long been a state of natural beauty protected over past centuries by Vermonters who had a love for the land and all of its assets.

Vermont at one time was a sovereign state with a desire for individuality and independence.

Vermonters were, in the not too distant past, brought to the realization that others had an eye on the things we in Vermont cherished and were making plans to acquire parts of it and even the United States Government took an active part in establishing the Green Mountain National Forest; in essence it was willing to take back for minimal fees that which was granted earlier. Whether the government ownership of a quarter of a million acres in Vermont which returns 25% of its "take" to the communities in which it lies is highly debatable.

Next we went through the proposal for a "Scenic Highway" to run the length of the State along its uppermost reaches similar to the one in Virginia. This was soundly defeated.

Next a senator from the Dakotas proposed a Northeastern National Park in the New England area with, I believe, the proviso that all lands within the boundaries of said park be acquired through any legal means to "freeze" out persons owning land within the proposed area.

The Long and Appalachian Trails were established and are, at present, more than can be properly taken care of.

I was privileged to chair an Advisory Committee to the Interagency Committee on matters of planning, development, maintenance and coordination of a net-

work of trail systems throughout Vermont serving equestrians, bicyclers, snowmobilers, cross country skiers, hikers, cyclests etc. During the Committees deliberations and final recommendations I quote a statement in part of Mr. Gardner Lane, Green Mountain Club of Vermont, "The Green Mountain Club does not recommend the establishment of any more hiking trails. There being some 260 miles of Long Trail plus side trails that they maintain". Places along the Long Trail are now in need of detour areas to avoid further erosion due to the fragile area it passes over. We deplore the continued infringement on Vermont's fragile areas by masses of people.

Vermont's uniqueness lies in its unspoiled beauty. It is without question a land area that must be protected at all costs from continued exploitation by those that propose to be all things to all people. Without this protection Vermont can become a biological desert of little use to future generations.

We have been forced to accept "interstate" highway systems with no apparant end in sight; we can now proceed to Vermont by boat from the Great Lakes region; and the proposal to bring the other segment to Vermont on foot may seem a little facetious, but never the less a reality.

We endorse the stand that "no more considerations be given the proposal".

Sincerely yours,



R.A. Willis
Executive Director

RAW/pkc

Letter dated September 30, 1974, from the Addison County Regional
Planning and Development Commission (Vermont)

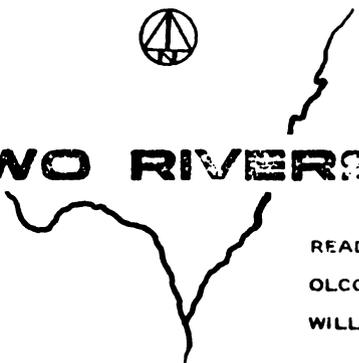
(This letter is a position statement, not a review of the environmental
impact statement.)

No response necessary.

RANDOLPH ● PITTSFIELD ● NEWBURY ● HANCOCK ● GRANVILLE ● FAIRLEE ● CORINTH ● CHELSEA ● BROOKFIELD ● BRAINTREE ● BRADFORD ● BETHEL ● POMFRET



TWO RIVERS REGIONAL PLANNING AND DEVELOPMENT COMMISSION



SHARON, VERMONT 05065

READ PERKINS ● CHAIRMAN
OLCOTT HOOPER ● VICE CHAIRMAN
WILLIS STODDARD ● TREASURER

September 27, 1974

Ms. Judy Walke
State Planning Office
Montpelier, Vermont 05602

Dear Ms. Walke:

In response to your request for regional commission review of the North Country Trail proposal; the matter was discussed at the Regional Meeting of the Two Rivers Regional Planning Commission held September 25, 1974. I am enclosing a copy of the relevant portion of the minutes of this meeting for your information.

There was no formal resolution passed concerning this matter, but the opinion expressed by everyone who spoke was that such a project is not a high priority in the Two Rivers Region. Commissioners stated that since Vermont already has the Appalachian Trail and the Long Trail, such a proposal is a duplication and more effort should go towards maintenance of existing trails or creation of short hiking trails within the municipalities. Other objections included the multi-use nature of the trail, the expense involved and the 200 ft. right-of-way which was felt to be excessive.

In summary, the Commission felt that such a project should not take high priority in the Two Rivers Region at this time.

Sincerely,

Polly Nichol
Two Rivers Staff

PN/jj
Enclosure

"Commissioners were then asked for their opinion on the proposed "North Country Trail" which the commission is required to review under the federal A-95 review process.

The general opinion expressed was that this is not a high priority in this region. Commissioners stated that since Vermont already has the Appalachian Trail and the Long Trail this proposal is a duplication. The opinion was also expressed that the revenue could be better directed towards other recreation projects and that the 200 ft. proposed right-of-way was excessive. Several people thought that creation of more trails such as nature hiking trails within individual towns was desirable."

Excerpts from the Two Rivers Regional Meeting, September 25, 1974

Letter of September 27, 1974, from the Two Rivers Regional Planning
and Development Commission (Vermont)

(This is a position statement, not a review of the environmental impact
statement.)

No response necessary.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

L. P. Voigt
Secretary

October 22, 1974

BOX 450
MADISON, WISCONSIN 53701

IN REPLY REFER TO: 1600

Mr. John D. Cherry, Regional Director
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

Re: D 3819 NCT

The Department of Natural Resources has completed an interdisciplinary review of the draft environmental impact statement for the proposed North Country Trail (DES 74-84) and has the following comments to offer. Our review will include general comments and specific comments keyed to the page, paragraph and sentence in the draft environmental impact statement.

General Comments

It is noted that states would be able to apply for grants from the Land and Water Conservation (LAWCON) fund for the acquisition and development of the trail right-of-way. Use of LAWCON funds for acquisition or development of any part of the trail indicates a potential Section 6F involvement for the entire trail according to current federal interpretations. As a result, a series of potential conflicts appears possible.

For instance, a logical argument could be made that since LAWCON funds were used to purchase one mile of trail in one state, Section 6F would apply to the remaining 3,245 miles of trail even though the other seven states used a different source of funds. Currently unresolved problems encountered with Section 6F points out that future administration of the trail could be jeopardized without even considering the implications of non-federal land controlled by easements and agreements.

While it may be possible to minimize potential 6F involvements by a judicious and fully coordinated effort at locating the trail, it will not, in our opinion, be possible to entirely avoid future conflicts. It is, therefore, suggested that the Bureau of Outdoor Recreation fully explore the ramifications and implications of Section 6F. Consideration should be given to means of streamlining the administrative procedure including the possible delegation of authority for Section 6F to the State Liaison Officer. Detailed guidelines

for the administration of Section 6F, legal interpretations, and a full range of potential 6F involvements should be included. Additional emphasis on Section 6F is necessary to provide further guidance and clarification to the states which must administer it at the local level by working with the highway departments, public utilities and private individuals.

1

The corridor map indicates that the proposed trail would enter the Brule River State Forest at a point approximately one mile north of CTH "FF" and would travel up along the Brule River to the area of the Brule-St. Croix Portage where it would leave the forest. If the trail would be placed on the east side of the river, we anticipate a number of potential problems. For instance, it would then become necessary to cross the river. We feel that an existing bridge should be used since any additional crossings would be aesthetically undesirable. It would also be difficult to satisfactorily locate the trail between the river and CTH "H" on the east side. A trail in the Brule River State Forest should be maintained well away from the river since there is already heavy fishermen traffic on the immediate banks. The actual trail tread should be kept a minimum of one-half mile from the river.

2

A snowmobile trail which runs from the Brule-St. Croix Portage northward for some distance is already in existence. This snowmobile trail should be incorporated into the trail plan since it could be easily improved for hiking eliminating the requirement of another 26-mile swath through the forest.

The draft environmental impact statement recommends that camping facilities be located at eight-mile intervals. This would require the construction of three or four primitive camp sites in the Brule River State Forest. Provided that the trail would be located far enough away from the river, properly conducted construction activities should not cause significant erosion and siltation of the Brule River.

Specific Comments

Page 6, paragraph 2 - An explanation should be provided on the various recommendations for acquisition. Without more information it would seem most reasonable to use any of the three methods necessary to acquire the right-of-way. Also the differences between an easement and an agreement should be clarified.

3

Page 8, paragraph 3 -- We suggest that a tread width of 12 feet be considered for two-way snowmobile traffic instead of 15 feet.

4

Page 9, paragraph 4 - We suggest that the following sentences be added at the end of this paragraph: "Township and municipal parks as well as private enterprises may provide facilities compatible with the trail's purpose. Grocery stores, private campgrounds and resorts all provide facilities and services that may benefit trail users."

5

Page 9, paragraph 5 - It would appear possible that additional lands may have to be acquired in addition to the recommended 25 acres/mile in order to provide rustic camp sites, rest areas and parking facilities.

6

Page 10, item H - Additional consideration should be given to Federal administration of the proposed trail for the following reasons.

1. Maintenance and enforcement standards may vary considerably from state to state as well as within any one state.
2. Federal administration would eliminate the question of who would acquire lands, easements and agreements outside of existing publicly-owned project boundaries.
3. Private groups could not receive LAWCON or ORAP (State) funds for acquisition and development of the trail.
4. The 6F procedure would not be quite as cumbersome since one step in the process would be eliminated, and applicants would deal directly with the most responsible agency.

7

Page 16, item L, paragraph 1 - Ski touring and snowshoeing would be compatible uses. They would obviously not be compatible with snowmobiling for safety reasons. We would expect that if snowmobiling were allowed most other winter recreational uses of the trail would be greatly reduced or eliminated.

8

Page 18, paragraph 3 - Since the North Country Trail could traverse state or federal wilderness areas, the proposal could result in significant adverse environmental impacts to these scarce resources. To minimize deterioration by numerous trail users, it is recommended that designated and potential wilderness areas be specifically avoided by the main trail. If primitive access to wilderness areas was deemed necessary and desirable, it could be provided by the spur or secondary trails.

9

Page 19, paragraph 1, last sentence - We suggest that the word "remote" be eliminated since today's technology makes very few places really far away.

10

Page 44, paragraph 1, last sentence - Yellow and paper birch are two distinct species.

11

Page 50, paragraph 2, line 2 - The correct spelling is "Winnebougou."

12

Page 50, paragraph 4 - Moose are rare visitors. Pheasants are not present along the Upper St. Croix River.

13

Page 63, paragraph 4 - Only the eastern lobe of Lake Sakakawea is called "Lake Audubon."

14

Page 72, item III - The experiences gained on the environmental impacts of heavily used hiking trails, such as the Appalachian Trail, could be included in this section. The heavily used portions of a trail show signs of erosion, soil compaction, littering and mutilation or destruction of vegetation. Where trails and overnight facilities have road access, camping facilities are nearly unavailable to hikers because of transient use. Also, overuse and crowding could become a problem.

15

Page 72, item C - Motorists would generate exhaust emissions and noise travelling to the trail and at the parking lots associated with the trail.

16

Page 73, item D - The trail corridor would also provide some "edge" which would be beneficial to wildlife.

It is not clear whether the entire trail would be open to hunting. Easements or agreements could prohibit hunting on certain areas. It would probably be necessary to prohibit hunting near urban areas and special use areas such as campgrounds, parking lots and scientific areas. In Wisconsin, it is unlawful to hunt on state-owned park facilities; however, rifle and bow and arrow deer hunting can be allowed upon proper modifications of the Administrative Code.

17

Page 75, item H - The potential impacts of fencing, service roads crossing the trail and emergency turnarounds and access for fire control, enforcement and emergency vehicles should be considered.

18

Page 75, paragraph 5 - There could be potential conflicts between hunters and hikers where the trail would pass through established hunting areas such as the Douglas County Grouse Area.

19

Page 79, sentence 4 - It is not clear whether motorized service vehicles could be used for trail construction and maintenance.

20

Page 80, paragraph 1 - Gates and cables should be well marked to prevent accidents and liability. The Department of Natural Resources has specific standards for marking cables and gates.

21

Page 83, item 1 - In addition to the advantages and disadvantages discussed, consideration should be given to the effect of national trail status compared to state trail status. After a state acquired and developed the trail and it was designated as a national trail, recreational use could increase to a point where the state could not effectively manage the area. Thus, some states may not be able to solve the increasing rate of resource deterioration due to increased recreational use, particularly if they had no authority to regulate the number of trail users.

22

In summary, we feel that the preparation of this environmental impact statement at the corridor selection stage is a commendable effort which allows an environmental analysis of the proposal at the earliest possible stage. Continued coordination with our Department through all stages of implementing the project will help to assure the most enjoyable and environmentally compatible project possible. A critical stage will be the eventual selection of the right-of-way. During this process our Environmental Impact Coordinator at Spooner should be consulted since he is very familiar with right-of-way selection procedures through involvements with numerous highway and power line projects.

We thank you for the opportunity to comment on this draft environmental impact statement, and we look forward to continued close liaison in implementing the proposal. If we can be of assistance to you, please feel free to contact us.

Very truly yours,
Bureau of Environmental Impact


C. D. Besadny
Director

cc: Honorable Patrick J. Lucey - C A P I T O L
L. P. Voigt

Letter dated October 22, 1974, from the Wisconsin Department of Natural Resources

General Comments

1. We have recognized the potential for conflicts with Section 6(f) of the Land and Water Conservation Fund Act (LWCF). However, we do not agree that 6(f) would apply to the entire trail if one portion of the trail were acquired or developed with LWCF monies. When an individual project is submitted for LWCF approval, it can be written in a specific manner in order to avoid attaching 6(f) implications to the remainder of the trail. The State of Wisconsin has no control over portions of the trail owned and controlled by other States or political subdivisions unless a joint management agreement pertains.

The Bureau of Outdoor Recreation is aware of the ramifications of Section 6(f). The modifications which Wisconsin is suggesting would require legislative action in the form of amendments to the LWCF Act.

2. The specific route location suggestions would be a matter of consideration during the route selection stage.

Specific Comments

3. Any of the three land control methods could be used to secure the right-of-way for the trail. The various amounts indicated for fee title, easements, and agreements are averages only and are used for estimating costs. For purposes of the report, the term "easement" means a less-than-fee title purchase of land rights, and an agreement indicates either a formal or informal arrangement between landowner and administrator to use property. Donation or property exchange may also be used.

4. A tread width of 12 feet has been accepted. (See standards, page 7.)

5. Suggestion has been added.

6. Additional acquisition is the prerogative of the administering agency. For purposes of this study, the average of 25 acres per mile is considered adequate. As conditions allow, this may mean less than 25 acres in some areas and more than 25 acres in others.

7. Wisconsin's reasons for Federal administration are noted, and by inclusion in this document are made a part of the public record and available to Congress and the Secretary of the Interior.

8. Conflict between snowmobiling and other winter uses was acknowledged. We have added more specific information (see page 94).

9. Generally, hiking trails are considered to be compatible with wilderness areas. As discussed in Section I, B. Trail Alignment (page 4-5), provision has been made to avoid fragile areas. However, this is a concern to be expressed during the route selection stage.

10. Remote is a relative term. Because of the language in the National Trails System Act which recommend trails "in scenic areas more remotely located," we prefer to let the adjective remain.
11. Correction noted.
12. Correction noted.
13. Correction noted.
14. Correction noted.
15. See new Section III.M. Impacts of Use on Other Trails.
16. Mention of automobile exhaust has been added. Reference to parking lots has been added to A, B, and C of the Impact section. Long distance hikers and bicyclists would be on the trail rather than using a motor vehicle for long distance pleasure trips. Backpackers may also use a bus or other mass transportation system to circumvent the problem of returning to a car which may be many miles away at the end of the hike. We believe these practices will help mitigate possible adverse impacts arising from transportation vehicles and reduce the need for parking lots.
17. The creation of "edge" has been added to the final EIS in Section D. Impact on Fish and Wildlife, page 92. Whether or not hunting will be allowed will be a management decision and cannot be determined at this time. Hunting may pose a safety problem and in some places such as game preserves, national parks, etc., would be inconsistent with management policy, thus would not be allowed by the administering agency.
18. A general reference to the need for servicing of trail segments has been added to the final EIS in Section III. Impacts Related to Visitor Use. During selection of a route, detailed impacts will be assessed.
19. The potential for conflicts should be considered at the route selection stage. If the trail is routed through established hunting areas, it will be a management decision as to how to minimize conflicts. Reference to potential conflicts has been added to page 94.
20. Whether motorized service vehicles could be used on the proposed trail would depend on local conditions and management policies. The construction and maintenance of a foot trail on a hilly, rocky area is vastly different from constructing a trail on an eight-foot wide abandoned railroad. Where the trail passes through an established wilderness area, service vehicles could not be used. Elsewhere motorized service vehicles could be used if conditions warrant and they were permitted by management agency regulations.
21. Suggestion has been added to the suggested standard for control devices.

22. The impact section is based on an assumed adequate level of management. If for financial reasons such management is not adequate, deterioration of the trail becomes a possibility. However, while national status may increase use, it should also increase support of trail programs, both financially and from private organizations such as hiking clubs which may voluntarily care for a trail segment. If a unit of government believes itself financially incapable of properly maintaining a trail segment, that segment will probably not be constructed.



American Motorcycle Association

P.O. Box 141, Westerville, Ohio 43081
December 9, 1974

Telephone 614/ 891-2425
Telex: 245 392

Mr. John Cherry
Regional Director
Lake Central Regional Office
Bureau of Outdoor Recreation
Department of the Interior
Ann Arbor, Michigan

Dear Mr. Cherry:

We would like to offer the following comments concerning the Draft Environmental Statement for the proposed North Country Trail;

1. Location and Description of Proposed Action. The trail is to be located within and along a ten mile corridor to be identified in the future. As the Draft Environmental Statement ("the Statement") recognizes, it will then be possible to designate some sections of the trail as scenic and recognize others as recreational. The Statement admits recreational segments could generally be located near urban areas and in some instances the use of snowmobiles could be allowed. The "background" section quotes the 1966 report Trails for America which recommended the establishment of a national system of trails for those who wish to "walk, hike, ride horseback, and bicycle." We feel that Trails for America is not sufficient background for the Statement. We call your attention to Outdoor Recreation - A Legacy for America published by the Bureau of Outdoor Recreation in November of 1973. In that statement of the Nationwide Outdoor Recreation Plan it is admitted that "federal land managing agencies will intensify their efforts to establish national recreation trails and other trails on lands which they administer. " According to this more recent plan such trails "may be of any length and designed for either single or multiple purpose use, including motorized vehicles." (emphasis ours) Also in the Nationwide Outdoor Recreation Plan it is pointed out that "recreation yields three basic types of benefits: 1. direct satisfaction to the individual; 2. enhancement of the overall mental and physical quality of the individual and investment in human capital adding to the productivity of the individual in society; 3. important third party benefits such as increased business and property value."

From an examination of Table II-4 found on page 23 of Outdoor Recreation - A Legacy for America, riding motorcycles off-the-road ranks 17th among activities in per cent of participation. It goes without saying that riding motorcycles off-the-road is outdoor recreation. It necessarily follows that it also yields the three basic type benefits. However, as pointed out in Table IV-14 on page 84 of Outdoor Recreation - A Legacy for America, the per capita supply of off-road vehicle trails when compared to the national average is substantially lower than that average in the northeast and north central portions of the United States, which will be traversed by the North Country Trail.

2. Criteria for National Scenic Trail Designation. According to the Statement, the North Country Trail should be designed for "hiking and other compatible non-motorized uses in a manner that would protect the natural qualities of the trail's environment." We would point out that compatibility is a two-way street. While motorcycling off-the-road may not be always compatible with hiking, conversely and just as valid is that hiking may not be compatible with off-road motorcycling. If the North Country Trail can be designed for hiking in a manner that would protect the natural qualities of the trail's environment we would think it would necessarily and logically follow that sections of that trail itself could also be designed for off-road motorcycling in a manner that would protect the natural qualities of the trail's environment.

3. Compliance with the National Environmental Policy Act. The Statement admits that specific impacts of a trail route cannot be determined until the administrating agency locates an actual route within the corridor. However, the Statement has ignored the effects of this admission and excluded motorcycles pre-emptorally without having made an actual determination of the routes within the corridor. It begs the question to assume that in a 10 mile corridor along a 3,246 mile route through eight states, there are no suitable trail sites that could be utilized for off-road motorcycling.

3. B - Trail Alignment. In this section of the Statement abandoned railroad right-of-ways are recognized as easily convertible to trails, which that Statement says is true "especially for bicycles and snowmobiles." We would point out that abandoned railroad right-of-ways make excellent off-road motorcycle trails. Table I of this section lists 357 miles of existing trail as intended for inclusion in the North Country Trail. The Statement fails to specify what are

the present uses of these existing 357 miles of trail and also omits to provide any alternatives when their use in the North Country Trail would deprive their present users of the opportunity to use them for outdoor recreation. 3

3. C - Right-of-Way Land Acquisition. 542 miles of the trail is to be located in the exterior boundaries of federally administered areas. The same comment made above about the failure of the Statement to set forth what current use is being made of those miles of trail is apt here. 4

3. D - General Standards for Trail Construction. Again compatibility is a two-way street. We fail to understand, and the Statement does not explain why, even with the half-hearted view of compatibility, snowmobiling "may be permitted where compatible" while motorcycling is totally ignored. The general standards set forth in this section are generally applicable to off-road motorcycle trails and no additional standards nor expense would be necessary if motorcycle trails were included. 5

3. E - Trail Facilities. It is interesting to note that the Statement provides for the sharing of the trail by hikers and horsemen and admits the necessity where such use will occur to construct appropriate facilities such as feeding and water places or corrals. The Statement fails to set forth the number of horses which are available for use on the North Country Trail yet assumes and encourages construction at extra expense for special facilities for such use. The Statement has also failed to specify the number of off-road motorcycles available for use and the number of off-road motorcyclists which would be potential users of the North Country Trail. We would point out that Table II-4 contained on page 23 of Outdoor Recreation - A Legacy for America, indicates that 51.5 millions of activity days occurred during the summer of 1972 for horseback riding while 58.2 millions of activity days were spent riding motorcycles off-the-road. Thus, it seems contradictory to provide, especially at additional expense and inconvenience, facilities for use such as horseback riding which admittedly by BOR statistics ranks lower in popularity than riding motorcycles off-the-road. 6

3. F - Maintenance. The Statement admits that bicycles require certain traveling area and tread improvement beyond that necessary for hiking and that also snowmobiles would require special assistance and attention, such as explained in the previous section for horses.

Therefore, given these admissions, it seems to have little validity to attempt to justify the omission of off-road motorcycling from the North Country Trail because of the possibility of requiring special trail treatment.

3. I - Trail Costs. We would point out that those persons who made up the 58.2 millions of activity days the summer of 1972 riding motorcycles, were tax payers and their family members. Certain percentages of the taxes paid by those motorcyclists are necessarily included within the \$6,000. per mile estimated for the construction of trails in the North Country Trail where no trail exists at the present, and \$1,200. per mile for improvement of existing trail. The Statement fails to indicate any alternative expenditures on behalf of these tax payers, though they are admittedly assisting in the proposed construction and improvement of trails for other types of users.

Of course, the same comments are applicable to the monies intended to be expended for maintenance and administration.

3. L - Satisfying Recreation Needs. The Statement does not define "recreations of a non-consumptive nature." We would point out that every form of outdoor recreation is consumptive in one sense or another. In failing to admit this the Statement is open to the obvious conclusion and criticism that it is wholly inadequate in assessing, even in draft form, the potential environmental effects of the North Country Trail, even in its proposed limited posture.

This section provides an example of the Statements short sided view of outdoor recreation when it says "snowmobiling may be permitted on trail sections designed as recreational, provided such use does not interfere with snow-shoeing, ski-touring and hiking." The Statement concludes that snow-shoeing, ski-touring and hiking are to take preference over snowmobiling, without any specifications, even by innuendo, let alone sufficient valid data, as to the actual amount of visitor days or potential use the various types of outdoor recreationists might make of the North Country Trail. Of course, these statements are even more valid when applied to off-road motorcycling which is eliminated by not even being mentioned.

3. M - Interrelationship with Other Plans and Developments. We would say that if "the North Country Trail is in accord with the trail needs of State Comprehensive Outdoor Recreation Plan of the states involved" then those plans are in direct conflict with the

Nationwide Outdoor Recreation Plan of 1973. We would demand that the Statement document the claimed accord with the State Comprehensive Outdoor Plans and explain the obvious conflict with the Nationwide Outdoor Recreation Plan. 8

The Interstate Commerce Commission policy regarding railroad abandonment (Public Law 93-236) equally provides for the possibility of utilizing abandoned railroad rights-of-way for off-road motorcycling trails. The Statement's denial of this fact by omission is another indication of its inadequacy and its bias.

II. Description of the Environment. Given the fact that the North Country Trail is 3,246 miles long and potentially 10 miles wide and that no specific 200 feet wide areas have been presently specified, it necessarily follows that the Statement cannot even inadequately assess the environmental impact of whatever trails are actually chosen for development or acquisition. The Statement specifies that the trail will traverse several of our national forests but does not indicate how the proposed North Country Trail complies with the management policies of those various forests which have been established in accordance with Executive Order 11644. As regards the trails in these national forests, the Statement fails to specify their present use, fails to assess the impact of utilizing them for the restricted proposed North Country Trail and totally fails to take into account the need for providing alternative trails for those who will be deprived of the present use of the trails. 9

A specific instance of a conflict which is resolved in the Statement by completely ignoring its existence is the Buckeye Trail in the State of Ohio. Prior to its designation as "Buckeye Trail" certain segments of this trail were and still are township roads, logging roads and public thoroughfares. In many cases these trails were utilized by off-road motorcycles prior to their being named "The Buckeye Trail" by those who would restrict their use to hiking. 10

It is interesting to note the attention to scenic environs for the proposed trail. The Statement denies the rights of those members of the American public who choose to utilize off-road motorcycles as a means of viewing those scenic areas. The Statement fails to set forth why horsemen, hikers, ski-tourers, and snowmobilers have "the right" to enjoy these scenic areas while off-road motorcyclists do not have equal rights. 11

According to the Statement, in 1970 approximately 1/2 of the nation's population inhabited an area within 300 miles of the proposed trail. We would point out that therefore, also approximately 1/2 of the nation's motorcyclists could also be claimed to inhabit an area within 300 miles of the proposed trail. Actually, in 1973, 909,299 registered motorcycles were owned by residents of just the eight state area, not counting the contiguous states. We would point out that the number of off-road machines, which are not required by law to be registered in certain of those states, would increase that number substantially.

II. E - Land Use. Table V of this section and section F. states that present uses of the trail corridor are predominantly "agricultural and forest." The Statement fails to indicate what percentage of the agricultural and forest lands are utilized at the present time for recreation and how their use by the North Country Trail will affect the present users of those lands. The Statement admits that much of the area through which the North Country Trail will pass is forested and it varies in condition from forested to logged to newly planted. Thus the effects of routing the North Country Trail through such areas and its use, once established, would also vary. That is, use of newly planted forest by hikers or horsemen or any other outdoor recreationist raises potential for damage which the Statement fails to explore. The Statement also fails to take into account dangers to users from logging operations. It omits explanation of how the proposed uses will supposedly not adversely affect the forest yet it continues to not mention off-road motorcycling as a potential use or to give any reason for its omission.

The same comments are applicable to the major agricultural sections.

The Statement admits that certain land uses in urban and developed areas along the proposed trail corridor are to be considered as environmental intrusions and that there is going to be conflict as shifts in land use occur. The Statement is deficient in that it totally fails to estimate the extent of those environmental intrusions. It fails to attempt to forecast the "foreseeable shift in land use" and its effect upon the future desirability of the North Country Trail both in design and concept, as well as applicability for its intended, even though obviously restricted, uses. The Statement is also silent as regards the future effects, both advantageous and disadvantageous, of the existence of the North Country Trail on the future development of the areas through which it passes.

III. A - Impact on Vegetation. Since the Statement proposes to utilize abandoned railroad right-of-ways in more than 300 miles of existing trail, as far as those abandoned railroad right-of-ways and existing trails are concerned, it stands to reason that no claim could be made by the Statement that the use of off-road motorcycles would result in further substantial environmental impact on those areas.

III. B-C - In the discussion on impact on soils and air and water quality it is admitted that such impacts depend upon the type and intensity of use and the type of soil and terrain. We would point out that such general statements are equally true for all forms of outdoor recreation in assessing their impact on soil and air and water quality. Every use, no matter what its type and character has impact on soil and air and water quality. The question to which the Statement fails to address itself is whether or not those impacts are of the extent to be considered damage. In the instance of off-road motorcycling no attempt is made by the Statement to assess its effect. It only continues to assume that such impacts are not acceptable, though not specified.

The Statement points that intensive use would cause soil compaction and could lead to problems of organic waste disposal, even to the extent that animal waste could infiltrate local streams of water bodies. We would point out the continued inconsistency of the Statement in admitting that intensive use can cause such serious impact and damage yet assuming that impact is acceptable, in some cases even desirable, while excluding off-road motorcycling, a highly popular form of outdoor recreation, from consideration.

It is inconceivable that the Statement could contend as regards soil, "impacts are expected to be local and of minor significance" when it also estimates the capacity of the trail be 400 persons per day per mile. To attempt to pass off the impacts of 400 users per day per mile to the soil as "local and of minor significance" is so ridiculous as to insult the intelligence of the readers of the Statement.

As regards sub-paragraph 3-C concerning the designation of "scenic" as necessarily prohibiting the use of motorized vehicles to avoid problems of mechanical noise and exhaust emissions, we point out our previous comments as to the rights of the American citizens who choose to utilize motorized vehicles and enjoy scenic areas to be able to have that enjoyment.

III. D - Impact on Fish and Wildlife. The Statement admits that the trail could open up formally inaccessible land to hunting and fishing. It totally fails to assess the impacts upon wildlife, upon removal of vegetation, and upon the long-term ecological effects of such opening up of inaccessible areas.

16

III. F - Impact on Historical and Cultural Features. The Statement specifies that some of the areas of archaeological and historical significance will become accessible to trail users because of the North Country Trail. It continues to be deficient by failing to set forth how such areas are going to be protected from vandalism and the other misuses which it admits are potential problems.

17

III. G - Impact on Recreation. Continuing to ignore the effects of prohibiting off-road motorcycling, the Statement in this section fails to include or assess the demand for off-road motorcycling areas within the eight states through which the North Country Trail is planned. Finally on page 74 of the Statement comes for the first time the admission that the omission of motorcycling from mention as a potential user of the North Country Trail is "because the use of these vehicles tends to be pre-emptive and occurs during the main hiking season." We would point out that the Statement does not define "the main hiking season," nor does it in any way attempt to justify its conclusion that the use of motorized vehicles is "pre-emptive." We would point out again that the concept of pre-emptiveness is also a two-way street. The Statement does condescendingly state that "where the demand for such use is high, the report recommends that separate trails specially for motorized vehicles use be provided." We would point out that the statement is deficient in its failure to specify the various demands for the uses for which the Statement intends the North Country Trail to be used. In accordance with its condescending admission it can as aptly be stated that demand for all forms of recreational use along the proposed route of the trail should be assessed and that segments of the trail should be set aside in accordance with the percentages of the demand prevalent in the area.

18

III. H - Impact on Land Use. It is inconceivable that the Statement would shrug off the impact of a trail of the magnitude of the proposed North Country Trail upon present land management policies or practices by concluding that such action is "not expected to materially impact" such policies or practices. It is inconceivable that the possibility of 400 hikers per mile per day on a trail, much

of which doesn't even exist at the present time, would not have a material impact on present land management policies or practices. In some cases the North Country Trail and its construction will result in land management policies and practices being imposed for the very first time. If this is not material impact the Statement is additionally deficient for not defining what is.

In this section during the discussion of when the trail crosses ecologically fragile land such as sand dunes or wet lands it is pointed out that the land administering agencies will retain authority to curtail use which might impair or damage natural values. If land management agencies at the present have the authority to correctly protect those areas, then the Statement leaves the reader to wonder why it feels the necessity to make the decision for such land administering agencies that off-road motorcycles are not to be allowed at all.

19

The Statement specifies that the trail will probably generate the development of recreation related businesses and such development could contribute to a degradation of the trail experience for some users. It is additionally deficient in its failure to estimate the degree of development of recreational related businesses and the proportional degree of degradation of trail experience for users of the trail.

20

III. K - Impact on Highways and Utility Lines. The Statement fails to assess the affects on existing highways of increased traffic to access points on the trail and to estimate the increased likelihood of traffic accidents, jams and necessary management and corrective measures to alleviate and eliminate such potential problems.

21

III. L - Impact Related to Visitor Use. The content of this paragraph of the Statement and the proposition that "visitor use of the trail would vary in impact upon the environment depending upon intensity of use, particularly in relation to environmental conditions of the trail itself" is a general statement which is applicable to all forms of outdoor recreation, regardless of their type. The Statement acknowledges that intensive use of trail facilities could cause problems of accumulation of human waste and also that segments of the trail on which horseback riding might be permitted can also sustain problems of soil impaction and accumulations of animal waste. However, this

admission does not prevent the Statement from concluding that "with national scenic trails designation, the use of motor vehicles will not be permitted." It seems that human waste and animal waste would not detract from the scenic nature of the trail, but motor vehicles would. We would point out that motor vehicles do not leave human waste or animal waste. While not experts on human waste or animal waste we would contend that some persons might feel that exhaust emissions and noise from motorized vehicles would be preferable to accumulations of either type of waste.

This section of the Statement also admits that littering and vandalism will probably occur as a result of the recreational uses planned in the limited proposals. These adverse effects of the proposed forms of outdoor recreation also seem to be accepted without question, as a necessary ingredient of providing outdoor recreation for users of the type of outdoor recreation planned. The Statement totally fails to justify this acceptance of adverse effects of all other forms of outdoor recreation and totally fails to justify the omission of motorcycling because of unnamed and unspecified, although implied by innuendo, effects of motorcycling.

22

IV. Mitigating Measures Included in the Proposed Action. Off-road motorcycling is also prone to the use and benefits of mitigating measures, such as the trail standards recommended in the proposed report. Control devices, erosion control and elimination devices, etc., all apply to off-road motorcycling trails.

23

This section concludes with a paragraph concerning "sound land management programs in accordance with established multiple use principles." We would point out that the omission of off-road motorcycling facilities on the proposed North Central Trail is in direct contradiction with "established multiple use principles."

V. The Statement admits that all the disturbances of soil and vegetation associated with trail facility development are considered adverse and avoidable. We would disagree with the contention of the Statement that the vegetation which will have to be removed will be minor in loss given the fact the over 1,700 miles of new trail are proposed in the Statement. Again, the Statement admits that some adverse impacts will inevitably result from recreational use and misuse of the trail and that normal use and maintenance will prevent the return of vegetation

cover and cause some soil compaction and disturbance to wildlife. However, it continues to describe these impacts as "minor" and accepts them as a necessary result of providing facilities for outdoor recreation of the types contemplated. The Statement acknowledges that more serious impacts could occur as a result of overuse and that such serious impacts are not unavoidable given proper trail management. Yet it completely fails to acknowledge that trailbiking, like the proposed forms of allowable outdoor recreation, is amenable to proper trail management. Given proper trail management any serious impacts from off-road motorcycling could also be alleviated.

24

VII. Any Irreversible and Irretrievable Commitments of Resources Which Would be Involved in the Proposed Action Should it be Implemented. The Statement admits that its proposals are planned to be permanent in their commitment to recreational use. The off-shoot of this for off-road motorcyclists is that they are to be permanently deprived of the right to ride on 3,246 miles of trails in their United States while hikers, horsemen, snow-shoers, etc., are allowed.

25

VIII. A.5 - Establish a North Country National Scenic Trail. The Statement was prepared by employees of the Lake Central Region Office of the Bureau of Outdoor Recreation of the United States Department of the Interior. All of those agencies are United States government agencies. The United States government is intended to represent the people of the United States, its citizens. Millions of those citizens ride motorcycles. 58.2 million activity days, by BOR statistics, were spent riding motorcycles off-the-road in the summer of 1972. Yet the Statement and its authors advocate a scenic trail status, that is, total prohibition of motorized vehicles, which they state will "provide for the highest quality recreational experience." We submit that the conclusion that motorcycling is a lesser quality recreational experience than hiking or horseback riding, or ski-touring, is totally beyond the bounds of the authority and limitations of the Bureau of Outdoor Recreation and its employees. The Bureau of Outdoor Recreation was not intended to tell the American people what forms of recreation were best for them, but was intended to provide facilities and means for which the American public could engage in the forms of recreation in which it is interested and which it enjoys. 58.2 million activity days in one summer, two years ago, points out the degree of that enjoyment and interest.

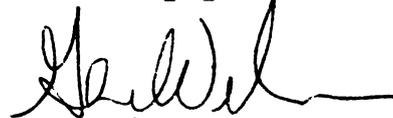
26

Mr. John Cherry
December 9, 1974
Page 12

As stated in Outdoor Recreation - A Legacy for America on page 52, "the federal government owns much property and must recognize the variety of recreation opportunities associated with its lands." This recognition of variety does not contemplate the designation or listing of preference by employees for the citizens of the United States as to what forms of outdoor recreation they prefer or think are of higher quality. What is required is objective data, not subjective opinions.

Not only does the Draft Environmental Statement for the North Country Trail fail miserably to correctly and completely assess the environmental and other impact of the proposed trail but its authors and issuing office have shirked their duty to recognize the variety of recreation opportunities associated with the lands of America. The American Motorcycle Association contends that the Draft Environmental Statement for the Proposed North Country Trail is totally deficient and any attempt to construct such trail or enact legislation to provide for its construction will be in opposition to the dictates of the National Environmental Policy Act and will be suspect to challenge.

Sincerely yours,



Gene Wirwahn
Legislative Director

GW/cb

General Response

Motorcycles have not been ignored; they are prohibited by the National Trails System Act (P. L. 90-543) from using a national scenic trail. Because they are prohibited, the demand for their use and the subsequent impacts of that use are not discussed. In addition, the draft environmental impact statement (Page 74) states that motorcycles and motorbikes are believed to be a preemptive use that would cause too many conflicts with hikers, bicyclists, and equestrians. Demand for trail use of motorized vehicles was considered in the recommendation for alternate trails.

Response to Specific Comments

1. The reviewer did not understand the proposal or the Congressional directive under which the Bureau made the study. Trails for America is background for the National Trails System Act (P.L. 90-543) which directed that the North Country Trail be studied for potential designation as a national scenic trail. The Nationwide Outdoor Recreation Plan, Outdoor Recreation--A Legacy for America, refers to both national scenic trails and national recreation trails and recommends a concentrated effort to complete the reports on the 14 potential national scenic trails described in P.L. 90-543. The report's recommendation that alternate trails be provided for motorized vehicles is a recognition of their recreational use.
2. See General Response.
3. See General Response. The use of snowmobiles on the existing trail in the Chequamegon National Forest and subsequent loss of recreational opportunities if that trail segment were designated a scenic trail were discussed in Section III. 6. Impact on Recreation, page 74 of the draft environmental impact statement. With the exception of the trail segment in the Chequamegon National Forest and some sections of the towpath in the Old Erie Canal State Park, which allow snowmobiles, none of the existing 337 miles of trail are open to motorized use. Thus existing recreational opportunities would probably not be lost as a result of the proposal (see page 94).
4. This information has been discussed in Section II. Description of the Environment, D. Landownership, and E. Land Use.
5. The North Country Trail was studied as a national scenic trail on which motorized vehicles are prohibited by P.L. 90-543. Provision for the use of snowmobiles is a special situation, since these vehicles are to be used in the winter when the ground is protected by sufficient snowcover and use by other activities is low. See also General Response on the preemptive use of motorcycles and the recommendation for alternate trails.

6. See General Response.

7. "Non-consumptive" is a difficult concept to define. To avoid confusion, we have deleted this term. More explanation regarding uses of the trail has been added to this section, including the reasons for excluding motorcycles.

8. Each State plan has been referred to individually in the final environmental impact statement (EIS). Based on needs analysis which each State determines, a need for hiking trails is shown for seven of the eight States involved. The North Country Trail, which would provide a facility for hiking, is therefore in accord with the State plans. This does not mean that there are no needs for other recreational activities within a State.

9. There is no conflict with EO 11644, Use of Off-Road Vehicles on the Public Lands. The North Country Trail would be considered as a potential trail as the Forest Service establishes management plans for the national forests through which the trail would go. Thus, the Forest Service (and other Federal agencies) has the option of designating the North Country Trail closed to motorized use in accord with the provisions of EO 11644. In addition, Section (2)(4) states:

Areas and trails [for motorized use] shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in areas of the National Park system, Natural Areas, or National Wildlife Refuges and Game Ranges only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values.

Existing trails may be incorporated into the North Country Trail. This will be a management decision. Forest Service trails which could be incorporated are the North Country Trail in the Chequamegon National Forest and trails in the Allegheny National Forest. As stated in the EIS (Page 74), this trail in the Chequamegon National Forest is currently used by snowmobiles and thus use would be foregone if the trail were incorporated into the national North Country Trail and designated scenic. A portion of this trail traverses the recently designated Rainbow Lake Wilderness Area. By law, motorized vehicles are not permitted in designated wilderness areas. The trail in the Allegheny National Forest is a hiking trail with no motorized use permitted.

The recommendation for alternate trails was discussed on Page 74 of the draft EIS.

10. The Buckeye Trail was discussed in Section II, Ohio. Table I, "Existing Trail Mileage," also discusses the Buckeye Trail. Sections of this trail parallel the North Country Trail corridor but are not suitable for incorporation into the North Country Trail because the Buckeye Trail is primarily located within road rights-of-way.

11. See General Response and Response No. 5.

12. The use of the corridor concept allows for the careful location of the trail tread with respect to land use and management policies, including forest management. See previous responses on motorcycles.

The extent of environmental intrusions was not estimated because of the corridor concept. Additional discussion of the secondary impacts of trail-related development has been added to Section III. Impact on Land Use, in the final EIS. Economic impact of the trail was treated in Section III of the draft.

13. Most of the reviewer's comments on the impact sections deal with the lack of discussion of the impacts of motorcycles. This was not discussed in the EIS because motorcycles are not permitted on national scenic trails nor recommended for any portion of the North Country Trail which might be open to snowmobiles. The reasons for this exclusion and the recommendation for separate trails were discussed in Section III of the draft EIS and have been emphasized in the final statement.

14. The purpose of an EIS is to recognize the probable impacts. That such impacts are discussed does not mean that they are desirable or acceptable.

15. The capacity figure of 400 persons per day per mile has been revised to 150 persons per day per mile to reflect a suggested design capacity. While the earlier figure assumed adequate trail management to handle this use, it has been revised downward to maintain a high quality visitor experience.

16. We have consulted with the Fish and Wildlife Service and they have indicated that the impacts of providing trail access to areas presently inaccessible would apply locally and be minimal. The impact on fish and wildlife would result from increased use which carries the potential of overuse. This could be expected to occur on a local basis near major population centers and where road access to the trail is plentiful. In the case of hunting, where road access to the trail is more than two miles away from the hunting area, very little use would occur. More use of the fishery resource than game resource would occur. Local use of trout streams could result in overuse, but impacts are expected to be minor. These impacts can be mitigated by management of the resource, such as disallowing hunting, reducing fish limits, etc. Discussion of these impacts has been added to Section III, D., Impact on Fish and Wildlife and IV. Mitigating Measures.

17. The manner in which problems are to be handled will be a part of master planning. Any property on the National Register for Historic Places which would be impacted by the proposal would be protected in compliance with Section 106 of the National Historic Preservation Act of 1966 and Executive Order 11593.

18. See General Response to the reviewer's comments. The main hiking season is considered to be from mid-May to mid-October or longer, depending on climate. Section I. L. Satisfying Recreation Needs, has been revised and now includes this information.

19. That some impact on land use will occur was discussed in paragraphs three and four of this section in the draft EIS. These are mainly in the form of restrictions on changing the landscape within the trail right-of-way or scenic easement. More discussion regarding the impact on forestry management has been added to the final EIS (page 95). Other than the impacts discussed in paragraphs three and four, the proposal is not expected to substantially impact existing land management policies.

The proposal assumes a high level of management and administration of the trail. Given this administration, it is believed that the trail can be located and used without causing a great deal of disruption.

The sentence, "The proposed action is not expected to materially impact present land management policies or practices" is very broad but is explained by the following sentence: "The design, operation, and maintenance of the trail would be done in a manner consistent with. . . management objectives on either public or private lands." Perhaps we are too optimistic.

20. Additional discussion on secondary impacts due to recreation-related development has been added to this section. Estimates of the amount of such development are not practical at this time.

21. The final EIS has been revised to reflect the possibility of increased traffic. Highway related secondary impacts (e.g., recreationists going on a backpacking trip instead of driving for pleasure) and mitigating measures (e.g., using public transportation) have also been added to the final EIS.

22. Human waste is not expected to have a significant impact on the environment since sanitary facilities would be provided. See response No. 14 for the purpose of an EIS. The reasons for excluding motorcycles on the North Country Trail have been given several times. See General Response.

23. We agree that trails can be set aside and managed for motorcycle use. Such trails could not be a part of a national scenic trail, and other uses of such trails would not be compatible with motorcycle use.

Recreation is a use included in multiple use principals of Federal lands. That one use is permitted and another excluded does not violate or contradict these principals.

24. See General Response (page 239)

25. The Congress, in passing P.L. 90-543, prohibited motorized vehicles on national scenic trails. All persons will be welcome to hike on the North Country Trail but not ride motorcycles on it.

26. The Bureau of Outdoor Recreation has recognized motorcycling as a legitimate form of recreation. The reviewer is apparently confused as to the Bureau's role in preparing the report and EIS on the North Country Trail. We again refer the reviewer to the National Trails System Act of 1968, P.L. 90-543, which directed a study of the North Country Trail to determine the desirability and feasibility of designating it a national scenic trail and which in Section 7(c) stated that motorized vehicles were to be prohibited on national scenic trails.



THE APPALACHIAN TRAIL CONFERENCE

P. O. BOX 236, HARPERS FERRY, W. VA. 25425

November 8, 1974

Regional Director
United States Department of the Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, MI 48104

Dear Sir:

This letter is in response to the draft environmental impact statement for the proposed North Country Trail which the Conference received last month. We have reviewed this document and discussed it with our member clubs involved, the Green Mountain Club of Rutland, Vermont, and the Keystone Trails Association of Lebanon, Pennsylvania. Our response follows.

We enclose copies of our member clubs' responses to this statement with this letter, specifically the Green Mountain Club resolution of September 28, 1974 from John W. Nuffort, and the letter of September 17, 1974 from Maurice J. Forrester, Secretary of the Keystone Trails Association to BOR Lake Central Region. The Appalachian Trail Conference supports the statements of its member clubs in this matter.

If we understand your draft proposal correctly, it is your intention to open sections of the North Country Trail to snowmobile use. It is our understanding from ongoing involvements with the implementation of the National Trails System Act (Public Law 90-543) that "the use of motor vehicles by the general public along any national scenic trail shall be prohibited..." (section 7c). To this end the Appalachian Trail Conference could not support a proposed North Country Trail open to snowmobiles as this seems to be contrary to existing law.

Interpretation of the law, of course, is another matter from compatibility of uses and we find ourselves in complete agreement with Mr. Forrester's statements on this matter. Snowmobiling is not compatible on the same trail at the same time with non-motorized useage.

Regional Director, U.S. Dept. of Interior, Nov. 8, 1974, Page 2.....

In regards to the proposed connection of the North Country Trail with the Appalachian Trail in Vermont we are frankly confused. The location as described in the draft environmental impact statement is entirely different from any of the various proposals that were discussed at length before, during and after the hearings on this subject last fall.

The Green Mountain Club position was at that time clear to us, that they did not wish the proposed North Country Trail to intersect with the Long Trail Section of the Appalachian Trail, and in fact, that they felt the location of the North Country National Scenic Trail in the state of Vermont would be a detriment to their existing Trail system. At that time there was a discussion of possibly connecting the proposed North Country Trail with the Appalachian Trail further south in the Berkshires of Massachusetts. This new proposed location of the North Country Trail comes as something of a surprise. To repeat, we support the September 28, 1974, resolution of the Green Mountain Club and would like to hear from you how this new location of the North Country Trail in Vermont was arrived at.

We were pleased with the sensitivity for the need to continue volunteer activities in the future development of all trails in this country evidenced in this proposal.

We look forward to hearing from you at your convenience.

Best regards,



Peter H. Dunning
Special Projects

Enclosures: (2)

cc: Keystone Trails Association
Green Mountain Club
Stanley A. Murray

MP

Letter dated November 8, 1974, from the Appalachian Trail Conference

1. The proposal recommends a combination trail with "scenic" and "recreational" components. Snowmobiles would be allowed on recreational segments. In accordance with P. L. 90-543, no motorized vehicles will be permitted on "scenic" segments. See response No. 2 to the Ohio Department of Natural Resources.

2. The report and final environmental impact statement have been revised to indicate Vermont's position regarding the North Country Trail. See response No. 1 to Vermont's Agency of Environmental Conservation.



MISSISSIPPI HEADWATERS CHAPTER
AUDUBON SOCIETY

P.O. Box 193
Bemidji, Mn. 56601

December 10, 1974

Lake Central Regional office Ann Arbor, Michigan
Bureau of Outdoor Recreation
Dept. of the Interior

Re: North Country Trail Draft Environmental Statement

Gentlemen:

While our comments were not officially requested, we of Mississippi Headwaters Chapter, National Audubon Society would like to add our comments regarding the North Country trail.

We strongly urge and recommend that the original intent as outlined in Trails for America, 1966 be followed. That the North Country trail be for its entire 3246 miles, a national scenic trail with use limited to walking, hiking horseback riding (where compatible), and snowshoeing and ski touring. This would best serve to keep the trail a scenic, historical, natural and cultural experience for all concerned. The trail should remain as stated on page 7, a simple facility for foot use. Snowmobiling is not compatible with other winter uses such as ski-touring, snowshoeing, hiking and birdwatching. Not only does the noise (decibels of 73 and upwards) destroy the possibility of quiet communion with nature but in addition, is physically dangerous to other trail use and as ski-touring, snowshoeing etc.

We have over 5,000 miles of snowmobile trails already, in Minnesota alone. I am sure similar statistics prevail in Michigan and Wisconsin. There are less than 100 miles of designated cross-country ski trails and none so designated for hiking, snowshoeing etc. The popularity of ski touring has increased dramatically over the past 2 years as has snowshoeing and general winter hiking. There are now 10 ski touring clubs in existence with more on the way. There are clubs in Bemidji, Walker, Grand Rapids and Duluth. Additionally, there are new Audubon chapters in Bemidji, Grand Rapids, Pine River, Crookston and Moorhead. All of these clubs are composed of people who want and need the facilities offered by the trail on a year round basis. A trail which will give all users the opportunity to leave behind our mechanized, tension filled society for a few hours or a few days. For these reasons, we urge that the trail be limited to uses of a non-consumptive nature as outlined on page 16



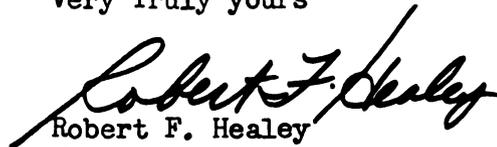
MISSISSIPPI HEADWATERS CHAPTER
AUDUBON SOCIETY

P.O. Box 193
Bemidji, Mn. 56601

of this draft statement. Again, we reiterate, snowmobiling is not compatible with other uses of a non-consumptive nature and in fact, precludes use by such activities as snowshoeing, ski-touring and hiking due to the destruction of peace and quiet, the possibility of physical injury and destruction of ski-tour tracks. Snowmobile have their place on ~~our~~ public lands but not on the North Country Trail!!

We are in basic agreement with all other facets of the proposal especially participation in construction and maintenance of the trail. Mississippi Headwaters Chapter, National Audubon stands ready to do ~~our~~ part and I'm sure so are the Minn-Tour Ski-touring clubs and other organizations

Very Truly yours


Robert F. Healey
Vice-President

Letter dated December 10, 1974, from the Mississippi Headwater Chapter,
Audubon Society

See response to letters from Keystone Trail Association and Mr. and
Mrs. Alan Hausrath.

•



BUCKEYE TRAIL ASSOCIATION INCORPORATED

P. O. Box 254 Worthington
Ohio. 43085

4 December, 1974

Mr. William Green,
Bureau of Outdoor Recreation,
U. S. Department of Interior,
3853 Research Park Drive,
Ann Arbor, Mich. 48104

Dear Bill:

It was good to talk to you again today and we are interested in your proposed new Trails news-letter. This will offer a vehicle for the several states to share information and concerns and we will be glad to cooperate to the best of our abilities. In this connection, I am enclosing four short items which you may use at your convenience as my personal contributions.

Also enclosed is a belated contribution to the North Country Trail Report analysis. These have not been discussed with our Board, but do faithfully represent the policy and philosophy of the Buckeye Trail Association Board, I believe.

The grant from the Columbus Foundation, reported in one of the news items enclosed, is most encouraging to us and we believe it will be in the nature of a permanent financial aid to the Buckeye Trail project, provided the association carries out the project faithfully and in accord with the plans as presented to the Foundation in our request for the grant. I have great hopes for this grant leading to other grants and leading eventually to the establishment of a permanent, secure trail corridor across Ohio.

Best regards.

Sincerely,

Robert R. Paton,
Executive Director

cc John P. Bay

COMMENTS ON THE NORTH COUNTRY TRAIL REPORT

By Robert R. Paton,
Executive Director
BUCKEYE TRAIL ASSOCIATION

The Buckeye Trail Association is in accord with the proposal that there be a North Country Trail established and that it traverse Ohio along the corridor as outlined in the report. We believe that this route is appropriate and acceptable, at least for the beginning effort.

Flexibility of Route. The trail corridor as designed gives latitude for changes locally as needed. It is anticipated that other changes may prove advisable from time to time and we assume that these changes can be accomplished through the proposed State-level North Country Trail Councils. No trail route is static; it must be subject to improvements, changes due to economic developments, changes due to geographic considerations, and changes due to unexpected local developments.

The Buckeye Trail Association expects to change some parts of the Buckeye Trail route to coincide with parts of the North Country Trail if and when this seems advantageous. We should expect the converse to be possible also in future years, where they do not now coincide.

Federal Aid. The possibility of federal assistance financially in the creation and maintenance of the North Country Trail is encouraging. It is anticipated that these federal aids may be in the form of matching grants and this type of aid will be welcome. In other cases there should also be federal aid regardless of whether there is also local funding. This is to be a national trail with national interests and goals and should not be dependent on local support at all times.

State Councils. The establishment of state-level councils is essential to the sound development of the project. The BTA will welcome and accept representation on the Ohio Council.

Little Miami River Segment. The North Country Trail route follows the valley of the Little Miami River, a national scenic river, and it should be noted that the State of Ohio is now developing this valley through a land acquisition program. The Department of Natural Resources has established a staff member whose duties are specifically to plan and develop a program of state ownership of appropriate areas in this valley. The BTA is also planning its trail route with this project in view and the two agencies are coordinating their efforts.

North Country Trail comments, continued

Canal Lands. The various areas where the route follows canal towpaths have been made more secure by the transfer of these lands to the Department of Natural Resources and this is encouraging. This transfer has been authorized by an act of the General Assembly known as the State Trails Act, which does much to further the concept of recreational trails in Ohio. The Department of Natural Resources is the agency which will implement the act.

Continuous Trail Concept. The BTA has the philosophy that there is value in continuous trails and so we agree with the North Country Trail philosophy. This type of trail does project some problems for short distance hikers and the BTA has developed a guidebook of 18 recommended short (three to six miles) hikes on the Buckeye Trail with instructions where to park the car for each hike and then how to return to it at the end of the hike. Some guidebook of this nature may be needed in each state for the North Country Trail.

2

Comments dated December 4, 1974, from Robert R. Paton, Executive Director
of the Buckeye Trail Association

1 & 2. As a part of the public record, this data is available to the Trail Council for consideration during route selection and master planning.



FINGER LAKES TRAIL CONFERENCE INC.

635 Elmira Road
Ithaca, New York, 14850
2 December, 1974

Anthony M. Corbisiero
Deputy Regional Director
United States Department of Interior
Bureau of Outdoor Recreation
600 Arch Street, Federal Building 9310
Philadelphia, Pennsylvania 19106

Dear Mr. Corbisiero:

At a meeting of the Finger Lakes Trail Conference Board of Managers on 2 November, 1974, the Draft Environmental Impact Statement for the proposed North Country Trail (DES 74-84) was a major topic of discussion. Last fall the Finger Lakes Trail Conference endorsed the idea that the North Country Trail make use of sections of the Finger Lakes Trail, provided that Conference relationships with private landowners regarding trail permissions be continued on the present basis. This was communicated to Mr. Maurice Arnold, Northeast Region of the B. O. R. last November, 1973.

It would appear from Table II of DES 74-84 that about 99 per cent of the non-federal land along the proposed North Country Trail route in New York State is recommended for fee title acquisition. The Board wishes to know specifically whether condemnation of private lands is to be considered where North Country Trail coincides with Finger Lakes Trail. | 1

The next Finger Lakes Trail Conference Board meeting is scheduled for 19 January, 1975 at which time the North Country Trail will again be a major topic for discussion and consideration. Among questions likely to arise, important may be why other arrangements for private land in New York, such as easements, were apparently excluded in the impact statement.

Thank you for a timely reply. We hope to hear from you by 31 December, 1974, and certainly before our 19 January, 1975 meeting.

Sincerely yours,


Laura McGuire, President

copy to: Ervin H. Markert, Trail Chairman

Letter dated December 2, 1974, from the Finger Lakes Trail Conference

1. Table II was erroneous. It has been corrected to show that most of the trail in New York would be under agreements.



THE GREEN MOUNTAIN CLUB, INC.
— RUTLAND · VERMONT —

05701

October 2, 1974

Lake Central Regional Office
Bureau of Outdoor Recreation
Department of the Interior
Ann Arbor, Michigan

Gentlemen:

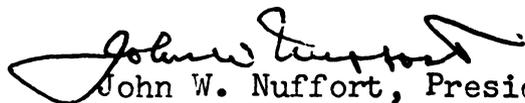
We are writing in response to your request for comment on the Draft Environmental Statement of the Proposed North Country Trail.

Two copies have been enclosed of the Resolution approved by our Trustees at the regular Trustees Meeting of September 28, 1974, held at Stowe, Vermont.

Please forward the extra copy to any other Department of the Interior office which requires one. We will appreciate an acknowledgment of this transmittal. Your response and further communications about the Proposed North Country Trail should be addressed to:

John W. Nuffort, President
The Green Mountain Club, Inc.
453 Victor Way
Wyckoff, N.J. 07481

Very truly yours,


John W. Nuffort, President



THE GREEN MOUNTAIN CLUB, INC.
— RUTLAND · VERMONT — 05701

RESOLUTION

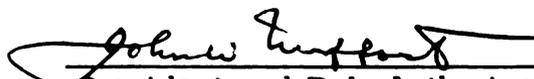
RESOLVED by the Trustees of the Green Mountain Club, Incorporated that:

1. IN GENERAL, it is the official position of the Green Mountain Club, Incorporated that the Appalachian Trail should be the only trail designated as a component of the National Scenic Trails System in the State of Vermont and that the Club opposes further expansion of the National Scenic Trails System in Vermont by the inclusion of other existing trails or the construction of any new trails.

2. IN PARTICULAR, the Green Mountain Club, Incorporated restates its firm opposition to possible designation of the Long Trail as a component of the National Scenic Trails System, and it further declares that it opposes any and all plans or proposals, including junctions, intersections or joint routing with other trails, to establish a route corridor for the proposed North Country Trail in or through the State of Vermont. Any new trail which intersects the Long Trail system will increase the usage of the Long Trail and result in unfavorable impact on: vegetation, soil, water quality, fish and wildlife, land use, land ownership and other aspects of our environment.

3. THE PRESIDENT of the Green Mountain Club, Incorporated shall employ suitable means to make the Club's official position known and clearly understood to the appropriate State and Federal agencies and to the representatives of those other organizations known to have a legitimate official interest in this matter.

Dated this 28th day of September A. D. , 1974.


President and Duly Authorized Agent

Letter of October 2, 1974, from the Green Mountain Club, Inc.

(Enclosed a Resolution of the Green Mountain Club, Inc., stating opposition to the expansion of the National Scenic Trails System in Vermont.)

This resolution is a matter of public record and will be available to the North Country Trail council for consideration.

International Snowmobile Industry Association

Washington, D. C. Headquarters
5205 Leesburg Pike
Falls Church, Virginia 22041
(703) 379-9100
Telex: ISIA FSCH 89-9439

October 18, 1974

Mr. John B. Cherry
Regional Director
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

On behalf of the snowmobile industry, I want to thank you for the opportunity to review the Department of the Interior's Draft Environmental Statement on the proposed North County Trail (DES 74-84). Since this proposed system traverses over half the length of the northern part of the United States and portions of the trail will be in rather close proximity to a large percentage of the people in the United States, it will be a definite asset to the country and a usable facility for those who enjoy the various forms of outdoor recreational experience that the trail system can provide.

We certainly are pleased to see that the Environmental Statement included the provisions for segments of the system to be considered as recreational trails and for possible use by snowmobilers. This multi-use concept is applauded and supported, as public lands belong to everyone and there is a growing and critical need for all types of recreational use areas.

Hopefully, the use of snowmobiles would be permitted on some sections regardless of snowshoeing, ski touring or hiking, instead of being permitted only if such use does not interfere with these other activities. The states of New York, Michigan, Wisconsin and Minnesota are estimated to have over three million snowmobilers; and these citizens should have the opportunity to enjoy their type of outdoor recreation on their public lands on an equal basis with other users.

Eastern Canada

Post Office Box 625
Station H.
Montreal, Que., Canada H3G 2L5
(514) 871-9121

Western Canada

3311 30th Avenue
Vernon, B.C. Canada
(604) 542-6124

Midwest U. S.

7851 Metro Parkway
Minneapolis, Minn. 55420
(612) 854-8005

Western U. S.

Post Office Box 17260
Salt Lake City, Utah 84117
(801) 278-2454

New England U. S.

Post Office Box 387
Bath, Maine 04530
(207) 443-4824

Eastern U. S.

Box 158
Marion, New York 14505
(315) 926-5196

Mr. John B. Cherry
October 18, 1974
Page Two

Based on the experience gained over the years, the general standards for trail construction listed in the draft document appear to be adequate and all-inclusive; and, thus, the original environmental impact adequately assessed.

Experience with snowmobile trails in the northern states, such as Wisconsin and Minnesota, over the years show that heavy snowmobile use in the wintertime has little or no affect on the amount of vegetation that is present during other seasons of the year. Therefore, the building of wider trails for snowmobiles may cause a very temporary removal of vegetation, but it will be of a very short duration or impact on the environment.

We agree that snowmobile noise and exhaust emissions on the recreational segments where such use is permitted would be expected to be local and of minor significance. To date, no one has established snowmobile noise emissions to be significant enough to consider them as a factor in the health and welfare of the general public.

The emission work performed on snowmobile engines by Southwest Research Institute, which you are no doubt familiar with, reported that as percentages of 1970 mobile source emissions, snowmobiles are estimated to account for 0.4% of hydrocarbons, 0.1% of carbon monoxides, 0.009% of oxides of nitrogen, 0.27% of particulates, and 0.009% of oxides of sulfur.

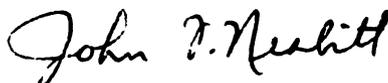
Also, since emissions from snowmobiles occur mainly in a few states and during only a few months of the year, their local impact may be more severe in some cases than may be indicated by national comparisons. It was noted, however, that snowmobile emissions being released in primarily suburban/rural areas and during leisure hours should not be significant in contributing to air pollution episodes associated with highway vehicles or industrial processes.

The use of snowmobiles on certain sections of the North County Trail System could result in a year-round impact on local economic environment since snowmobilers will contribute to the local economies by the purchase of lodging, food and gasoline during a period of time that is very slow in many of the rural areas of our northern states.

Mr. John B. Cherry
October 18, 1974
Page Three

In closing, again we wish to thank you for the opportunity to review the Draft Environmental Statement and to thank the Bureau of Outdoor Recreation for including the multi-use philosophy in the North County Trail system. If we can contribute anything that will assist the Bureau with the expansion of this multi-use philosophy, please let us know.

Sincerely,



John F. Nesbitt, P.E.
Vice President, Engineering

JFN/dlp
cc: M. B. Doyle
W. T. Jobe
D. Crandall

Letter of October 18, 1974, from the International Snowmobile Industry Association

1. Because of the preemptive nature of snowmobiles and the conflicts between snowmobiles and other winter trail uses, sections of trail developed for snowmobile use will have to be carefully selected. The Secretary's report recommends that snowmobiles not be permitted where there is substantial use by cross-country skiers, snowshoers, and hikers.
2. Information regarding emissions will be available to the Trail Council and will be considered during route selection and master planning.

KEYSTONE TRAILS ASSOCIATION



ALLEGHENY OUTDOOR CLUB—WARREN
ALLENTOWN HIKING CLUB
ALPINE CLUB OF WILLIAMSPORT
AMERICAN NESSMUK SOCIETY—BIRDSBORO
AMERICAN YOUTH HOSTELS—DELAWARE VALLEY COUNCIL
AMERICAN YOUTH HOSTELS—PITTSBURGH COUNCIL
ARMENIA APPALACHIAN CLIMBING CLUB
BATONA HIKING CLUB OF PHILADELPHIA
BLUE MOUNTAIN EAGLE CLIMBING CLUB OF READING
BRANDYWINE VALLEY OUTING CLUB
CHESTER COUNTY TRAIL CLUB
DELAWARE VALLEY CHAPTER, A.M.C.
HORSE-SHOE TRAIL CLUB
LANCASTER HIKING CLUB

LEBANON VALLEY HIKING CLUB
MOUNTAIN CLUB OF MARYLAND
OLD TRADERS PATH
PENN STATE OUTING CLUB
PHILADELPHIA TRAIL CLUB
PIONEER TRAILS COUNCIL
POTOMAC APP. TRAIL CLUB OF WASHINGTON
READING COMMUNITY HIKING CLUB
SPRINGFIELD TRAIL CLUB
SUSQUEHANNA APP. TRAIL CLUB OF HARRISBURG
SUSQUEHANNOCK TRAIL CLUB—POTTER CO.
SUSQUEHANNA TRAILERS HIKING CLUB OF WILKES-BARRE
WARRIOR TRAIL ASSN.—WAYNESBURG
WILMINGTON TRAIL CLUB
YORK HIKING CLUB

Affiliated With the Appalachian Trail Conference "Maine to Georgia"

R. D. 1, Box 91
Ramich Road
Temple, Pa. 19560

Regional Director
United States Department of the Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

SEP 17 1974

Dear Sir:

Re: D3819 NCT

The Executive Committee of Keystone Trails Association has reviewed the draft environmental impact statement for the proposed North Country Trail (DES 74-84). For the most part we found ourselves to be in agreement with the draft except as regards the matter of opening sections of the Trail to snowmobiles.

The statement refers to snowmobiling as being a compatible usage, when, as a matter of fact, snowmobiling is not compatible on the same trail at the same time with any non-motorized usage. Consequently, any sections of the Trail opened to snowmobiles would be effectively closed in the winter to hiking, snowshoeing and cross-country skiing.

In addition, we note that it is proposed to clear the sections to be opened to snowmobiles up to a width of 15 feet and to clear the overstory to a height of 10 feet above the anticipated snow accumulation level. Such wholesale clearing would leave a spring, summer and fall trail that is little more than an ~~an~~ unsightly scar, aesthetically undesirable as a footpath. The result then would be to make non-motorized travel on these sections of the Trail impossible in the winter and unattractive at other times.

U. S. D. I., B. O. R.

September 17, 1974

Page 2

It is our recommendation that where snowmobile trails are considered necessary or desirable, they might be located within the Trail corridor, but clearly separated from the main hiking trail. Ideally, the two trails should be far enough apart to keep the snowmobiles out of sight and sound of the non-motorized trail users.

3

Our objection is not to the creation of snowmobile trails, but only to the effort to use hiking trails for this purpose.

Sincerely,

KEYSTONE TRAILS ASSOCIATION



Maurice J. Forrester, Jr.
Secretary

Letter dated September 17, 1974, from the Keystone Trail Association

1. The draft environmental impact statement does not state that the use of snowmobiles is compatible with other winter trail uses. Where use of the trail by nonvehicle users is low, snowmobiling might be allowed. The environmental impact statement acknowledges the conflict between vehicular and nonvehicular uses.

2. Standards for snowmobile trails vary: 15 feet is a maximum width for two-way traffic. The State of Wisconsin has advised us that its standard is 12 feet. Clearance for equestrian and bicycle trails also requires more vertical clearance than a foot path. If sections of the trail are to accommodate the uses, they will have to be developed and maintained accordingly. The administering agency, State trail councils, and national trail council would consider the suitability of trail segments for various uses during the route selection stage.

3. The concept of two trails--one for hiking and one for snowmobiling--is a possibility. It would be more expensive. There is nothing in the proposal which prevents an administering agency from providing more than one trail within the corridor. The Secretary's report recommends that snowmobiling not be permitted where a trail segment is subject to significant use by skiers, hikers, and snowshoers and suggests that alternate routes be provided for snowmobilers if this situation occurs.

National Campers and



Hikers Association Inc.

"The Friendliest People in the World"

October 15, 1974

RWB74-106

United States Department of the Interior
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Attention: John De.Cherry
Regional Director

Subject: North Country Trail Draft Environmental Statement DES 74-84

Dear Mr. Cherry:

Enclosed are the comments to the subject statement as prepared for the National Campers and Hikers Association, Inc. The position paper has the support of our legislative committee and of our national executive board.

We appreciate your consideration in sending a copy of the subject statement for us to review. We had earlier sent to the Environmental Law Institute in Washington, D.C. for enough copies for our state associations in the eight-state corridor to review and to provide comments.

The day before we received a copy from your office, the Law Institute called to inform us that there was a 10¢ per page charge (\$12.30 per copy). We advised them to send one to our attention and to forget about the remainder. The copy from the Law Institute has since been given to Richard DeCabooter, the NCHA representative on the Michigan Congress of Camping Clubs (MCCC). Mr. DeCabooter is the Assistant State Director for NCHA and serves the MCCC as its president.

John D. Cherry
October 15, 1974
Page 2

Again, we appreciate your consideration. We wish to offer the assistance of the NCHA for any activity beyond the North Country Trail.

Very truly yours,
National Campers and
Hikers Association, Inc.



Robert W. Blatt
Legislative Director (U.S.A.)
11520 64th
Alto, Michigan 49302

Enclosure

POSITION PAPER
FOR
NORTH COUNTRY TRAIL

(Comments on Environmental Statement DES 74-84)

Prepared by
National Campers and
Hikers Association, Inc.

(National Offices at)
7172 Transit Road
Buffalo, New York
14221



Robert W. Blatt
Legislative Director (USA)
11520 64th
Alto, Michigan
49302

POSITION PAPER
FOR
NORTH COUNTRY TRAIL

1.0 INTRODUCTION

1.1 This position paper was prepared by the National Campers and Hikers Association, Inc., in response to the request of the U.S. Department of Interior in Federal Register, Vol. 39, No. 174, for public comment to Environmental Statement DES 74-84 for a proposed North Country Trail generally running from Vermont to North Dakota.

1.2 The National Campers and Hikers Association, Inc., (NCHA) with offices at 7172 Transit Road, Buffalo, New York 14221, represents approximately 65,000 families nationally, with approximately 30,000 families living in the eight states along the corridor of the proposed trail.

1.3 This paper was prepared as an input to the planning of a great American project which will benefit a majority of citizens by providing a genuine experience with their natural environment without causing undue harm to either themselves or to the environment.

2.0 SCOPE

2.1 The NCHA provides in this paper, an opinion of a segment of the national population who are dedicated out-of-door enthusiast and who are pledged to assist any organization or activity who supports improvements in out-of-door recreation.

2.2 This paper addresses itself to the major topics of Environmental Statement DES 74-84 and contains comments or recommended alternate solutions as applicable.

3.0 SUMMARY OF COMMENTS

3.1 The NCHA respectfully suggests that the negative impact of the North Country Trail is somewhat overstated whereas the positive effects are not described in such a manner so as to satisfactorily inform those who could find such an undertaking distasteful or otherwise unnecessary.

3.2 This paper recommends that citizen participation be utilized to the best advantage in planning, development, management, and maintenance of the proposed trail. The North Country Trail Council method of organization and the use of nationally and locally organized clubs for trail construction and trail maintenance are both highly recommended.

2

3.3 This paper recommends that the use of spur trails be given greater emphasis so that points of interest outside the boundaries of the trail corridor would be identified and would be given the prominence and publicity given the main trail.

4.0 COMMENT ON LOCATION AND DESCRIPTION

4.1 The Proposal

4.1.1 Although the NCHA did not make their interest known in March 1971, the NCHA respectfully requests that their national association and their related state associations within the eight corridor states be included with the list of private interest groups to be attached to the Final Statement.

4.2 Trail Alignment

4.2.1 A paragraph should be added which would provide for the use of spur trails to points of interest or to developed facilities that are outside the boundaries of the trail corridor. Identification of spur trails within the North Country Trail system would provide for immediate prominence and would publicize its existence as an available out-of-door activity. The availability of possible identification may further the development of spur or subsidiary trails or facilities. Examples are the Keweenaw Peninsula and Isle Royal, neither of which lie within the trail corridor.

3

4.2.2 Consideration should be given to at least temporary trail identification for segments that initially do not meet trail criteria. Examples are the segments in Ohio and Michigan that currently lie within the rights-of-way of roads. A deadline could be established for selecting an approved pathway.

4

4.3 Right-of-Way Land Acquisition

4.3.1 No comment at this time.

4.4 General Standards for Trail Construction.

4.4.1 No comment at this time.

4.5 Trail Facilities

4.5.1 Probably the description of trail facilities should actually list the types of personal facilities proposed; hand pumps and pit toilets in the less traveled and remote areas and pressurized water and modern restrooms in urban or heavily traveled areas.

5

4.6 Maintenance

4.6.1 No comment at this time except that NCHA would readily volunteer to assist in all forms of maintenance.

4.7 Trail Access

4.7.1 No comment at this time.

4.8 Administration

4.8.1 Administration, by national and state trail councils, as proposed by the draft statement is recommended by the NCHA.

4.9 Trail Costs

4.9.1 The draft statement addresses itself quite well to the estimated costs for trail acquisition, construction, and operation. However, the NCHA believes that actual cost can be greatly reduced by enlisting the volunteer help that private organizations, such as NCHA, are willing to contribute in construction and operation. Actual cost could be reduced to acquisition when necessary, some material, and some types of equipment.

4.10 Suggested Time Frame for Development

4.10.1 No comment at this time except that the assignment of North Country Trail identification to segments not yet meeting accepted standards could possibly shorten the time frame considerably. Realistic deadlines could be given for upgrading to the required standards.

4.11 Satisfying Recreational Needs

4.11.1 No comment except that more emphasis could be placed on personal benefits to be derived from the hiking and the out-of-door experience. Emphasis could be placed on the fact that after initial investments for trail development, very little or no cost is incurred by the actual user.

4.11.1 Continued

Consideration should be given to the fact that the low cost places hiking within the means of many American families who might not otherwise be able to share nature with others who have been exposed to the out-of-doors through other and more expensive pasttimes.

4.12. Interrelationship with Other Plans and Developments

4.12.1 No comment except that the draft and final statement should be brought up to-date to include other known developments in the trail corridor. In Michigan alone, the Thornapple and Rogue Rivers are being considered for national status and a new tents-only state park is being considered for the Muskegon County Duck Lake/Lake Michigan shores. All of these lie within the proposed corridor.

6

5.0 COMMENTS ON DESCRIPTION OF THE ENVIRONMENT

5.1 General

5.1.1 No comment at this time.

5.2 Description of a Possible Trail Route

5.2.1 Comment is reserved until actual trail alignment is proposed and discussed in Trail Council segment alignment meetings.

5.2.2 The writer of this paper wishes to compliment those who worked in the preparation of the draft trail route. It appears that ample consideration has been given to the best and most scenic route within the individual trail segments to provide a true out-of-door experience to a large number of people who otherwise would not have the opportunity.

5.3 Population

5.3.1 No further comment required.

5.4 Landownership

5.4.1 No further comment required.

5.5 Land Use

5.5.1 Land use problems are very well described in the draft environmental statement and in the space permitted. The federal government and several of the state governments have in the past or are currently discussing land use legislation that would permit construction of natural recreational

5.5.1 Continued

facilities and would protect encroachment by undesirable elements by prohibiting their intrusion. Perhaps the final statement could advise interested citizens and organizations of the necessity of proposed land use legislation and of the need to expedite its acceptance and adoption. Adoption of land use legislation today may be necessary for completion of the North Country Trail ten years from now.

5.5.2 Existing incompatible use shouldn't warrant such excessively negative comments in the final draft statement that the reviewer might discredit the positive aspects of the proposed trail. It is recommended that the more harsh descriptions of the existing environment be quickly followed by a positive statement.

5.6 Probable Future Environment Without the Proposal

5.6.1 No further comment except again, as in section 5.5 of this paper, the need for Land Use Legislation should be promoted.

6.0 COMMENTS ON THE ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION

6.1 Impact on Vegetation

6.1.1 No further comment except that the last sentence, "Impacts are expected to be local and of minor significance." could be moved to the beginning of the section (IIIA) to reduce the harshness of the final statement.

6.2 Impact on Soils

6.2.1 Same comment as Impact on Vegetation.

6.3. Impact on Air and Water Quality

6.3.1 Same comment as Impact on Vegetation.

6.4 Impact on Fish and Wildlife

6.4.1 No further comment except that trail value to sportsmen should be emphasized heavily.

6.5 Impact on Scenic Qualities

6.5.1 The last sentence, "Impacts are expected to be significant from a protective point of view." should be moved to the beginning of the

6.5.1 Continued

section (IIIE) to reduce the fears of those who would believe that their local scenic attraction might be harmed by the proposed trail.

6.6 Impact on Historical and Cultural Features

6.6.1 Same comment as Impact on Scenic Qualities.

6.7 Impact on Recreation

6.7.1 No further comment except that the nearness of the trail corridor to the urban areas could be re-emphasized. Many of the urban citizens who will now live within a reasonable distance of an out-of-door's attraction such as the North Country Trail are disadvantaged both economically and socially. With their special set of circumstances and problems, they have not previously had the opportunity to partake in a healthy recreation that requires such minimal prerequisites as a day or two away from work and transportation to the attraction.

6.8 Impact on Land Use

6.8.1 Refer to comment on Land Use, section 5.5.

6.8.2 The NCHA recommends that national and state farm and agricultural related organizations such as Farm Bureau, Grange, National Farmers Organization be advised of the plans for the North Country Trail, brought up to date on progress, and informed of the great social need for such a project so as to blunt any negative impact and attitude of the farmers and farm-land owners directly affected.

6.9 Impact on Landownership

6.9.1 No further comment except reference to comments of section 6.8.2.

6.10 Impact on Local Economy

6.10.1 Local governments (county and township) should be made aware of the need for out-of-door recreation facilities in their area. The existance of such an attraction as the North Country Trail can be theirs without any great capital expenditure on their part. This should make a favorable impression.

6.10.2 Table IV, "Estimated Man Years of Employment" and the adjoining text in the draft environmental statement seem to contradict the proposed North Country Trail Council concept of management described in section I.H "Administration" and the trail club concept of maintenance described in section I.F. Actual cost in man-years of employment would be greatly reduced, especially in the non-federal land areas, if the Trail Council/Trail Club concept of administration/ maintenance are actually used.

6.11 Impact on Highways and Utility Lines

6.11.1 Less emphasis should be placed on safety hazards placed on trail users crossing highways. Adequate signing on the few bisecting highways should be adequate where overpasses or underpasses don't exist. Pedestrian walkways could be added as the need arises and is recognized.

6.12 Impact Related to Visitor Use

6.12.1 Negative impact to new recreation and scenic areas should be de-emphasized. Greater emphasis should be directed to the lessening of visitor related impact on currently overused recreation areas now in existence. The North Country Trail should relieve some of the overcrowded conditions in many of our parks and recreation areas.

7.0 COMMENTS ON MITIGATING MEASURES INCLUDED IN THE PROPOSED ACTION

7.1 The NCHA suggests that section 6.7, comment on "Impact on Recreation", be reviewed for additional positive effects.

8.0 COMMENTS ON ADVERSE EFFECTS WHICH CANNOT BE AVOIDED SHOULD THE PROPOSED BE IMPLEMENTED

8.1 The NCHA suggests that section 6.12, comment on "Impact Related to Visitor Use", be reviewed for offsetting positive impact and that section 6.10, comment on "Impact on Local Economy", be also reviewed for offsetting positive impact.

9.0 COMMENT ON RELATIONSHIP BETWEEN SHORT-TERM USE OF ENVIRONMENT AND THE MAINTENANCE OF LONG-TERM PRODUCTIVITY

9.1 No further comment required.

10.0 COMMENT ON ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

10.1 No further comment required.

11.0 ALTERNATIVES

11.1 Trail Projects

11.1.1 The NCHA would recommend rejection of all trail project alternatives. The project should remain as in the proposal; a national scenic trail. | 7

11.2 Trail Administration

11.2.1 The NCHA recommends that the North Country Trail Council concept of administration be selected as described throughout the draft environmental statement. Initial trail development could proceed in the co-operative states, thus allowing the less co-operative states a little time to follow progress of the trail-council states.

12.0 COMMENTS ON CONSULTATION AND COORDINATION WITH OTHERS

12.1 Consultation and Goordination in the Development of the Proposal and Preparation of the Draft Environmental Statement

12.1.1 Although the NCHA was not represented as an organization at the public meetings prior to preparation to the Draft Environmental Statement, and although the NCHA ~~did~~ not request an opportunity to review the original proposal, the NCHA wishes to be recognized as being in support of the North Country Trail, and to the greatest degree possible.

12.1.2 The NCHA wishes to introduce our policy of sharing all out-of-door recreational facilities with all other activities as long as it is done in a safe and fair manner.

12.2 Coordination in the Review of the Draft Environmental Statement

12.2.1 The NCHA respectfully requests that the association be listed in the Final Environmental Statement as an interested organization.

Letter and Position Paper dated October 15, 1974, from the National Campers and Hikers Association, Inc.

1. The environmental impact statement should be objective and not justify the projects by emphasizing favorable impacts.
2. We agree. Citizen participation is encouraged. It is recommended that local governments, interest groups, and citizens work with their State North Country Trail councils.
3. Major potential connecting trails were listed on pages 14-15. Side trails of local significance could be developed by local initiative.
4. This and other suggestions in the position paper are part of the public record and will be available to the State and national trail councils when they are established.
5. See response No. 4 to the Environmental Protection Agency, page 163.
6. The text has been updated to show that the Rogue River has been designated a State "country/scenic" river. The Thornapple is still under study. There is no legislation proposing these rivers for national status at this time.
7. This comment is unclear. The proposal is a national North Country Trail with scenic and recreational components. The North Country National Scenic Trail is an alternative.

SKI TOURING COUNCIL

RUUDOLF F. MATTESICH, *President*

WEST HILL ROAD
TROY, VERMONT 05668
802-744-2472

September 13, 1974

Mr. John D. Cherry, Regional Director
United States Dept. of the Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

I wish to acknowledge receipt of your presentation on the proposed North Country Trail.

I am very happy about this development. I think it is the first definite step in the direction of creating East-West National Trails, which your department at our first meeting in Washington outlined.

I certainly want to congratulate you and your department on the excellent job and you can be assured of my fullest cooperation.

I shall be away for a week to ten days and upon my return I shall submit to you and your department certain proposals and information which should be considered when making final plans to make the trails available for ski touring.

The geographic location of the trails assures under normal winter conditions of three to four months of snow. In your future plans, one should take into consideration that ski touring is the fastest growing ski sport in the United States and all indications point to a further continued growth in the coming years. Furthermore, the description of the trails in your presentation indicate grading that will permit novices which is a large number of ski tourers, to use the trails.

SKI TOURING COUNCIL

RUDOLF F. MATTESICH, *President*

WEST HILL ROAD
TROY, VERMONT 05668
802-744-2472

We do not know how many ski tourers there are right now in the United States. The only definite indications are the import figures of touring skis during the past few years which we have.

There are many stores who specialize only in hiking, backpacking, bicycling and ski touring equipment. For good reasons because the hiker, the backpacker, bicyclist and equestrian become ski tourers in the winter.

As I indicated in the opening of my letter, by the end of September, I shall mail you specific information on ski touring.

Sincerely yours,

Rudolf F. Mattesich
President

RFM:cdl

SKI TOURING COUNCIL

OFFICERS

RUDOLF F. MATTESICH, PRESIDENT & TREASURER
GEORGE FROELICH, VICE PRESIDENT
ALEXANDER W. BURKHARDT, SECRETARY

RUDOLF F. MATTESICH, *President*
WEST HILL ROAD
TROY, VERMONT 05868
802-744-2472

October 1, 1974

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Mr. John D. Cherry, Regional Director
United States Dept. of the Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Cherry:

In further reference to my letter of September 13th, I am pleased to give you further information on ski touring which I hope will be of help to you.

First of all I would like to give you the figures showing the tremendous growth of the sport. We don't know how many ski tourers there are. The only authentic figures we have are the import statistics of touring skis which are as follows -- during the years of 1967, 68 and 69 a total of 50,000 pairs of touring skis were imported, in 1970 alone - 50,000, in 1971 - 157,711 and in 1972 over 300,000 pairs were imported. In 1973, 311,000 touring skis were imported from Scandinavia alone, plus a considerable amount from Bavaria and other countries. Unlike the import of downhill skis which showed a dip of about 10% during 1973, touring skis imports increased about 10%.

The reason for this rapid growth are manifold. Ski touring can be enjoyed by anybody in reasonably good health, from 5 to 95. It can be practiced anywhere where there is snow as little as two inches. The equipment is most inexpensive, skis poles, bindings and boots now, can be purchased for as little as \$70. Regular hiking boots can be used cutting down that expense. The ski tourer needs no expensive fancy clothing. Regular jeans, a warm shirt, sweater and mittens is all he needs to enjoy this sport. Naturally for longer tours additional apparel and other equipment are recommended. Our Ski Touring Guide, the new edition which will be out in a few days, contains all the details. You will receive a copy as soon as it is off the press.

In regard to use of trails, I am attaching a galley-proof on ski touring trails which was furnished by Benjamin Hoffman, who is the Manager of State Land of the State of Vermont, and is considered an outstanding expert in this field. The information contained in the article should be of practical help to persons who will be engaged in making new trail systems available for ski touring. There is one more thing I would like to emphasize and that is ski touring trails cannot be used by snowmobiles. One or two snowmobiles would be of help flattening the trails. A frequent use of snowmobiles

SKI TOURING COUNCIL

OFFICERS

RUDOLF F. MATTESICH, PRESIDENT & TREASURER
GEORGE FROELICH, VICE PRESIDENT
ALEXANDER W. BURKHARDT, SECRETARY

RUDOLF F. MATTESICH, *President*
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-2-

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will create bumps called "meguls" which are which are very difficult for ski teurers to negotiate. Worst of all, in the late winter when the days are warm and the nights are cold, the tracks of the snowmobiles create a "icy washboard", conditions which are extremely dangerous.

2

There is one more suggestion I would like to take into consideration and that is creating feeder trails from nearby cities and towns, permitting the ski teurer to take shorter day trips, from 5 - 10 miles, in such feeder trails it would permit dwellers of these communities to take a day's outing. If possible, the feeder trail should be arranged in the form of a loop

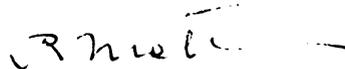
incorporating the main trail.

If you wish to reprint this article you can do so. All we want is to give credit to the Ski Teuring Council.

The new edition of the Ski Teuring Guide also contains additional information on safety measures, revival, etc.

If you feel that I can be of any further help please let me know, I would be delighted to do so.

Very truly yours,



Rudolf F. Mattesich
President

RFM:cdl
encls.

Letter dated October 1, 1974, from the Ski Touring Council

1. The updated figures on ski-touring have been incorporated into the environmental impact statement and the Secretary's report.
2. More information concerning the use of snowmobiles has been added.

November 18, 1974

1903 Eastlawn Apt. 11B
Midland, Michigan 48640

Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Sirs:

I have read the Draft Environmental Statement on the North Country Trail and ask that my comments be entered in the record. First, a brief recap of my backpacking experiences on the Shore-to-Shore Riding Hiking (and because of blatant violation motorcycle) Trail. Over the period spring 1971 to spring 1973 I hiked the entire trail. There were signs clearly stating that the trail was off limits to motorized vehicles from May to October. These were ignored by motorcycle riders. West of Mio six bikers tore a large gully trying to negotiate a hill that was too steep for their machines. They had to push them up after the bikes kept stalling. This was July 4 weekend 1971.

The next two years were little different from the first. Litter, erosion, and stream siltation (the case I saw was the south branch Au Sable River) were evident where ever bikes went. In comparison those areas where motorcycles had not been were cleaner with no erosion.

Second, an analysis of the DES. On p. iv it states "...allow Secretary of the Interior to designate scenic and recreational areas of the Trail." Yet on p. 3 it indicates that Congressional approval for the Trail concept and the NEPA considerations are necessary before the Secretary of the Interior has the assumed authority on p. iv. On p. 3 "Use creates the possibility of vandalism and littering". I know of no horse riders-especially those I met on the trail (Shore-to Shore) who littered and I doubt they vandalized their own trail camps. Only where ^{access} by motorized vehicles was litter in quantity noticed. This is not to say hikers and horse riders are absolutely guiltless but the magnitude of the problem is far smaller.

Proposal p. 1. How will the BOR so design a trail to prevent "recreational" sections from overlapping "scenic" sections with the gradual crowding out of the "scenic" section users by vehicles? Maintaining a chopped up trail is not the way to obtain committment from groups to do the work when the "scenic" section of committment is surrounded by "recreational" sections. The North Country Trail (referred to hereafter as the NCT) is not needed in Michigan to supplement currently available snowmobile areas and other ORV users as there is a large percentage of state land they may use. | 1

Control Devices p. 9. This is related to the Proposal above. The Michigan DNR has admitted ORV "passive controls" such as signs an absolute failure. Numerous articles in the "North Woods Call" document this statement. Where are the devices that the BOR proposes to use to control ORV's? I doubt they have been invented and wire cutters, chainsaws, etc. do an effective job of removing "control devices". | 2

Proposal p. 3 Section 2. "It should be designed for hiking and other compatible non-motorized uses in a manner that would protect the natural qualities of the environment.".... However, in the next paragraph ... an element of flexibility seemed desirable." Seemed desirable to whom? Where in the law creating the National Trails System does this flexibility direct that the Secretary of the Interior act as interpreter of PL 90-543? Further, the BOR considers that the only motorized use of the "recreational" sections would be by snowmobiles. The BOR certainly must have suffered a spasm of myopia to believe this would in actuality happen.

3

Trail Alignments- p.4 "... Areas which would be subject to damage from trail use should be avoided." Obviously, this must eliminate snowmobiles and other ORV's. The snow compaction from snowmobiles means the trail would be water logged for a longer period in the spring. Any use by hikers, horses and certainly by any other ORV's would subject the trail to damage. Hikers and horses try to avoid the mud. Trail bikers seem to relish it trying to see who can go through it the fastest.

4

General Standards for Trail Construction p. 7 .."On the trail segments designated as recreational snowmobiling may be permitted where compatible with other trail uses."... Please specify in the final draft what other trail uses are compatible with snowmobiling. I snowshoe and cross-country ski and they are definitely not compatible with snowmobiles.

5

Satisfying Recreation Needs p. 16 ... "Hiking demand...walking for pleasure.. ... for a total of 273.6 million visits per year." Why with this much use by foot power would any ORV's be allowed?

I recommend the adoption of Alternative 5 p.84 Establish a North Country National Scenic Trail. In the words concluding this section "Scenic trail status would provide for the highest quality recreational experience and emphasize scenic areas and remoteness." This is sorely needed in the urban areas through which the trail would pass.

6

Sincerely,
Scott M. Bailey
Scott M. Bailey

Letter dated November 18, 1974, from Scott M. Bailey

Most of this letter contains the author's opinion of the proposal, not a review of the environmental impact statement.

1. The Bureau of Outdoor Recreation is not designing the trail tread. The standards listed in the environmental impact statement are to be used as guidelines when the trail administrator constructs a trail segment.
2. Stiles, fences, and cables have been utilized as control devices. Education of the trail user remains the best method of ensuring proper use of the trail.
3. See response No. 2 to the Ohio Department of Natural Resources.
4. This reference applies to especially fragile areas such as bogs and alpine meadows. Each kind of trail use will have impacts. Normal wear can be mitigated by proper standards and management techniques.
5. Compatibility depends on the amount of use. The draft environmental impact statement acknowledged conflicts between snowmobiles and other winter uses. Additional discussion of these conflicts has been added to the final environmental impact statement. The Secretary's report recommends that snowmobiling not be permitted when there is substantial non-vehicular winter use of the trail. Alternate trails is one solution when demand for both foot use and snowmobile use is high.
6. The preference for the alternative of a North Country National Scenic Trail is noted.

2019 Beverly Road
Columbus, Ohio 43221
September 9, 1974

Mr. Frederick J. Bender
Acting Regional Director
Lake Central Region
Bureau of Outdoor Recreation
U S Department of Interior
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Bender:

Thank you for inviting the Buckeye Trail Association to comment on the draft environmental impact statement for the proposed North Country Trail. I'll start the statement circulating among our board members and officers so that each may have an opportunity to comment within the period, beginning with the Association's executive director, Robert R. Paton, 1947 Snouffer Road, Worthington, Ohio 43085, and the BTA president, Donald L. Vogt, 1141 Janis Avenue, Akron, Ohio 44314.

Although the BTA board of directors is on record in supporting the North Country project itself, we have not discussed the environmental impact statement together. Accordingly, the following views are my own personal observations and do not necessarily reflect the board's.

Page 72, section III A - Impact on Vegetation: Trail users often deplete the supply of firewood, fallen logs, decaying vegetation, and other soil-building materials near campsite and shelter areas. This effect can be minimized through user education and trail management, by encouraging or requiring the use of portable stoves and fuel. The probability of forest fires resulting from trail use and abuse is quite rare, much lower than the threat of fires resulting from highways or railroads. 1

Page 75, section III H - Impact on Land Use: The trail project will encourage the use of adjoining property for recreation and related purposes, such as parks, campsites, youth camps, riding stables, and vacation home sites. The trail will increase the value of adjoining land for such uses. See the enclosed clipping for proof. 2

Page 83, section VIII A 2 - Other Corridors: Corridor selection criteria were designed to identify the most scenic route. The proposed route ties in planned public park, forest, reservoir, and scenic river land acquisition projects wherever possible, thereby reducing the amount of land needed for right-of-way. Other corridors would provide less recreation benefit and lower quality recreation experiences, and would be more costly and less compatible with adjoining land uses. 3

Page 85, section VIII B - Administration: A third alternative for administration, mentioned earlier in the text, does not appear where it should. This is probably just an oversight. 4

I hope these comments will be of help.

Sincerely yours,


John P. Bay, member
BTA Board of Directors

Letter dated September 9, 1974, from John P. Bay

1. These points have been incorporated into the final environmental impact statement.
2. The attraction of the trail for recreation-related development was mentioned under J. Impact on Local Economy. While this may have positive economic benefits, such development may not be desirable from the viewpoint of the trail user, and the development itself can have adverse impacts on the environment. More discussion of secondary impacts has been added to this section. (The clipping to which Mr. Bay referred was from the classified section of the Columbus Dispatch showing recreational real estate for sale.)
3. This alternative has been revised.
4. There are only two alternatives for administration. The number "three" was the oversight.

November 2, 1974

Regional Director, Bureau of Outdoor Recreation
Lake Central Regional Office
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Sir:

We are writing to comment on the Draft Environmental Statement for the proposed North Country Trail. With one exception, we feel that the trail plan is a good one and hope that it will be speedily implemented. However, we are opposed to the idea of allowing snowmobiles on any part of the National Trail. That is, we support the alternative of designating a North Country National Scenic Trail.

There are several reasons for this.

1. We feel that the role of a National Trail should be to provide facilities which are not otherwise available. In the Pittsburgh area, at least, and we suspect in other areas as well, there is no shortage of snowmobile trails. However, there is a shortage of trails where people can snowshoe, ski-tour, or winter hike and botanize in the absence of snowmobiles. Most land managing agencies seem to make the assumption that snowmobilers are the only users of the winter woods; this is simply not true. | 1
2. The portions of the trail devoted to snowmobile use will be single use parts. On page 74 of the Draft Environmental Statement it is stated that trailbike and ATV use will not be allowed because they are preemptive, with the implication that snowmobile use is not. Winter motorized use is every bit as preemptive as summer motorized use. We know no one who is willing to risk injuries, or even death, hiking or skiing where snowmobiles might be present. | 2
3. The snowmobile trails will be an open invitation to trailbike use in summer. It seems obvious to us that this is true. A fifteen foot swath seems to be just what motorcyclists want. It will be difficult to devise barriers which keep motorcycles out, but do not impede snowmobiles. Thus, unless the managing agency is willing to erect barriers each spring and take them down each winter, the choice seems to be to allow both snowmobiles and other types of ORVs or neither. | 3
4. Snowmobile trails will be undesirable to hikers entirely apart from the fact that they will be used by trailbikes. In much of the region traversed by the proposed North Country Trail, we have very hot summers. It is pleasant to escape to the cool of the woods; it is very unpleasant to hike on a wide swath in the sun. Why construct a National Trail which will be little different from a pipeline or powerline swath? | 4
5. Allowing snowmobile use will make it more difficult to obtain permission from landowners to allow the trail across their property. For many | 5

years, the Appalachian Trail had a good relationship with private landowners. Hikers crossed their property, but quietly and with little damage. With the advent of ORVs, however, the noise and damage has increased, and the Appalachian Trail has had to leave private property in many places. This situation is not helped by the tendency of ORV users to leave established trails and roam.

When final decisions are made, we hope that you will agree with the majority of people who attended the public hearings and close the entire trail to all motorized vehicles. No reasons are given in the Draft Environmental Statement for the decision to allow snowmobiles and therefore we can only conclude that the decisions were entirely arbitrary. Since there are many good reasons given in the Statement for a connected National Scenic Trail, we urge you to adopt this alternative.

Sincerely,

Anne and Alan Hausrath

Mr. and Mrs. Alan Hausrath

Letter dated November 2, 1974, from Mr. and Mrs. Alan Hausrath

The preference for the alternative of designating a North Country National Scenic Trail is noted.

1. The need for different types of trails should be determined by the individual States.
2. Section III. Impact on Recreation, states that the use of snowmobiles could conflict with other winter uses. The Secretary's report recommends that snowmobiling not be permitted when there is significant use by cross-country skiers, snowshoers, and hikers. Alternate trails should be provided where demand for both snowmobile and nonmotorized use is high. This language, appearing in the report, has been emphasized in the final environmental impact statement to avoid confusion.
3. Wisconsin recommends a standard of 12 feet for snowmobile trails. The report and environmental impact statement have been changed to reflect this standard. At this time we have no evidence that snowmobile trails would be any more used by motorcycles in the summer than foot trails, equestrian trails, or bicycle trails. All trails require management to ensure that they are not misused.
4. Even on a 12-foot wide trail shade can be provided by overhanging trees. On some existing trails brush is removed, and the trail may even be mowed in order to provide the hiker some relief from the hordes of insects which accompany the hot summers. Trails utilizing abandoned railroad rights-of-way are six to eight feet wide. Such trails are surfaced with asphalt or limestone fines and often open to snowmobiles in the winter, with bicyclists and hikers sharing the trail in other seasons.
5. Landowner agreements could have an effect on whether a trail section was designated "scenic" or "recreational."

See page 74 of the draft environmental impact statement for the reason to have trail sections designated "recreational," i.e., to introduce some flexibility in areas capable of sustaining snowmobile use.



UNIVERSITY OF MINNESOTA
TWIN CITIES

College of Forestry
110 Green Hall
St. Paul, Minnesota 55108

10 October 1974

Mr. Frederick J. Bender, Acting Regional Director
U. S. Department of Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Bender:

Would you please send me a copy of the draft environmental impact statement on the proposed North Country Trail.

Also, I will submit at this time a brief comment. I am extremely disappointed to hear that the use of snowmobiles is being considered for this trail. It is rather ironical that here in Minnesota where ski touring is already suffering from gross inequities in terms of available areas and trails that we should consider taking what they do have.

Although the snowmobiling interests are obviously still very powerful and programs instigated during the rapid growth period of the sport have not lost their momentum, there is considerable evidence that snowmobiling is decreasing rapidly in popularity and predicted rates of participation will never be realized. In Minnesota the number of registered machines has actually decreased.

In the meantime ski touring participation has been doubling every year and should soon surpass snowmobiling in numbers. Needless to say the number of opportunities has not kept pace, and in fact has decreased due to the pre-emption of trails and trail routes by the snowmobile. It is very difficult to enforce a snowmobile ban on the few existing ski touring trails. If an exception is made to the motor vehicle ban on the North Country Scenic Trail it would only add to the confusion and ambiguity and make enforcement that much more difficult.

Please include this statement among the testimony on the Environmental Impact Statement for the proposed North Country Trail.

Sincerely,

Timothy B. Knopp
Assistant Professor

Letter of October 10, 1974, from Timothy B. Knopp

Dr. Knopp's letter is not a review of the draft environmental impact statement. It is included at his request.



GLEN HELEN

RALPH E. RAMEY
Director

Glen Helen, Antioch College,
Yellow Springs, Ohio 45387
513/767-7331

September 27, 1974

Mr. John D. Cherry, Director
Lake Central Region
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, MI 48104

Dear Mr. Cherry,

I have reviewed the draft environmental statement for the proposed North Country Trail (INT DES 74-84) and submit the following comments for your consideration.

The report and the EIS both appear to be very professional documents reflecting, in general, thorough investigation of the proposed trail corridor and the management alternatives.

In the second paragraph on page 15 in the section dealing with connecting and side trails, there is no mention of present or potential side trails in Ohio. The Buckeye Trail would connect from Zoar to both downtown Cleveland and Lake Erie at Headlands Beach State Park in eastern Ohio. It would also connect the NCT with the Air Force Museum at Fairborn in western Ohio and with the Lake Erie Marsh area including Magee Marsh Wildlife Area, the Ottawa National Wildlife Refuge and Crane Creek State Park in the north. Potential side trails exist in many areas but two outstanding ones are up Ohio Brush Creek in Adams County to the several natural areas in the vicinity of Lynx Prairie on the edge of Appalachia administered by the Cincinnati Museum of Natural History, and up Massies Creek to the Wilberforce and Central State Universities campus in Greene County.

1

On page 17 in paragraph M dealing with Interrelationships with other plans and developments, I see no mention of the Cesar's Creek Reservoir project in Greene and Warren Counties nor the east fork of the Little Miami Project in Clermont County. Both are authorized Army Corps of Engineers projects in various stages of construction and are within or very close to the proposed NCT corridor.

2

There is also no mention of coordination with the state-wide trail plan presently being prepared by the Ohio Department of Natural resources as required prior to January 1, 1975 by ASB 247 that became law on August 1, 1972.

3

In the third paragraph of section H-I on page 34, more correctly Clifton Gorge State Nature Preserve is a part of John Bryan State Park. It, as well as 250 acres of Antioch College's Glen Helen are Registered Natural Landmarks.

4

A LIVING MEMORIAL OF ONE THOUSAND ACRES FOR OUTDOOR APPRECIATION, EDUCATION, AND RESEARCH

Section I-J on page 35 contains considerable inaccurate information. The fourth line of the first paragraph would be more correct if it read "mid 1800's" rather than early 1800's since the Miami Extension of the Miami Erie Canal (the part north of Dayton that would be used for the NCT) saw its first boat passage on July 4, 1837 and was not open for through traffic to Lake Erie until 1844.

"About 130 years ago" rather than 75 would be closer to correct in the fourth line of the third paragraph since Loramie Summit (Lake Loramie) was constructed in 1843-44 and Mercer County Reservoir (Grand Lake St. Mary's) in 1837.

In the first line of the fourth paragraph, the Maumee River was hardly the southern boundary of the Great Black Swamp but rather the main artery through the center of the area. This can be plainly seen on the Ohio Geological Survey's map of Physiographic Sections of Ohio and the Ohio Biological Survey's map of Original Vegetation of Ohio.

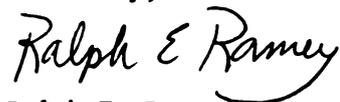
In line six, paragraph two on page 37, Goll Woods should be identified as a State Nature Preserve and a Registered Natural Landmark.

Perhaps some mention should be made of the need to negotiate with highway departments regarding provision by them of pedestrian overpasses or tunnels when they build new or rebuild old highways that intersect with the trail.

On the basis of my own experience, I believe camping sites in rugged areas such as in New York, Pennsylvania and southern Ohio should be about 6 miles apart with greater spacing, perhaps 10 miles, in near level country.

If there is anything I can do to hasten the process of adoption and implementation of the recommendations that the North Country Trail be established and that it be administered by a North Country Trail Conference, please let me know.

Sincerely,



Ralph E. Ramey

Letter dated September 27, 1974, from Ralph E. Ramey, Director, Glen Helen, Antioch College

1. The side and connecting trails listed on pages 14-16 are potential trails of major portent. The possibilities of utilizing portions of the existing Buckeye Trail as part of the North Country Trail as well as for connecting trails has been discussed in the section II. Possible Route Location, Ohio.
2. Caesar's Creek and East Fork Reservoirs are under construction. The corridor was routed to avoid conflicts with these projects. It is conceivable that public recreation land acquired as part of these projects could be used for trail and/or trail facilities location.
3. Information on Clifton Gorge and Glen Helen has been added to the text.
4. While the trail plan required by ASB 247 was not mentioned specifically, trail planning is an element in the Ohio SCORP. Reference to the State trail plan has been added to the final environmental impact statement.
5. The inaccuracies have been corrected and the information on Goll Woods added to the text.
6. The spacing on camping sites is an overall estimate for the whole trail. Actual spacing, location, and size would be determined by the administering agency.

59 Trail Creek
Pocatello, ID 83201
November 13, 1974

Mr. Richard D. Rieke
Assistant Regional Director
U.S. Department of the Interior
Bureau of Outdoor Recreation
3853 Research Park Drive
Ann Arbor, Michigan 48104

Dear Mr. Rieke:

I have studied the draft environmental impact statement for the proposed North Country Trail. The trail passes near and through an area that I was reared as a boy and am familiar with today, the Ludington-Manistee region of "lower" Michigan. I have a few comments about the draft that you may want to consider for the final environmental impact statement.

In general, the concept of a continuous overland trail has merit especially with the growing interest of back packing in the U.S. today. It was stated in the draft under Criteria for National Senic Trail Designation (page 3), that the trail "should be designed for hiking and other compatable non-motorized uses in a manner that would protect the natural qualities of the trails' environment." Where flexibility may be desirable to a few, the allowed use of snowmobiles on the proposed trail seems to be anti-thetical to the concept of "non-motorized uses that would protect the natural qualities of the trails' environment." (P. 3). Snowmobiles should be restricted. It is weakly suggested that motor bikes and ATV's will be restricted from the trail because they will conflict with the hikers, both having a congruent season. No mention was made concerning the conflict of cross-county skiers and snow machines. They too, have like seasons and would be in competition for the use of the trail. Although there have been many critiques written about the ecological effects of the snowmobile, I feel that an article published in the Yale Law Journal, Vol. 82, November 4, March 1973 summarizes the critiques and my sentiments about allowing snowmobiles on the North Country Trail.

From--Snowmobile and the Environment, Yale Law Journal p. 773.

Snowmobiling has direct and indirect environmental effects. Aside from use to deliberately harrass animals and to destroy property, the machines injure vegetation and wildlife because of their unavoidable disturbance and noise. The industry loudly proclaims that the vehicles exert a surface pressure only one tenth that of man, but their extreme speed and mobility multiply snowmobiles' damage. Snowmobile tracks increase the density and thus lower the insulative qualities of snow, impeding the movements of small animals beneath and lowering the temperature at ground level, with unpredictable results to crops, birds, and animals.

Industry spokesmen stress that snowmobiles are used in the season "when the prospects for permanent change in the eco-system are most remote." But winter is precisely the time of year when plants and wildlife are most vulnerable. Breeding deer are weak and easily frightened; seedlings are brittle and dry. Given the complex interrelationships of an eco-system, a change at one level of the food-chain may create an imbalance throughout, with unforeseeable effects. Moreover, the increased mobility bestowed by snowmobiles often opens previously inaccessible wilderness areas to large numbers of persons, sometimes causing over-hunting or over-fishing. The mere presence of snowmobiles in high concentrations may cause animals to migrate from an area.

Finally, compared with other outdoor activities such as hiking or fishing, snowmobiling has a particularly high cost in terms of both aesthetics and annoyance: While a square mile may support a score of these other users all blissfully unaware of each others presence, a single noisy snowmobile can disrupt the enjoyment of them all, though its operator may be well-intentioned and indeed may not even know that others are in the area.

Cross country skiing is becoming a recognized sport in the United States. Numerous publications have recognized the trend. An example of the tremendous growth in ski touring is taken from the article "The Sophisticated Stride" published in Ski Magazine as far back as 1972. 3

"Last year, more than 156,000 pairs of touring skis entered the country--representing a five fold increase over just two years--as most major ski firms took on touring lines. The result: lower costs, lower prices.

As prices have plummeted, the selection has gone up. This season, 39 brand of skis, 35 brand of boots, 28 brands of poles, 25 brands of bindings and 15 brands of wax are being sold through U.S. ski shops."

This shows a tremendous growth in cross country skiing and a growth that must be considered when recommending the trail be open to snowmobiles.

Page 4, part B, Trail Alignment is of interest to me. A conceptual 10 mile wide corridor is used to describe the trail route. It is stated that this approach is more feasible rather than attempting to locate a trail tread. Reasons were given to justify the "corridor approach." I feel the corridor approach weakens the whole draft EIS. One thing that should be accomplished by an EIS. is a determination of environmental effects of the proposed project. In the area of Michigan that I am familiar with, the Topographical and Environmental conditions can vary tremendously in a 2 mile corridor, let alone a ten mile width. Streams and the like may be crossed or avoided 4

Mr. Rieke
November 13, 1974
Page 3

in this distance. As late as 1956 a complete topographic survey of Michigan had not been completed. (from, An Index of Michigan Geology, Martin and Straight, Michigan Geological Survey, pp. 246-250) Further study of Michigan geology will make evident the diverse changes in topography in short distances, that greatly effect watershed and soil surfaces. Other states are in a similar circumstance. A ten mile corridor approach is hardly precise enough to allow sufficient or informal environmental comments. I feel the E.I.S. must be more specific to allow for scrutinization of specific environmental problems and situations.

Some questions remain unanswered in my mind concerning (L.), Impact Related to Visitor Use. Human waste is recognized as a potential problem. I assume that toilet facilities would be provided. No mention is made as to the interval of toilet facilities. If toilet facilities are provided, the E.I.S. should consider their effect on the ground water in the area. Litter is also recognized as a potential problem. If trash cans are provided, how will they be emptied? Will there be maintenance roads running parallel to the trail? If so their impact must also be measured. The litter problem would be great if snowmobiles are allowed to traverse the trail. Soda cans and paper is covered by ensuing snow fall, thus "out of sight, out of mind."

Last but not least, I see tremendous problems, aesthetically and ecologically, if snowmobiles are allowed to use the trail. Their use would encourage motorcycle use and may even prompt legal action by some motorcycle groups for equal treatment. The biggest problem I see in the future if the proposed trail is completed is the restriction of mechanized recreational equipment. I see no way to retain the ecological and aesthetic attributes of the trail unless strict enforcement measures are taken to keep motor bikes from the trail. No mention is made of this problem in the draft, with the exception of passing it off as a minimal abuse problem. The presence of snowmobiles the expenditure of funds for clearing overhead for snowmobile use, and the departmental attitude of facilitating snowmobile use will only open a Pandora's Box. Inaccessible areas of wild life will surely be opened, as is stated by the draft E.I.S. I wonder, what will stop the use of the trail as a route for "motorized" hunters and fisherman? Shouldn't the impact of possible snowmobile and motorcycle intrusion into big game wintering or water fowl nesting areas be further commented upon?

Sincerely,



Carl R. Seelhoff

jb

Letter dated November 13, 1974, from Carl R. Seelhoff

1. The draft environmental impact statement, page 74, states that use of snowmobiles could conflict with other winter uses of the trail. More discussion of this has been added to the final environmental impact statement.
2. The impacts cited in the Yale Law Journal apparently apply to off-trail use of snowmobiles. By providing trails for snowmobile use, off-trail use may be reduced.
3. Up-to-date information on ski-touring, supplied by the Ski Touring Council, has been incorporated into the final environmental impact statement.
4. Specific environmental impact statements at the route selection stage is a possibility. By law, the right-of-way selection must be published in the Federal Register. The public will have an additional opportunity to comment at that time. See Section I.A.3. "Compliance with NEPA."
5. Impacts related to visitor use have been discussed in the Impact Section, specifically in sections C. Impact on Air and Water Quality, G. Impact on Recreation, and L. Impacts Related to Visitor Use.
6. The draft environmental impact statement specifically states that motorcycles and motorbikes should be prohibited. That accidental or deliberate use of the trail by bikers is acknowledged, not passed off as a minimal abuse problem. Many existing trails--particularly ones on railroad right-of-way--are open to snowmobiles in the winter but are not open to motorized use at any other time. Education and enforcement of the regulations are the primary tools for handling the abuse caused by all types of users.

Tennessee Gas Pipeline
Division of Tenneco Inc

Tenneco Building
P. O. Box 2511
Houston, Texas 77001
(713) 229-2131



October 7, 1974

U.S. Department of Interior
Bureau of Outdoor Recreation
Lake Central Region
3853 Research Park Drive
Ann Arbor, Michigan 48104

Gentlemen:

Thank you for providing the copy of the Draft Environmental Report for the Proposed North Country Trail.

It shows that this trail will cross our existing natural gas pipeline systems at eight places, so to assist our mutual interests, please inform me of the public hearings concerning this proposal.

Thank you.

Yours very truly,

TENNESSEE GAS PIPELINE COMPANY
Division of Tenneco Inc.

A handwritten signature in black ink that reads "B. J. Whitley, Jr." in a cursive style.

B. J. Whitley, Jr.
Environmental Coordinator

BJW:amd

cc: Mr. H. E. Long
Mr. R. A. Smith
Mr. W. Such
Dr. C. E. Westell

Letter dated October 7, 1974, from the Tennessee Gas Pipeline Company

1. Reference to gas pipelines has been added to the final environmental impact statement. Public hearings on the proposal were held in June of 1973. Right-of-way selection must be published in the Federal Register, at which time the public may comment.

HARRY E. WILSON SKI
POLARIS MATERIAL OFFICE
NAVAL BASE
CHARLESTON, SOUTH CAROLINA 29408

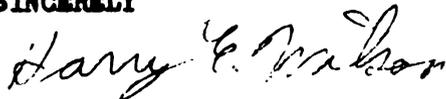
REGIONAL DIRECTOR
LAKE CENTRAL REGION
BUREAU OF OUTDOOR RECREATION
3853 RESEARCH PARK DRIVE
ANN ARBOR, MICHIGAN 48104

DEAR SIR

I AGREE WITH THE DRAFT ENVIRONMENTAL STATEMENT--
PROPOSED NORTH COUNTRY TRAIL, INT DES 74-84 AS
PROPOSED.

NOTHING IS STATED IN THE STATEMENT AS TO HOW CLOSE
COMMERICAL ESTABLISHMENTS WILL ALLOWED TO THE PROPOSED
NORTH COUNTRY TRAIL IF ESTABLISHED, NEW ESTABLISHMENTS
ONLY, AS OLD ESTABLISHED ONES WOULD BE MISSED BY
THE TRAIL ROUTING.

SINCERELY



HARRY E. WILSON SKI
POLARIS MATERIAL OFFICE
NAVAL BASE
CHARLESTON, SOUTH CAROLINA 29408

Letter from Harry E. Wilson, Polaris Material Office

1. The proximity of new commercial establishments would depend on the amount of buffer area acquired. An average buffer of 200 feet is recommended. Acquisition of scenic easements is also recommended.

APPENDIX A
Agencies and Organizations Contributing
to the North Country Trail Study

State Agencies

Vermont

Agency of Environmental Conservation
Department of Highways

New York

Office of Parks and Recreation
Department of Environmental Conservation
Department of Transportation

Pennsylvania

Department of Environmental Resources
Department of Transportation

Ohio

Department of Natural Resources

Michigan

Department of Natural Resources
Department of State Highways

Wisconsin

Department of Natural Resources
Department of Transportation

Minnesota

Department of Natural Resources
Minnesota Resources Commission
Department of Highways
University of Minnesota

North Dakota

Outdoor Recreation Agency
Game and Fish Department
Water Commission
Forest Service
Soil Conservation Committee
Historical Society
Highway Department
Park Service
Planning Office

Federal Agencies

Department of Agriculture
Forest Service
Department of the Army
Corps of Engineers
Department of the Interior
Bureau of Indian Affairs
Bureau of Outdoor Recreation
Bureau of Reclamation
Fish and Wildlife Service
National Park Service
Department of Transportation
Federal Highway Administration

Private Organizations

Adirondack Mountain Club
American Youth Hostels
Buckeye Trail Association
Butler County Trails Committee
Finger Lakes Trail Conference
Green Mountain Club
Keystone Trails Association
New York-New Jersey Trail Conference
Susquehannock Trail Club

APPENDIX B

VISITATION METHODOLOGY

Ref: The 1965 Survey of Outdoor Recreation Activities BOR (1967)
and Outdoor Recreation Resource Review Commission Report #19

Population within one-hour zone (50 miles) 1970 census	23 million
Population within two-hour zone (100 miles)	47 million

DEMAND

	<u>Walking for Pleasure</u>	<u>Hiking</u>
Percent of population participating (U.S. average)	48	7
Number of times per summer season (activity performed) (U.S. average)	15.2	5.1
Factor of annual use/summer use (North Central Census Division)	4.15	1.62
Number of times per year	63.08	8.26
Annual potential participation (1970 census)	232.1 million	27.2 million
Annual potential participation 2000 (estimated 37 percent increase, U.S. Bureau of Census, Series D, 1971)	318 million	37.3 million

Procedure

Walking for Pleasure: $15.2 \times 4.15 = 63.08 \times 48\%$ of 23 million = 696.4 million. Since a substantial amount of walking for pleasure occurs in places other than trails, one-third or 232.1 million activity occasions were allocated.

Hiking: $5.1 \times 1.62 = 8.26 \times 7\%$ of 47 million = 38.4 million activity occasions.

SUPPLY PROVIDED BY NORTH COUNTRY TRAIL AT DESIGN CAPACITY

	<u>W/in 50 miles of 100,000 population Center</u>	<u>Low Intensity</u>	<u>High Intensity</u>
Length of Trail (Miles)	900	1,256	1,090
Capacity/units/day	150 (primarily walking for pleasure)	20 (primarily hiking)	40 (primarily hiking)
No. of design days summer season	45	45	45
Total visits, summer	6,075,000	1,130,400	1,962,000
Total visits, annual			
150 assumed walkers x 4.39 annual conversion rate	26,669,250		
20/40 assumed hikers x 1.67 annual conversion rate		1,887,768	+ 3,276,540
		<u>5,164,308</u>	
Percent of 1970 demand satisfied	11%	19%	
Percent of 2000 demand satisfied	08%	14%	

APPENDIX C

SITES LISTED IN THE NATIONAL
REGISTER OF HISTORIC PLACES
(February 1975)

NEW YORK

Essex County

Adirondack Forest Preserve* (R)

Crown Point

Fort St. Frederic* (R)

Fort Crown Point (R)

Ironville

Ironville Historic District (C)

Hamilton County

Adirondack Forest Preserve* (R)

Herkimer County

Adirondack Forest Preserve* (R)

Oneida County

Booneville

Erwin Library and Pratt House(R)

Five Lock Combine and Locks 37 and 38,
Black River Canal (R)

Rome

Arsenal House (R)

Ft. Stanwix National Monument* (R)

Oriskany Battlefield* (C)

Madison County

Oneida

Oneida Community Maison House* (C)

Onondaga County

Manlius

Manlius Village Historic District (C)

Cortland County

Cortland

Cortland County Courthouse (C)

Cortland Fire Headquarters (C)

Homer

Old Homer Village Historic District (C)

Schuyler County

Watkins Glen

Schuyler County Courthouse Complex (R)

NEW YORK (continued)

Cattaraugus County

Ellicottville

Town Hall (C)

Salamanca

Zawatski Site (R)

PENNSYLVANIA

(NONE)

OHIO

Columbiana County

West Point vicinity

John H. Morgan Surrender Site (C)

Carroll County

Minerva

Minerva Grade School (R)

Tuscarawas County

Bolivar vicinity

Fort Laurens Site (C)

Zoar

Zoar Historic District (R)

Washington County

Marietta

Erwin Hall, Marietta College (C)

Morgan County

Stockport vicinity

Big Bottom (R)

Hocking County

Haydenville

Haydenville Historic Town (C)

Pike County

Morgantown vicinity

Eager Inn (R)

Scioto County

Otway vicinity

Otway Covered Bridge (R)

Adams County

Manchester vicinity

Buckeye Station (C)

Wrightsville vicinity

Dayton Power and Light Company Mound (C)

OHIO (continued)

Brown County

Aberdeen vicinity	Aberdeen Mound (C)
Ripley vicinity	John Rankin House (R)

Clermont County

Bantam vicinity	Pinkham Farm (C)
Milford vicinity	Gatch Site (C)
Nerville	Edington Mound (C) Ferris Site (C) Schafer House (C) Snead Mound (C)
Perintown vicinity	Stonelick Covered Bridge (R)
Point Pleasant vicinity	Clark Farm Site (R)

Warren County

Harveysburg vicinity	Lukins-Plummer House (C)
Oregonia vicinity	Bone Mound II (R) Bone Stone Graves (R)

Greene County

Clifton vicinity	Benjamin Whiteman House (C)
Wilberforce	Homewood Cottage (C) President's House, Central State University (C) Colonel Charles Young House* (C) Bank of Xenia (C) E. Second Street District (C)
Yellow Springs vicinity	Orator's Mound (C)

Clark County

Enon	Enon Mound (R)
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Miami County

Lockington and vicinity	Lockington Locks Historical Area (R)
Piqua	Fort Piqua Hotel (C)
Piqua vicinity	Piqua Historical Area State Memorial (R) (John Johnston Farm and Indian Agency

OHIO (continued)

Allen County

Spencerville vicinity Miami and Erie Canal, Deep Cut* (R)

MICHIGAN

Hillsdale County

Jonesville Grace Episcopal Church (R)

Calhoun County

Albion Gardner House (R)

Battle Creek Battle Creek Post Office (C)
Federal Center, Main Building (C)
Penn Central Railway Station (C)

Kent County

Ada Covered bridge (R)

Emmet County

Petoskey Chesapeake and Ohio Railway Station (C)
St. Francis Solanus Mission (C)

Petoskey vicinity Bay View (C)

Mackinaw City Fort Michilimackinac* (R)

Mackinac County

Gros Cap vicinity Gros Cap Cemetary (R)

St. Ignace Lasen Site (R)

Chippewa County

Naomikong Point Site (R)

Shelldrake vicinity Whitefish Point Lighthouse (R)

Alger County

Au Train vicinity Paulson House (C)

Christmas vicinity Bay Furnace (C)

Marquette County

Marquette Call House (C)

MICHIGAN (continued)

Gogebic County

Ironwood

Copper Peak (C)

WISCONSIN

Douglas County

Solon Springs vicinity

Brule-St. Croix Portage (R)

MINNESOTA

Carlton County

Duluth vicinity

Grand Portage of the St. Louis River (R)
(Jay Cooke State Park)

Aitkin County

McGregor vicinity

Savanna Portage (R)

Clearwater

Park Rapids vicinity

Itasca Bison Site (C)
Itasca State Park (R)

Otter Tail County

Fergus Falls vicinity

Orwell Site (C)

NORTH DAKOTA

Benson County

Fort Totten vicinity

Fort Totten (R)

* National Historic Landmark

(R) Located along or near possible trail route

(C) Located within five miles of possible trail route

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OR
MUTILATE CARD**

