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Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

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National Nuclear Security Administration
Los Alamos Site Office

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Acronyms and Terms

ac	acres
ADO	Associate Director of Operations
BMPs	best management practices
C&T EIS	Conveyance and Transfer EIS
cm	centimeter(s)
CEQ	Council on Environmental Quality
dB	decibels
dBA	A-weighted decibels
DOE	(U.S.) Department of Energy
DOI	Department of the Interior
EA	environmental assessment
EIS	environmental impact statement
EPA	(U.S.) Environmental Protection Agency
ER	Environmental Restoration (Project)
ESA	Endangered Species Act of 1973
FY	fiscal year
ha	hectares
HE	high explosives
in.	inches
IRMP	Integrated Natural and Cultural Resources Management Plan
JMVF	Jemez Mountains volcanic field
km	kilometers
km^2	square kilometers
LANL	Los Alamos National Laboratory
mi	miles
mi^2	square miles
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NERP	National Environmental Research Park
NHPA	National Historic Preservation Act
NMAAQS	New Mexico Ambient Air Quality Standards
NMED	New Mexico Environment Department
NNSA	National Nuclear Security Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PRSs	potential release sites
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
SHPO	State Historic Preservation Office(r)
SR	State Road
SWEIS	Site-Wide Environmental Impact Statement
SWPP	Storm Water Pollution Prevention (Plan)
TA	technical area
TCPs	traditional cultural properties
TLV	threshold limit value
U.S.	United States
yd^3	cubic yards

EXPONENTIAL NOTATION: Many values in the text and tables of this document are expressed in exponential notation. An exponent is the power to which the expression, or number, is raised. This form of notation is used to conserve space and to focus attention on comparisons of the order of magnitude of the numbers (see examples):

1×10^{4}	=	10,000
1×10^{2}	=	100
1×10^{0}	=	1
1×10^{-2}	=	0.01
1×10^{-4}	=	0.0001

Metric Conversions Used in this Document

Multiply	By	To Obtain
Length		
inch (in.)	2.50	centimeters (cm)
feet (ft)	0.30	meters (m)
yards (yd)	0.91	meters (m)
miles (mi)	1.61	kilometers (km)
Area		
acres (ac)	0.40	hectares (ha)
square feet (ft^2)	0.09	square meters (m^2)
square yards (yd^2)	0.84	square meters (m^2)
square miles (mi^2)	2.59	square kilometers (km^2)
Volume		
gallons (gal.)	3.79	liters (L)
cubic feet (ft^3)	0.03	cubic meters (m^3)
cubic yards (yd^3)	0.76	cubic meters (m^3)
Weight		
ounces (oz)	29.60	grams (g)
pounds (lb)	0.45	kilograms (kg)
short ton (ton)	0.91	metric ton (t)

Executive Summary

Los Alamos National Laboratory (LANL) workers, Los Alamos County residents, and visitors have all enjoyed using area trails since the earliest days of the Manhattan Project. Some recreational trails at LANL are culturally important to the neighboring Pueblos. Some LANL trails also link with trails on lands administered by other Federal agencies, the County of Los Alamos, and adjacent Pueblos. Lack of a trails policy at LANL has led to unsanctioned trails use, trespassing, and confusion regarding trails access at LANL. Some trails are listed as State cultural properties and may be eligible for National Register of Historic Places listing. Some trails traverse or are located near potential waste release sites. Some of the trails also cross the health, safety, and security buffer zones around research sites. Some trails traverse sensitive habitats for Federally listed threatened and endangered species.

At this time, the National Nuclear Security Administration (NNSA) must consider alternatives for trails management at LANL and make a decision regarding the implementation of a Trails Management Program at LANL. This programmatic environmental assessment (EA) provides decision makers and the public with an analysis of environmental impacts as required by the *National Environmental Policy Act of 1969* (NEPA). The U.S. Department of Energy (DOE) and NNSA must balance their Congressional mission requirements with other land use and stewardship considerations at LANL. The NNSA needs to determine the permissible public use of trails within LANL in order to facilitate the establishment of a safe, viable network of linked trails across the Pajarito Plateau that traverse land holdings of various private and government entities for recreational use and for alternate transportation purposes (such as riding bikes to and from residences and worksites). Additionally, in order to facilitate the appropriate use of trails by employees and officially invited guests at LANL, NNSA needs to determine the permissible use of trails within LANL for these users. The purpose of such action would be to provide acceptable access to trails within LANL where such use is desired and appropriate without posing a threat to DOE and NNSA mission support work at LANL or disrupting LANL operations. Public safety, operational security, and the protection of sensitive natural and cultural resources would be primary considerations in the establishment of such action at LANL.

The Proposed Action would consist of implementing a Trails Management Program at LANL to address LANL trails use by the public, LANL workers, and officially invited guests. A Trails Assessment Working Group would be established. Repair, construction, environmental protection, safety, and security measures would be formulated and implemented. End-state conditions and post-repair or post-construction assessments would be performed. The Proposed Action would have a minor effect on socioeconomics. This alternative would ideally foster a more balanced use of LANL trails while allowing some recreational use to continue. The establishment of a Trails Management Program would result in enhanced protection of cultural resources with minimal to negligible effects on the other LANL resources.

The Trails Closure Alternative would result in the closing of all existing trails to the public and LANL workers for recreational use purposes while allowing limited access by workers at LANL and officially invited guests. Similar to the Proposed Action Alternative the Trails Closure Alternative would have a minor effect on socioeconomics. There would be enhanced protection of cultural resources and minimal to negligible effects on the other LANL resources.

The No Action Alternative is presented to provide a baseline for comparative analysis as required by NEPA. Under the No Action Alternative, wildlife habitat degradation may slightly

increase but there would be no adverse effect. The possibility for damages to cultural resources would continue.

An overview of accident possibilities and probabilities associated with the three alternatives is also presented in this EA. Trail construction and use are relatively low-risk activities. Accident frequencies under the Trails Closure Alternative would be reduced compared to the Proposed Action, while the No-Action Alternative presents the highest accident risks.

Evaluation of cumulative effects for the three alternatives indicates that there would likely be only minimal and slight cumulative effects on affected resources as a consequence of the aggregate of the Proposed Action and past, present, and reasonably foreseeable future actions; and some positive cumulative effects to ecological and cultural resources as a consequence of the Proposed Action or the Trails Closure Alternative. The No Action Alternative could pose slightly negative cumulative effects to cultural and ecological resources and to environmental justice concerns. In conclusion, the effects of the Proposed Action, when combined with those effects of other actions would not result in cumulatively significant impacts.

Two alternatives were considered but dismissed: opening all existing trails at LANL to the public for unrestricted use would not be consistent with NNSA's primary mission; while reviewing individual trails in this EA to make specific recommendations for repair or closure was not considered to be as effective as the proposed Trails Management Plan.

1.0 Purpose and Need

Chapter 1 of this programmatic environmental assessment for a Trails Management Program presents the U.S. Department of Energy (DOE), National Nuclear Security Administration's (NNSA) requirements under the *National Environmental Policy Act of 1969* (NEPA), program objectives, background information on the proposal, relevant issues, the purpose and need for agency action, and a summary of public involvement activities.

1.1 Introduction

NEPA requires Federal agency officials to consider the environmental consequences of their proposed actions before decisions are made. In complying with NEPA, DOE and NNSA[1] follow the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508) and DOE's NEPA implementing procedures (10 CFR 1021). The purpose of an environmental assessment (EA) is to provide Federal decision makers with sufficient evidence and analysis to determine whether to prepare an environmental impact statement (EIS) or issue a Finding of No Significant Impact.

At this time, the NNSA must make a decision regarding the establishment of an on-going Trails Management program to address the continuing use of existing social trails[2] at Los Alamos National Laboratory (LANL). This EA is therefore programmatic in nature. This program would consider the maintenance and upkeep of existing trails; the development of new trails; the reclamation of closed trails; and other associated actions. LANL is a Federal facility located at Los Alamos, New Mexico, that comprises 40 square miles (mi^2) (104 square kilometers [km^2]) of buildings, structures, and forested land. LANL is administered by NNSA for the Federal government and managed and operated under contract by the University of California. This EA has been prepared to assess the potential environmental consequences of initiating a LANL Trails Management Program; closing all social trails to further recreational use; and the No Action Alternative.

The general objectives of this EA are to (1) describe the underlying purpose and need for DOE action; (2) describe the Proposed Action and identify and describe any reasonable alternatives that satisfy the purpose and need for agency action; (3) describe relevant baseline environmental conditions at LANL; (4) analyze the potential indirect, direct, and cumulative effects to the existing environment from implementation of the Proposed Action, and (5) compare the effects of the Proposed Action with the No Action Alternative and other reasonable alternatives. For the purposes of compliance with NEPA, reasonable alternatives are identified as being those that meet NNSA's purpose and need for action by virtue of timeliness, appropriate technology, and applicability to LANL. The EA process provides NNSA with environmental information that can be used in developing mitigation actions, if necessary, to minimize or avoid adverse effects to the quality of the human environment and natural ecosystems should NNSA decide to proceed

[1] The NNSA is a separately organized agency within the DOE established by the 1999 *National Nuclear Security Administration Act* (Title 32 of the *Defense Authorization Act* for fiscal year (FY) 00 [Public Law 106-65]).

[2] The terms "social trails," "trails," and "unimproved trails and roads" are used within this EA to indicate trail treads that have developed at LANL with or without official DOE or NNSA approval. Trails are used primarily by walkers, but some are also used by runners, bicyclists, equestrians, and off-road motorized vehicles. "Pathways," as used in this EA, indicate routes that are improved with paving material, such as asphalt, gravel, or cement and are part of the approved and officially sanctioned pedestrian network within LANL. Pathways may include sidewalks, jogging paths, and other routes designed or designated primarily for foot traffic.

with implementing the Proposed Action. The ultimate goal of NEPA, and this EA, is to aid NNSA officials in making decisions based on an understanding of environmental consequences and in taking actions that protect, restore, and enhance the environment.

1.2 Background

The U.S. National Security Policy requires the NNSA to maintain core intellectual and technical competencies in nuclear weapons and to maintain a safe, and reliable, national nuclear weapons stockpile. NNSA fulfills its national security nuclear weapons responsibilities, in part, through activities performed at LANL. LANL is one of three national security laboratories that support DOE and NNSA responsibilities for national security, energy resources, environmental quality, and science.

The NNSA's national security mission includes the safety and reliability of the nuclear weapons in the stockpile; maintenance of the nuclear weapons stockpile in accordance with executive directives; stemming the international spread of nuclear weapons materials and technologies; developing technical solutions to reduce the threat of weapons of mass destruction; and production of nuclear propulsion plants for the U.S. Navy. The energy resources mission of DOE includes research and development for energy efficiency, renewable energy, fossil energy, and nuclear energy. The DOE's environmental quality mission for the DOE includes treatment, storage, and disposal of DOE wastes; cleanup of nuclear weapons sites; pollution prevention; storage and disposal of civilian radioactive waste; and development of technologies to reduce risks and reduce cleanup costs for DOE activities. DOE's science mission includes fundamental research in physics, materials science, chemistry, nuclear medicine, basic energy sciences, computational sciences, environmental sciences, and biological sciences, and often contributes to the other three DOE missions. LANL provides support to each of these departmental missions, with a special focus on national security.

The assignments of Congressionally mandated mission support functions have changed over the past 60 years as LANL has evolved from the original Manhattan Project, Project "Y" facility established in early 1943. The mission for the Manhattan Project was to develop the world's first nuclear weapon in support of the Nation's defense during World War II. The U.S. Army Corps of Engineers was responsible for the Manhattan Project and for choosing locations to conduct the various Project activities. The criteria established for choosing the Manhattan Project, Project Y site were as follows: (1) the site had to have adequate housing for 30 scientists; (2) the site had to be owned by the government or easily acquired in secrecy; (3) the site had to be large enough and uninhabited enough so as to permit safe separation of sites for experiments; (4) access to the site had to be easily controlled for security and safety reasons; and (5) there had to be enough cleared land free of timber to locate the main buildings at once. The site chosen for Project Y was the Los Alamos Ranch School, which consisted of several buildings, including a main school building (now known locally as Fuller Lodge) and several cabins and outbuildings. The location of the Los Alamos Ranch School was on one of the Pajarito Plateau mesa tops (now known as the Los Alamos town site mesa) situated along the eastern flank of the Jemez Mountains in northern New Mexico.

The area surrounding the Los Alamos Ranch School has been used for centuries. It was first populated by ancestors of modern day Pueblo People (Ancestral Puebloans migrated from the Mesa Verde Region surrounding the Four Corners Region and the Chaco Region of western New Mexico) including the Pueblos of San Ildefonso and Cochiti. It was used later by Spanish and

Mexican settlers and scattered American homesteaders. The Los Alamos area was used in the late 1800s and early 1900s to graze herds of cattle and sheep and to grow hay and other crops. Historic wagon roads and single-lane trails, some of which are centuries old, traverse the mesas and canyons of the region. A single unpaved roadway suitable for use by automobiles accessing the Los Alamos Ranch School was present in early 1943 when the U.S. Army Corps of Engineers took over the site.

> "Throughout the Pajarito Plateau there is a network of…trails, often connecting villages or leading to farming areas. They were cut and worn into the rock by generations of ancestral Pueblo people, barefooted or in sandals, passing back and forth from their mesa-top homes to the fields and to springs in the canyons below." (From the Tsankawi Trail pamphlet produced by Southwest Parks and Monuments Association for Bandelier National Monument).

After the end of World War II, the Manhattan Project, Project Y facility was assigned continuing nuclear-related activities and is operated today primarily as a nuclear research and development laboratory known as LANL. Los Alamos County residents and visitors alike have accessed LANL area trails for decades since the first scientists and their support personnel and family members made use of the already existing trails and wagon roads for recreational purposes and to move on foot between laboratory areas at a time when vehicles were not always the fastest means of travel in the area. New social trails have been created along with new footpaths and roads to facilitate the foot traffic and vehicle traffic. Many trails that link areas of significance to Pueblo People continue to exist, have been maintained since pre-European contact, and remain culturally important to the neighboring Pueblos.

Today, 60 years after the creation of the Manhattan Project, Project Y facility from the Los Alamos Ranch School, there are numerous social trails, footpaths, and roads that range over the mesas and canyons that make up LANL, Los Alamos County, and other nearby lands owned or administered by various private land holders, Federal agencies, and the Pueblo of San Ildefonso. LANL adjoins lands currently under the administrative control of the (U.S. Department of Agriculture) Santa Fe National Forest, the (U.S. Department of the Interior) Bandelier National Monument, the Pueblo of San Ildefonso, Los Alamos County, and various county-owned and private lands in Los Alamos and Santa Fe Counties. Figure 1 shows LANL in relation to the surrounding region and neighboring jurisdictions.

Lands located within the Pajarito Plateau, including LANL, host a complicated web of natural and cultural resources. LANL has many areas of suitable habitat for Federally protected threatened and endangered species of plants and animals. Big game species (such as elk [*Cervus elaphus nelsoni*], mule deer [*Odocoileus hemionus*]), and their natural predators (such as black bears [*Ursus americanus*] and mountain lions [*Felis concolor*]) make their homes at least part of the year within LANL boundaries. The major canyons at LANL have been mapped for 100-year floodplains, and scattered wetlands are present both within canyons and along mesa tops and canyon sides. There are many soil and geologic features of interest at LANL. LANL also has many unpaved forest access roads that are used and maintained for fire prevention and control and for security patrol purposes.

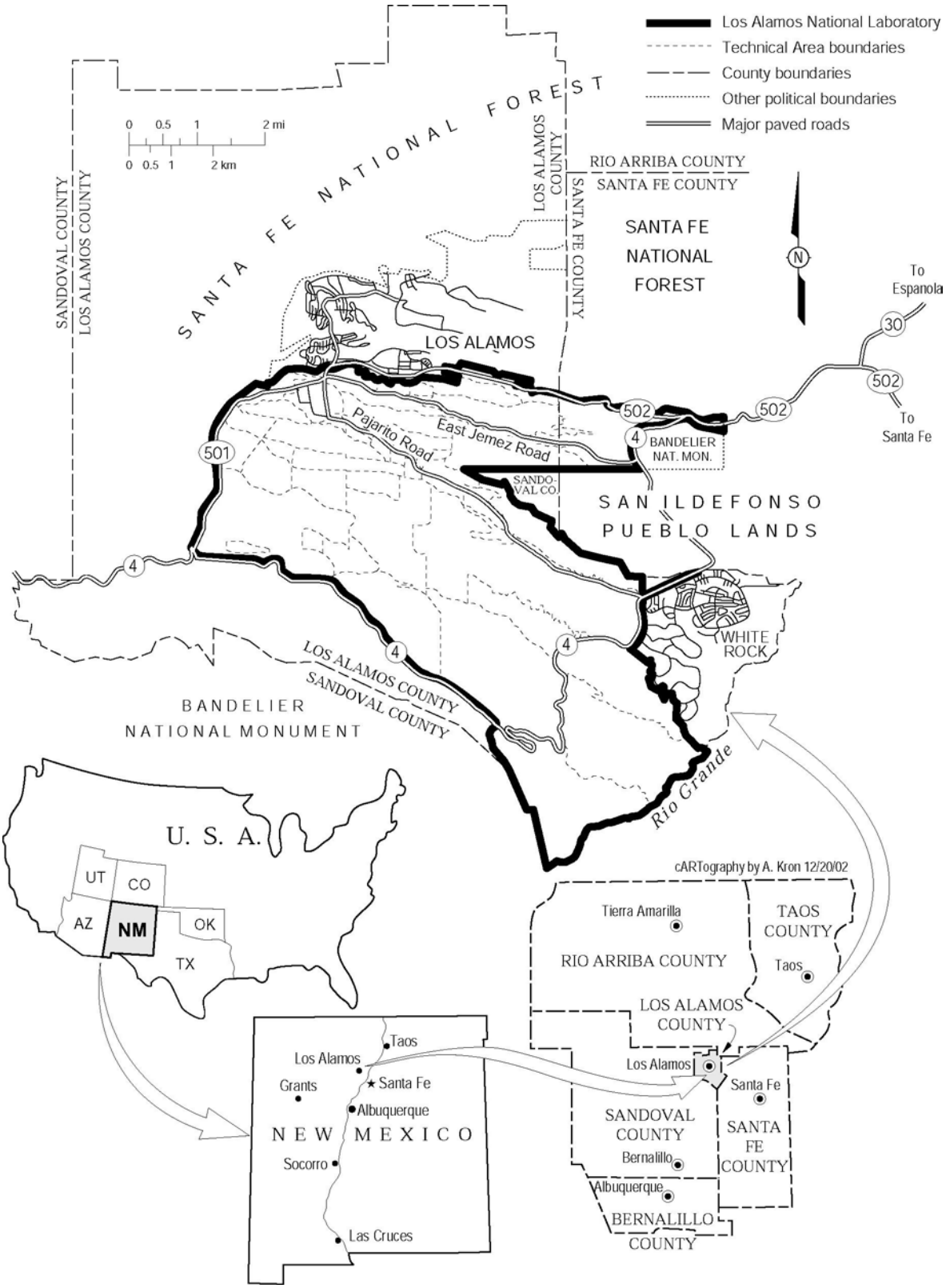

Figure 1. Location of Los Alamos National Laboratory.

LANL was designated in 1976 as a National Environmental Research Park (NERP) by the DOE with the goal of contributing to the understanding of how humans can best live in balance with nature, while enjoying the benefits of technology. This is accomplished by an integrated scientific approach for evaluation of the relevance of stressors to the environment and the mitigation of possible effects from these stressors. Trail use at LANL is one example of how this balance can be affected because lands within LANL have not been subject to some of the same stressors as lands adjacent to its boundaries in part due to the exclusion of grazing, hunting, and commercial activities for the past 60 years. Some adjacent landowners like the Pueblo of San Ildefonso have also excluded some of these same activities from their lands.

As previously stated, many of the social trails at LANL are important for their prehistoric and historic context and are of cultural significance to many people living and working in the area, including Pueblos nearby. Some of these trails have been evaluated for National Register of Historic Places (NRHP) significance, and the State Historic Preservation Office (SHPO) has determined that they are potentially eligible. In April 2003, the SHPO listed some of these roads and trails on the State Register of Cultural Properties (Slick 2003). Some trails fall within areas identified as potential release sites (PRSs) for wastes or areas of concern by the LANL Environmental Restoration Project. These areas may contain contamination as legacies of the Manhattan Project and from the early days of the facility's operation; many of the trails also are within the health, safety, and security buffer zones around research sites previously mentioned. Some of these trails are within sensitive habitat for Federally listed threatened and endangered species and may not be accessible during some portions of the year. Some of the LANL social trails are within or near the land tracts subject to or recently conveyed or transferred under the requirements of Public Law 105-119[3]. Conveyance of additional land to Los Alamos County under this act must occur before the end of the year 2007. Lands transferred to the Pueblo of San Ildefonso have been identified by the Pueblo as lands to be used exclusively by and at the discretion of the members of the Pueblo of San Ildefonso.

Both the Santa Fe National Forest and Bandelier National Monument support their respective Department's Congressionally assigned mission responsibilities for public recreation. These two Federal agencies have implemented land use plans establishing networks of trails on lands under their administrative control that are maintained for recreational use by the public. Bandelier National Monument had over 292,000 visitors in 2002, and has averaged about 344,000 annual visitors over the past decade.

At no time has DOE, or its predecessor agencies, been assigned any public recreational mission(s) by Congress. DOE and NNSA have no formal policy on public access to and recreational use of trails on DOE-administered land. However, individual facility programs for allowing workers and officially invited guests access to trails within facility boundaries for recreational use have been developed at some of the DOE Complex facilities (such as the Oak Ridge Reservation in Tennessee). At LANL, DOE has officially designated one trail for unlimited public hiking access, the commemorative Anniversary Trail, which is located on NNSA-administered land within Technical Area (TA) 74 at the eastern end of LANL near the Anderson Overlook along State Road (SR) 502. This trail was dedicated in 1993 to

[3] The potential conveyance and transfer of these 10 land tracts is the subject of the 1999 DOE/EIS-0293, *Final Environmental Impact Statement for the Conveyance and Transfer of Certain Land Tracts Administered by the U.S. Department of Energy and Located at Los Alamos National Laboratory, Los Alamos and Santa Fe Counties, New Mexico.*

commemorate the 50th anniversary of the Manhattan Project, Project Y through the cooperative efforts of the DOE, LANL, Los Alamos County, and community volunteers.

Inconsistent signing and fencing practices and the lack of a trail access policy at LANL have led to unsanctioned trail use and confusion regarding the approved use of trails and access to LANL lands by the public (Figure 2). The public has the impression that all trail use at LANL is condoned. There are popular trails that are posted with non-government issued signs. Non-DOE issued guidebooks and other sources, including sites on the World Wide Web, provide information about these trails, sometimes with and sometimes without cautionary caveats. Additionally, there are areas at LANL posted with government-issued signs indicating that daytime use is permitted that are also posted with conflicting "No Trespassing" signs. This situation has created ambiguity about permissible trail use, inconsistent trespass enforcement, and some confusion about exactly what constitutes trespassing, particularly from the perspective of the Pueblo of San Ildefonso whose ancestral lands comprise much of the east Pajarito Plateau region where LANL, Bandelier National Monument, the communities of White Rock and Los Alamos, and the Santa Fe National Forest are located. Additionally, the Pueblo of San Ildefonso and other nearby Pueblos are concerned about inappropriate trespassing by LANL trail users onto lands belonging to the Pueblos. The problem of confusing signs within LANL has been addressed in part with the initiation of a Way Finding and Signage Concept Plan that is intended to provide more uniform and helpful directions for visitors and employees. This plan is being phased in as part of revised design specifications and engineering standards, and as budgets permit.

Figure 2. Examples of inconsistent signing and fencing practices at LANL.

NNSA and the LANL management contractor recognize the importance that the social trails at LANL play in the use and enjoyment of the area by its inhabitants and LANL workers and officially invited guests. Many of the social trails are in daily use while others are used less frequently (Figure 3 shows some of these trails). A large number of the LANL research areas are remote and are scattered about LANL; these research areas may have large health, safety, or security designated buffer zones associated with them. Some of the more densely developed and improved areas of LANL lack adequate or convenient vehicle parking. In both instances, the social trails at LANL serve both recreational and work-related uses for foot and bicycle traffic at LANL.

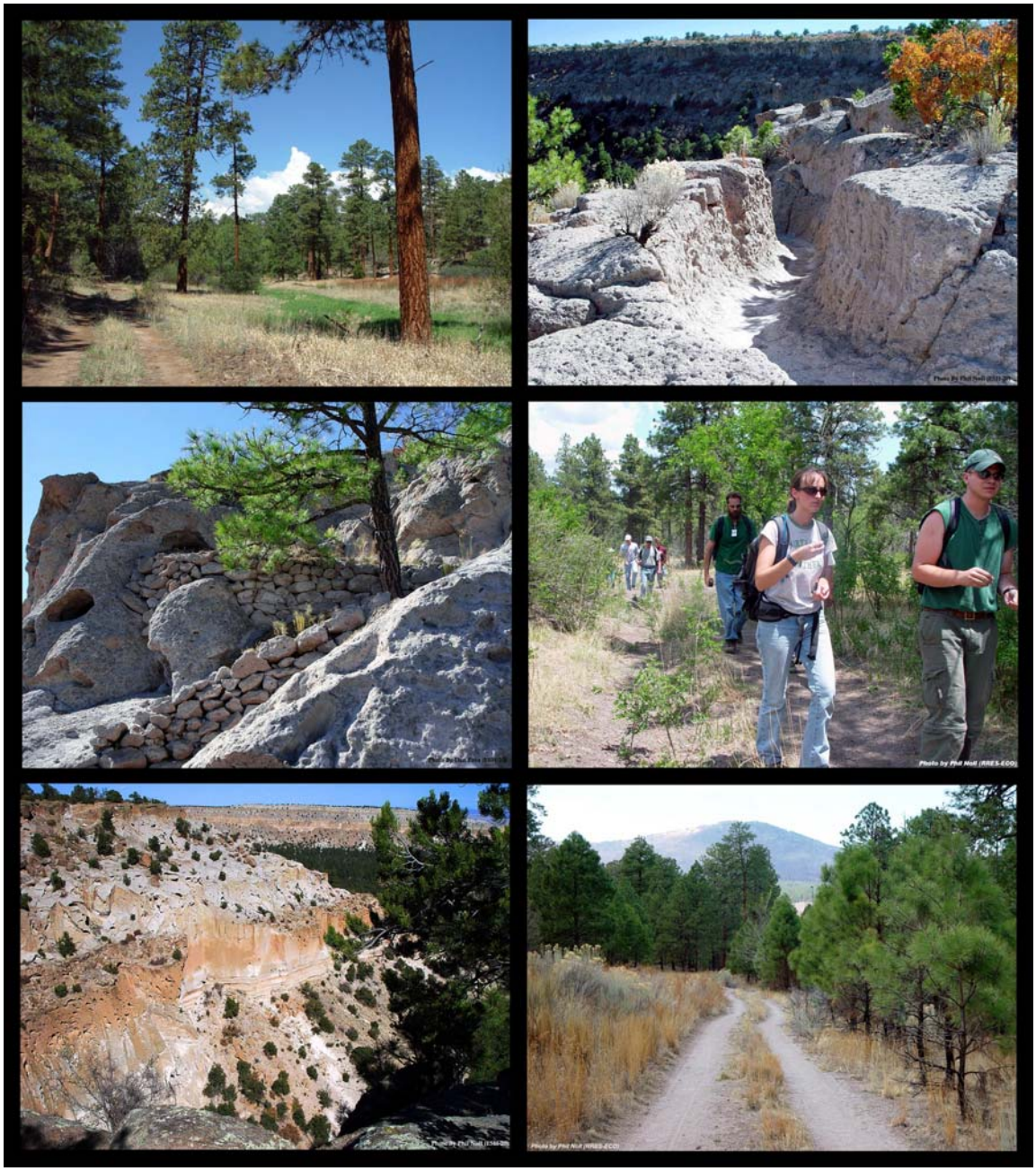

Figure 3. Views of trails at LANL.

Los Alamos County has established a Parks and Recreation Board that includes a Trails and Pedestrian Pathway Subcommittee. The purpose of this subcommittee is to consider the use and maintenance of a network of interconnecting trails around Los Alamos County that provides links to areas nearby. In 1994, Los Alamos County adopted a *Trails Management Plan for Los Alamos County* (LAC 1994). This Plan recognized the necessity of cooperation and participation with other area land owners and stewards that would be needed for successful implementation of an urban trail system connecting Los Alamos town site and White Rock communities with trails that reach into land administered by the NNSA, Santa Fe National Forest, and Bandelier National Monument. In July of 1995, the Subcommittee presented a formal report to DOE proposing that 17 trail corridors be established (LAC 1995). Subsequently, the Trails and Pedestrian Pathways Subcommittee has contacted DOE, NNSA, and LANL requesting information regarding DOE's public trail use policy and advocating for official sanction of public access to some LANL trails. This Federal action would require the NNSA to determine and formally designate trails for public use.

The May 2000 Cerro Grande Fire has caused NNSA and LANL to periodically close trail areas within LANL to recreational and unapproved worker use due to various threats. During extreme fire danger periods many trails and roads have been closed to both recreational and work-related uses in an effort to both prevent new wildfires and to protect members of the public and workers along the trails should a wildfire occur. Likewise, trails that traverse canyon bottoms have been periodically closed to the public during summer months due to the enhanced post-fire threat of flash flooding. Safe maintenance of LANL social trails has become a recent concern with regard to soil erosion occurring along the trails, most of which haven't been maintained in any routine fashion over the past 60 years. Other major LANL trail use concerns include the issue of appropriate trail use at LANL and security threats to LANL and its NNSA mission assignments.

Pertinent Trails Issues

- *DOE, NNSA does not have a public recreational mission established by Congress.*
- *Public gets conflicting messages because signs, access controls, and enforcement at LANL vary.*
- *Trespassing occurs from LANL onto adjacent lands where trail use is not permitted.*
- *Trail use poses threats to some cultural and natural resources.*
- *Trail use in certain LANL areas increases the risks of human exposure to PRSs and other operational and natural hazards. Some of the natural hazards have been magnified by the Cerro Grande Fire.*
- *Security concerns are posed by the use of certain LANL trails.*

1.3 Statement of Purpose and Need for Agency Action

DOE and NNSA must balance their Congressional mission requirements with other land use and stewardship considerations at LANL. The NNSA administers the 40-square-mile LANL property that adjoins lands under the administrative control of the Santa Fe National Forest;

Bandelier National Monument; the Pueblo of San Ildefonso; Los Alamos County; and various public and private lands in Los Alamos and Santa Fe Counties. There are many unimproved social trails at LANL that are used by its employees and officially invited guests[4], as well as by local residents and the general public, for work-related, cultural, and recreational reasons. Throughout the past six decades people have used these LANL social trails for getting to and from work and for recreational purposes such as hiking and riding horses, bicycles, and other mechanical and motorized devices. Many of these trails originate outside LANL boundaries and may traverse land administered or owned by several government entities or private parties. These social trails include unpaved trails, roads, and portions of prehistoric and historic trails and roads that may be eligible for inclusion in the NRHP. LANL social trails also traverse areas of potential contamination and areas where sensitive natural and cultural resources are present.

The NNSA needs to determine the permissible use of trails within LANL in order to facilitate the establishment of a safe, viable network of linked trails across the Pajarito Plateau that traverses land holdings of various private and government entities for recreational use and for alternate transportation purposes (such as riding bikes to and from residences and worksites). The purpose of such action would be to provide acceptable access to trails within LANL where such use is desired and appropriate without posing a threat to DOE and NNSA mission support work at LANL or disrupting LANL operations. Public safety, operational security, and the protection of sensitive natural and cultural resources would be primary considerations in the establishment of such action at LANL.

1.4 Scope of This EA

A sliding-scale approach (DOE 1993) is the basis for the analysis of potential environmental and socioeconomic effects in this programmatic EA. That is, certain aspects of the Proposed Action have a greater potential for creating environmental effects than others; therefore, they are discussed in greater detail in this EA than those aspects of the action that have little potential for effect. This EA, therefore, presents in-depth descriptive information on ecological resources such as threatened or endangered species to the fullest extent necessary for effects analysis. On the other hand, implementation of the Proposed Action would have no effect on land use or visual resources at LANL. Thus, no description of such effects is presented.

When details about a Proposed Action are incomplete, as a few are for the Proposed Action evaluated in this EA, a bounding analysis is often used to assess potential effects. When this approach is used, reasonable maximum assumptions are made regarding potential aspects of project activities (see Chapters 2.0 and 3.0 of the EA). Such an analysis usually provides an overestimation of potential effects. In addition, any proposed future action(s) that exceeds the assumptions (the bounds of this effects analysis) would not be allowed until an additional NEPA review could be performed. A decision to proceed or not with the action(s) would then be made.

1.5 Cooperating Agencies

The CEQ Regulations (40 CFR 1500-1508) define cooperating agency as any Federal agency other than lead agency which has jurisdiction by law or special expertise with respect to any

[4] "Officially invited guests" is intended by this EA to describe people who have been invited by DOE or the LANL contractor to be at LANL for any purpose deemed appropriate by DOE or the site contractor. These individuals may include the staff of regulatory agencies, members of Native American Pueblos and Tribes, and members of various search and rescue teams, emergency responders, or security teams.

environmental impact involved in a proposal, and specifically notes that a state or local agency or Indian tribe may also become a cooperating agency by agreement with the lead agency. Part 1501.6 provides specifics on the roles of a cooperating agency. On November 26, 2002, NNSA as the lead agency for the preparation of this EA invited Los Alamos County, the Santa Fe National Forest, Bandelier National Monument, and the four Accord Pueblos[5] to be cooperating agencies. Bandelier National Monument has become a cooperating agency while Los Alamos County, the Forest Service, San Ildefonso Pueblo, and Santa Clara Pueblo have instead chosen to participate less formally by attending scheduled management review team meetings, providing comments, and reviewing the draft document.

1.6 Public Involvement

DOE, NNSA provided written notification of the planned preparation of this EA to the State of New Mexico, the four Accord Pueblos, Acoma Pueblo, the Mescalero Apache Tribe, and to over 30 stakeholders in the LANL area on March 25, 2002. Upon issuance of the predecisional draft EA on July 11, 2003, NNSA again notified these parties of the availability of the EA for review and comment through August 5, 2003, by letter. Over the following week, notices of the availability of the EA for review and comment were also placed in three local newspapers and on the LANL electronic Daily NEWSBulletin, as well as the LANL-on-line Meeting Calendar. These notifications included information about a public information and EA comment opportunity meeting held in Los Alamos on July 30, 2003. Additionally, three days before the meeting public notice announcements of the meeting were aired on KRSN AM Radio and on the day of the meeting an article appeared on the front page of the Los Alamos Monitor newspaper. Comments on the draft EA received or postmarked before the end of the 21-day comment period were considered where appropriate and to the extent practicable in the preparation of the final EA; comments received after August 5, 2003, were considered to the extent practicable in the preparation of the final EA.

In total, 125 comment documents were received on the Trails Management Program EA. The comment documents included transcriptions of telephone calls, letters, and e-mail messages that have been reproduced and placed in Appendix A of this EA. Primary themes of the comments received on the predecisional draft EA included: *expressions of personal preferences regarding one or more of the three alternatives analyzed in the EA; concerns regarding adequate public notice of the proposed Trails Management Program, the meeting held on July 30th, and of the NEPA compliance process; concerns regarding the quality of life at Los Alamos and the health and well being of LANL workers and Los Alamos residents; concerns and suggestions for implementing a Trails Management alternative; concerns about trails access while a Trails Management Plan was being implemented; concerns about access to trails by emergency response teams, including their use by these teams for training purposes, if trails were closed*; and *suggested revisions to the Draft EA*. These major comment themes are elaborated upon in the following bulleted text and general NNSA responses are provided in the paragraphs that follow.

[5] Four Pueblos that have each executed formal accord documents with DOE setting forth the government-to-government relationship between each of the Pueblos and DOE. The four Pueblos are Cochiti, San Ildefonso, Santa Clara, and Jemez.

General Comments:

Many commenters expressed their personal preference for implementation of one of the alternatives analyzed. Reasons cited for preferring the Trails Management Program Alternative, the Trails Closure Alternative, or the No Action Alternative included: concerns that efforts to manage the trails would not receive adequate funding or staffing and that the management process would not include representation of certain user groups; fears that all or most trails would be closed to recreational opportunities or to certain user groups; a lack of any perceived problem with the status quo, and recognition that resources were being adversely effected in some areas and that repairs to some trails were needed.

NNSA Responses:

LANL management, taking into consideration the recommendations provided by the Trails Assessment Working Group and other stewardship priorities, would establish funding and staffing levels for implementing a LANL Trails Management Program. It would be expected that resources requested by that group would be commensurate with anticipated work identified as being needed over the next year and would be dependent upon the trail(s) being evaluated. The Trails Assessment Working Group would seek input or recommendations from various user groups as they determine necessary or advisable. With such a long-term, on-going effort, it is expected that over the years many people will be involved in the program at many different levels of involvement. As stated in Chapter 2.1 of the EA, one of the goals of the proposed Trails Management Program would be "to facilitate the establishment of a safe, viable network of linked trails across the Pajarito Plateau that traverse land holdings of various private and government entities for recreational use and for alternate transportation purposes without posing a threat to DOE and NNSA mission support work at LANL or disrupting LANL operations." Meeting this goal would be incompatible with closing all trails at LANL. This goal could be met, however, through the LANL Trails Management Program at LANL by one of at least three means: by rerouting segments of trails to avoid sensitive resources, by closing trails if segment rerouting were not possible, or by opening new trails that do not endanger sensitive resources. Since LANL operations to facilitate DOE and NNSA mission responsibilities shall be conducted in compliance with applicable environmental and cultural laws and regulations, most conflicts between meeting legal and regulatory needs can be resolved by rerouting segments of trails; or if this were not feasible, a trail may be closed. Under the program, new LANL trails could be planned and constructed as proposed or a need was identified. Chapter 1 of the EA identifies issues and concerns related to the status quo with regard to trail use at LANL. The information presented in the EA does not detail the specifics about existing individual trails that require correction in order for NNSA to meet some of our regulatory responsibilities. Continuation of the status quo does not meet NNSA's stated Purpose and Need for Agency Action, and it would not provide for circumstantial changes that may occur over time or reactions to altered environmental conditions that may be needed. While certain individuals may be happy with their preferred trails as they currently exist and not wish them to change, change in nature is inevitable and the status quo does not provide a mechanism to reasonably address changes as they become needed. Other individuals have recognized erosion along the trails they use and would like to see the situation addressed before significant damage or undesirable changes have occurred.

General Comments:

Reasons cited for concerns regarding adequate public notice of the proposed Trails Management Program, the meeting NNSA hosted on July 30th, and of the NEPA compliance process included: a perception of inadequate prior notification of the preparation of an EA or of the proposed Trails Management Program; a perceived lack of adequate advance notification effort on the part of NNSA for the meeting; a desire to have the draft EA document electronically publicly available; a desire for a longer comment period; and a lack of understanding of the NEPA compliance process, including the length of the comment period, the need to apply that process to the proposed program at LANL, and the need for consideration of the Trails Closure Alternative as a reasonable alternative to the Agency's purpose and need for action.

NNSA Responses:

As stated in the first paragraph of this section of the EA, the NNSA made reasonable attempts and put forth reasonable effort to notify interested parties about both the preparation of the EA and about the meeting it hosted on July 30th. In complying with NEPA, the NNSA adheres to the Council on Environmental Quality's NEPA implementing regulations (40 CFR 1500-1508), to the DOE's NEPA implementing regulations (10 CFR 1021), and to DOE's NEPA implementation order (DOE O451.1b). These regulations identify the NEPA compliance process and establish how DOE will undertake NEPA compliance actions, including what constitutes an "action" for which DOE must consider NEPA compliance, notification to be undertaken of the preparation of NEPA documents, the comment and review period allowed, the range of reasonable alternatives that need to be analyzed in NEPA documents, and so forth. For example, the DOE's NEPA implementing regulations establish that EA comment periods will be from 14 to 30 days long at DOE's discretion (10 CFR 1021. 301); in complying with NEPA, all reasonable alternatives for meeting the identified Agency purpose and need for action must be analyzed in an EA, even those that may not be popular or desirable due to other factors. NNSA places NEPA documents in DOE Reading Rooms and to the extent allowed, in public libraries. Before the tragic events of September 11, 2001, DOE routinely placed its NEPA documents on the World Wide Web for public review. Since that time, DOE has revised its policy of placing electronic versions of NEPA documents on the Internet and is carefully screening all documents its posts to its websites. As a result not all NEPA documents are available to the public via the Internet system or if available may not be posted in a timely fashion. We regret any inconvenience this may cause. Hardcopies of NEPA documents remain available upon request.

General Comments:

Reasons cited for concerns regarding the quality of life at Los Alamos and the health and well being of LANL workers and Los Alamos residents included: the perceived love of outdoor recreational opportunities that is believed to be pervasive in the Los Alamos community and among LANL workers; the perception that area trails are assets to recruiting and keeping LANL workers, serve as assets to the town, and enhance property values and local tourism efforts; concerns that recreational access to trails located within Santa Fe National Forest would be eliminated if certain trails were closed; fears that certain user groups would be excluded from using any of the LANL trails or the trails of their choice; concerns that LANL trail closures

could result in more people using roads and highways for commuting and recreational purposes resulting in elevated safety concerns; concerns that the Cerro Grande Fire and other LANL-related events have sufficiently reduced the quality of life for area workers and residents that trail closures would be a "final straw" resulting in people moving from the area and in leaving the local job force; and concerns that the temporary and permanent closure of trails due to high fire danger conditions, unsafe post-fire conditions in the general Los Alamos area, or the transfer of certain land away from DOE ownership, has enhanced the desirability of LANL trails for recreational use as trails on other properties have been closed and the cumulative loss of the use of LANL trails would further adversely affect the general quality of life for area residents and also the morale of LANL workers.

NNSA Responses:

As stated in Chapters 1 and 3 of the subject EA, there are many trails within the LANL area that reach across the Pajarito Plateau and pass through lands under the management, control or ownership of a variety of parties and entities. Many of these trails are centuries old; some of the trails are of very recent origin. A wide suite of natural and cultural resources is present along the trail reaches. The importance of the trails to various people living and working along the Pajarito Plateau is as varied as the individuals involved. As stated in Section 1.2, "NNSA and the LANL management contractor recognize the importance that the social trails at LANL play in the use and enjoyment of the area by its inhabitants and LANL workers and officially invited guests." Chapter 3.1 of the document, in describing the existing LANL environment, includes the statements: "Outdoor recreation is a significant component of tourism activity in Los Alamos County and adjacent counties. Trail access contributes in other ways to the local economy through contribution to overall quality of place. Outdoor recreational opportunity is an important component of what makes living in Los Alamos attractive to prospective residents and employees of LANL and other employers." The stated goals for proposed Trails Management Program would reinforce the acknowledged importance of trails to residents and workers of the Pajarito Plateau and further the use of trails by providing a mechanism for making necessary repairs and enhancements to the overarching system of trails. Many of the stated and unstated concerns about the quality of life and the health and well being of LANL and Los Alamos County workers and residents dovetail with the NNSA's proposal for a Trails Management Program to facilitate trails use for future generations to enjoy the use of trails as much or more than past generations have enjoyed them.

General Comments:

Reasons cited for concerns about and suggestions for implementing a Trails Management alternative included: concerns about adequate funding levels and staffing and fears of a de facto closure of all trails at LANL for recreational purposes due to a lack of adequate funding or staffing; the perceived desirability to community volunteer labor for performing trails maintenance and other work; concerns that a Trails Management Program should be implemented expeditiously rather than over a 10-year period; concerns about and suggestions for inviting the many user groups to participate in the management program implementation; suggestions for the need to provide adequate general public participation and comment in individual trail reviews, and suggestion that a formal DOE Trails Policy be written and adopted.

NNSA Responses:

Funding necessary to implement a trails management program, as already mentioned in this section, will be a function of work identified as being required. Requirements for implementing the Trails Management Program would be the subject of a Mitigation Action Plan (MAP). NNSA recommendations to the Trails Assessment Working Group for implementation of the Program could be provided through this Final EA, the MAP and subsequent Team discussions. How the trails are maintained, the level of maintenance required, the rate at which trails could be evaluated and actions implemented, and so forth, would be predicated by the intended user groups and the sensitivity of area resources to degradation by the users, among other factors. Establishment of a mechanism for inviting volunteer labor would be pursued as much for its desirable cost reduction benefit to the Program as for its desirable inclusion of the people who would benefit from the trails - the trails users. NNSA and DOE will not undertake a formal Trails Policy as suggested, however. Such a policy would not be germane to many DOE sites and is not needed in order to establish local use of trails at LANL.

General Comments:

Reasons cited for concerns about trails access while a Trails Management Plan was being implemented included: concerns about all of the trails being closed to recreational use while each individual trail is being reviewed and determinations about its closure or continuing use are made over the time it takes to complete a review of all the trails (about 10 years); concerns that certain trails could be closed for up to ten years while a particular trail awaits the management committee's review and determination; and concerns that trails closed to recreational use temporarily due to elevated level of wildfire danger would not be reopened when prevailing site conditions improved and the danger level returned to a more moderate state.

NNSA Responses:

Chapter 2 of the EA discusses the proposed Trails Management Program. Implementing the Program over a ten-year period was felt to be necessary given the complexity of the trail reaches and the issues surrounding the various trails reach areas, the difficulty of establishing a functional working group and other factors. The description of the Trails Management Program does not include the closure of all trails or the closure of any specific trails to recreational use pending their individual review and the completion of any repairs or other associated actions. The Program's description includes provision for temporary closures as needed, which would include closing a trail for the period of time needed to affect repairs or maintenance actions. Such closures are common with Bandelier National Monument and Santa Fe National Forest nearby and should not be of long duration. Trails within LANL were closed during the summer months of 2003 temporarily due to an enhanced level of fire danger as a result of the drought being experienced by the southwestern portion of the United States; these trails were reopened for recreational use in mid-August 2003. Temporary closures of trails over the Pajarito Plateau to recreational users may be necessary for a variety of reasons in the future and should not be confused with permanent trail closures that may also be necessary, but which would be clearly marked and refurbished as identified in the Proposed Action description.

General Comments:

Reasons cited for concerns about access to trails by emergency response teams, including the use of trails by these teams for training purposes, if trails were closed included: the need for multiple trail use to train search and rescue dogs for difficult terrain emergency search responses, the need for trails over a variety of terrain conditions to train dogs for emergency response work; and the need for firefighters and security personnel to have access to trails even if they were not LANL employees.

NNSA Responses:

Emergency response teams, groups and individuals, including any animals associated with their actions and training or testing exercises, would be accommodated at LANL and along trails at LANL under any of the alternatives considered in this EA. If a trail were closed to recreational use under the proposed Trails Management Program, the trail could remain open to LANL workers and officially invited guests. The definition of "officially invited guests" provided in Chapter 1 of the EA has been modified to provide examples of those individuals, teams, entities or organizations that comprise officially invited guests.

General Comments:

Reasons cited for revising the predecisional draft EA included: the need to change the tone of the EA so that it doesn't seem biased against trail users; the need to further consider the mental and physical health benefits derived from trails use and to expand the text regarding the benefits to LANL workers provided by the recreational opportunity of the trails network at LANL; the need to revise the impacts description of socioeconomic effects of the Trails Closure Alternative; the need to reconsider impact severity of trails use on some resources; the need to consider the benefits derived from trails use related to the security of LANL lands; and the need to include text to reflect the use of LANL trails by various community organizations or volunteer groups.

NNSA Responses:

NNSA is not of the opinion that the text of the EA is "biased against trail users" given that the Proposed Action specifically would facilitate recreational trail use at LANL, along with the other examples of EA text already repeated in this section. Nor is NNSA of the opinion that the text of the document requires major revision to change its overall "tone" of presentation. A review of the draft EA was undertaken and where appropriate, and to the extent practicable, minor text changes have been made in response to specific text changes recommended by those who commented.

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2.0 Description of the Proposed Action and Associated Alternatives

This section describes three reasonable alternatives to address the NNSA's purpose and need stated in Chapter 1. The three alternatives are the Proposed Action (the Establishment of a Trails Management Program at LANL [LANL Trails Management Program Alternative]); the Trails Closure Alternative; and the No Action Alternative that reflects what is now happening and serves as a baseline with which to compare the consequences of the Proposed Action and the Trails Closure Alternative.

2.1 General Overview of Proposed Action (LANL Trails Management Program Alternative)

The Proposed Action would consist of implementing a Trails Management Program at LANL. This program would address both public use of social trails within LANL and also social trail use by workers at LANL and by officially invited guests. The five goals of this management program would be (1) to reduce the risk of damage and injury to property, human life, and health, and sensitive natural and cultural resources from social trail use at LANL; (2) to facilitate the establishment of a safe, viable network of linked trails across the Pajarito Plateau that traverse land holdings of various private and government entities for recreational use and for alternate transportation purposes without posing a threat to DOE and NNSA mission support work at LANL or disrupting LANL operations; (3) to maintain the security of LANL operations; (4) to respect the wishes of local Pueblos to maintain access to traditional cultural properties (TCPs) by Pueblo members while also preventing unauthorized public access to adjacent Pueblo lands and other lands identified as both religious and culturally sensitive areas to Native American communities; and (5) to adapt trail use at LANL to changing conditions and situations in a responsive manner.

There are about 57 miles (mi) (92 kilometers [km]) of social trails within LANL. A total of 13 major social trails have been identified and are known to be in general use at the LANL facility (see Table 1 for a list of these 13 trails). Under the Proposed Action, the 13 major social trails at LANL, and possibly others, would be reviewed through the Trails Management Program using uniform criteria to evaluate each in terms of the five program goals previously noted. Determinations to repair and maintain some social trails subject to specific controls, while

Table 1. Major Social Trails at LANL

Trail Name	Comments
Ancho Springs	Near White Rock Canyon Reserve
Anniversary	Easily accessible from Main Hill Road
Breakneck	Near Anniversary and Los Alamos Canyon Trails
Broken Mesa	Near White Rock Canyon Reserve
Dead Man Crossing	Crosses Los Alamos Canyon
Devaney-Longmire	Crosses Los Alamos Canyon
Los Alamos Canyon	Within Los Alamos Canyon
Mortandad Canyon	North of TAs 35, 50, and 55 and Pueblo land
Mattie Brook	Near TA-21 – a land transfer tract
Painted Cave Access	Close to San Ildefonso lands
Potrillo Canyon	Near White Rock Canyon Reserve
Water Canyon Loop	Near White Rock Canyon Reserve
Wellness Trails network	From TA-3 to TA-16, outside fence

closing other social trails to all recreational users would be made based on the evaluation criteria. Workers at LANL and officially invited guests performing tasks explicitly requiring use of a trail closed to recreational users, may be permitted to do so. Closed trail corridors would be reclaimed as appropriate through the Trails Management Program and signs would be posted to announce their closure. A public information and outreach program would be established to disseminate information about trail closures. Other existing social trails would be identified, considered for continuing use, and either repaired or reclaimed as appropriate. New trails proposed for development within LANL would undergo the same general review performed for the existing trails and may or may not be constructed based on the program assessment.

This Trails Management Program at LANL would initially be composed of a series of individual projects that would be conducted over about 10 years with ongoing, long-term trail maintenance projects conducted thereafter. These initial projects would be conducted to bring selected existing social trails at LANL to the desired end-state for appropriate use, followed by an on-going maintenance program to maintain the social trails in this desired state. One or two of LANL's social trails could be repaired or closed in any given year, contingent on funding. Individual initial and maintenance projects would be separately tailored to the specific needs and conditions of each social trail and would be composed of any or all of several different measures discussed below in this section. Individual projects would employ mechanical or manual repair methods.

New trail development would be considered after the known and identified existing social trails at LANL were evaluated and the trails designated for repair and long-term maintenance had been identified. Each project, for both new trails and for existing trails, would incorporate all of the planning measures listed in this EA section, along with the implementation of any or all of several different safety, security, environmental, and cultural resource protection, repair, and long-term maintenance measures for the identified trail. Additionally, each trail project may also include one or more of the post-repair monitoring and assessment measures detailed below. Measures may be employed either individually or in series for any given area at different time periods.

All program projects and their related activities would be conducted in compliance with LANL site permit requirements and all applicable local, state, and Federal laws and regulations. The Trails Management Program would be consistent with the LANL Comprehensive Site Plan and supporting planning and design standards and guidelines. The planning and implementation of individual projects would be coordinated with adjacent land managers and owners to optimize social trails management across the Pajarito Plateau.

The proposed LANL Trails Management Program would include the following project planning measures. Each of these measures is discussed in greater detail in Section 2.1.1.

- Individual Project Planning Measures
  - Establishment of a Trails Assessment Working Group
  - Trail Use Assessment and Needs Identification
  - Condition and Operational Assessment
  - Security Assessment
  - Identification of Resource Issues
  - Coordination with Land Management Agencies, Pueblos, and Land Owners
  - Development of End-State Conditions

- Formulation of Construction, Repair, and Environmental Protection Measures

After planning is completed and decisions made on which trails to repair or to close, the implementation of each project would include some or all of the following components of the repair and construction measures, environmental protection measures, safety measures, and security measures listed below and discussed in greater detail in Sections 2.1.2, 2.1.3, 2.1.4, and 2.1.5. Worker protection and health and safety measures would always be included for each project.

- Repair and Construction Measures
  - Equipment and Personnel Involved
  - Types of Repair or Construction Measures
- Environmental Protection Measures
  - Threatened and Endangered Species Protection Measures
  - Cultural Resources Protection Measures
  - Water Quality Protection Measures
- Safety Measures
  - Worker Protection and Health and Safety Measures
  - Public Safety Measures
- Security Measures
  - Types of Security Measures

Following the implementation of the repair measures, each individual project may also include one or more post-repair assessment measures and, at a minimum, would include assessment of the desired end-state conditions achieved by project implementation (discussed in detail in Section 2.1.6).

- End-State Conditions and Post-Repair or Post-Construction Assessment
  - Cultural and Ecological Field Studies
  - Watershed Assessment and Monitoring
  - Damages Assessment
  - Health and Safety Assessment
  - Security Assessment

Long-term maintenance projects would follow to maintain the desired end-state condition for each trail. Long-term maintenance measures would be planned according to the previously stated planning measures when it is determined that maintenance is necessary. Trail conditions would be reviewed about every five years or as needed. In addition to measures used initially to repair a trail, periodic mowing and grading of access roads and trail treads would also be employed during the long-term maintenance of some trails. Long-term maintenance measures would integrate environmental protection, public safety, and security measures in a similar manner as employed by the initial project. Engineering best management practices (BMPs) should be used to implement tasks addressing these issues.

A future trail maintenance project along a specific existing social trail might, for example, consist of all the listed planning measures; implementation of repair measures; implementation of measures for protection of environmental resources; post-repair end-state assessment and ecological field studies; and implementation of periodic long-term maintenance measures. A

future new trail might, for example, undergo all listed planning measures; undergo construction; and then undergo end-state assessment with cultural and ecological resources field studies.

2.1.1 Individual Project Planning Measures

The first step in the implementation of each project would be to formulate action plans that would identify potential trail uses and users and would assess potential risks and environmental concerns. Repair or construction plans would be developed later. The planning process would consist of several elements that are discussed as follows:

Establishment of Trails Assessment Working Group. LANL would lead and coordinate a standing committee that would include LANL cultural, ecological, health and safety, security, site planning, and facilities specialists and representatives from NNSA. Los Alamos County, Bandelier National Monument, the Santa Fe National Forest, and the four Accord Pueblos would be invited to participate. The Trails Assessment Working Group would convene as necessary to conduct trail assessments and needs identification and the health and safety, security, and resource assessments that are described below. The Trails Assessment Working Group would advise the LANL Associate Director of Operations (ADO) on trails management within LANL boundaries and, as appropriate, advise and represent the ADO on trails issues involving adjacent properties.

Use Assessment and Needs Identification. Trail users and uses of existing trails would be determined. This effort would be founded upon assessments conducted by the Trails Assessment Working Group. Existing and proposed trails would be inventoried and types of users identified using surveys of LANL workers and County residents. The need for future trails construction and use would be similarly assessed.

Condition and Operational Assessment. Trails at LANL present varying degrees of health and safety risks to users. Each trail would be evaluated to identify site conditions and for operational factors such as the presence of soils and vegetation contaminated with radioactive, organic, or high explosives products; and trail proximity to PRSs, waste storage areas, radiation buffers, high-explosives exclusion zones, or various experimental areas. Some trails may be suitable for general public use while others may be suitable only for workers at LANL and officially invited guests.

Security Assessment. Physical and operational security is essential to supporting LANL mission requirements. Trail use cannot create situations that would compromise this security. Each trail would be evaluated to determine security implications resulting from its continued use. A trail that may otherwise appear to be suitable for use by the public could be permanently or temporarily closed because of security concern issues.

Identification of Sensitive Resource Issues. Integral to the development of a Trail Management Program is the identification of resource issues particular to individual trail reaches within LANL. These resource issues or conditions can include the presence of threatened and endangered species in the area and associated potential or occupied habitat; the presence of cultural resources, including TCPs; the presence of wetlands; and susceptibility of the trail reach to erosion. Many of these resource issues are discussed in existing LANL documents. Management plans have been prepared for some of these individual resources, and when available, these plans would be prime information and guidance documents. For example, the LANL Threatened and Endangered Species Habitat Management Plan (LANL 1998) (currently

being modified to incorporate habitat changes as a result of the Cerro Grande Fire) is used to direct proposed activities away from areas of potential use by threatened and endangered species or to sufficiently impose mitigation measures on such activities so as to render them non-adverse in effect to the species or their potential habitat areas. Likewise, the presence of sensitive cultural resources on or near a trail could require all or a portion of the trail to be closed or rerouted. Additional regulator consultation with regard to the *Endangered Species Act of 1973* (ESA) and the *National Historic Preservation Act* (NHPA) may be required for trail projects planned within sensitive areas. Resource management plans for some sensitive resources at LANL are in development and will be completed over about the next five years. Identification of sensitive resource areas at LANL would be based on the current best available information and trail use would be considered for the trail reaches based on that information.

Coordination with Neighboring Land Management Government Agencies, Pueblos, and Other Land Owners. Coordination with neighboring land management entities would be integral to the trail use program planning process. Currently, coordination of issues spanning the Pajarito Plateau is accomplished through the East Jemez Resource Council, which is composed of regional governmental agencies, Pueblos, and other landowners who manage land along the east flank of the Jemez Mountains. This coordination would serve to maximize trail use planning and end-state conditions and could result in cooperative participation in the implementation of certain repair measures. The Trails Assessment Working Group could coordinate land management issues related to trails at LANL through working groups such as the East Jemez Resource Council. DOE's American Indian Tribal Government Policy (DOE 1992) outlines the process used to implement government-to-government consultations with neighboring Pueblos and Tribes. This policy would be employed when addressing the concerns of these communities.

Development of End-State Conditions and Recommendation to Close or Maintain Trails. One of the key planning objectives would be the ultimate trail condition that would be desired as the end-state of the projects initiated and maintained under the Trails Management Program. At most locations within LANL, the desired trail end-state condition for recreational use would be a trail with a minimum of readily visible engineered features that is appropriately accessible for its intended users. For LANL worker use, the desired end-state would be a trail that is in a safe condition and that perhaps minimized walking distances between two facility or use areas. In other cases, the desired end state would be to close and reclaim a trail and perhaps also to rehabilitate previously affected resources. Planning the exact end-state conditions desired for a trail would be accomplished through the steps previously mentioned and consideration of site and surrounding area conditions and the trail's identified cultural sensitivities. This could include either maintaining or closing a given trail or trail segment. End-state trail conditions would be regularly monitored and evaluated during post-treatment assessments. Options could include restricted use by workers at LANL for work-related purposes and by officially invited guests; or use could be open to the general public for recreational purposes. The appropriate options for end-state trail use would include non-motorized modes such as walking and hiking, horseback riding, cross-country skiing, and bicycling.

Formulation of Construction, Repair, and Environmental Protection Measures. Recognizing the planning considerations addressed above, construction and repair plans would be developed for each trail. Primary trail construction and repair measures would focus on enhancing the aesthetics of the trail for its intended users and those that address health and safety issues. These measures are further discussed in Section 2.1.2. The identification and inclusion of

environmental protection measures that would be taken to protect the quality of identified resources is discussed further in Section 2.1.3. These construction and repair plans would be referenced in any contract requirements.

Repair and construction work has the potential to disturb previously unknown hazardous waste disposal sites or previously unknown cultural resources. If excavation or construction activities disclose previously unknown or suspect disposal sites, work would be stopped and LANL's Environmental Restoration Project staff would review the site and identify procedures for working within that site area. Soils from PRSs may be returned to the excavated area after disturbance when feasible or would be characterized and disposed of appropriately. Should previously unknown cultural resources be discovered during construction or repair work, work would stop and LANL's cultural resources specialists would review the evidence, identify procedures for working in the vicinity of the cultural resources, and initiate any necessary consultation with Federal, state, and tribal entities.

2.1.2 Repair and Construction Measures

Initial repair, ongoing maintenance, and new construction measures would be identified for each trail project based on individual site conditions and the desired end-state results. Common to all projects would be the use of appropriate equipment and qualified personnel.

Equipment and Personnel Involved. A typical individual project would involve from 6 to 20 qualified personnel. One or two vehicles such as cars and light duty trucks may also be required. Areas with slopes that exceed 30 percent, and single-track trails, would not be repaired or constructed using vehicular equipment. Hand-held tools and equipment like shovels, axes, and chainsaws could be used to repair single-track trails and areas exceeding 30 percent slope. It may also be appropriate to use animals to bring equipment and supplies into such areas. Dust suppression requirements could necessitate the use of water spray trucks or hand-held spray equipment.

Types of Repair Measures. Typical repair and construction measures would be those normally associated with trails that have been frequently used but have lacked regular maintenance over the years. Access roads could be improved, or blocked and removed. A parking area might be expanded or improved, or closed off to use. A trail segment might be stabilized using engineering BMPs such as the use of silt fences, straw bales, organic mulch material, concrete, stones, or gravel to check erosion and improve trail safety. Signs and fencing or barriers would be installed to direct or redirect trails, or close off trails to future use. Trail segments could be repaired, reinforced, or reclaimed. Drainage elements, such as berms, check dams, drains, riprap, gabions or culverts, could be repaired, redirected, relocated, or installed. A site-specific National Pollutant Discharge Elimination System (NPDES) Storm Water Pollution Prevention (SWPP) Plan would be prepared, and a Notice of Intent (NOI) would be filed under the NPDES General Permit for construction activities, if necessary.

Some removal of individual trees and bushes along trails may occur during trail maintenance activities, such as the removal of damaged, dead, or so-called "hazard" trees. Additionally, some vegetation may be removed from small areas when these are cleared to enlarge existing or to construct new trailhead vehicle parking accommodations. Vegetation may also be selectively removed along new trail reaches as the construction of new trails occurred.

Repair and construction work would be planned, managed, and performed to ensure that standard worker safety goals are met and that work would be performed in accordance with good management practices, regulations promulgated by the Occupational Safety and Health Administration, and LANL resource management plans, including the Wildfire Hazard Reduction Program. To prevent serious work-related injuries, all site workers would be required to adhere to a construction safety and health plan reviewed by LANL staff before construction activities begin. Various DOE orders involving worker and site safety practices and environmental regulations and other laws may also apply. Engineering BMPs would also be employed.

2.1.3 Environmental Protection Measures

Integral to repair and construction measures for the Trails Management Program would be complementary measures to protect and enhance cultural and natural resources. The various environmental protection measures are discussed in more detail here. For any single project it would be unlikely that all the measures would be employed at the same time, but a single project may well use multiple protective measures to complement the chosen treatment measure(s).

Cultural Resources Protection Measures. The planning process would include the identification, as necessary, of cultural resources present along and near each trail and consideration of the historic significance of the trails. This identification process would include consultation with the four Accord Pueblos regarding the potential presence of TCPs and other traditionally or culturally sensitive areas as identified by these communities. Protective measures could include the following:

Repairs and Maintenance. Cultural resources would be avoided to the maximum extent practicable and may involve construction (or reconstruction) of trails (or segments of trails) around cultural resources (with the original trail being reclaimed in the case of existing trails). The perimeter of identified cultural features would be marked with flagging tape, or pin flags, or both. These sites would be field checked by trained archeologists with the repair or construction crews before field activities commence. If construction was necessary within an identified cultural resource feature, construction crews would be limited to performing work by hand. No tree cutting, piling, or dragging of materials across the surface of a cultural site would be permitted. The SHPO would be consulted as necessary, depending on the nature of the repair and maintenance.

Trail Construction. New trail alignments and ancillary drainage features would be planned to avoid cultural resources, including any TCPs. Cultural resources located near trail alignments would be identified with flagging tape, or pin flags, or both, to avoid inadvertent damage by equipment or personnel. These resources may also be fenced. Identification and protection measures would be removed following treatment activities to prevent the identification of the cultural resource and reduce the potential for vandalism.

Threatened and Endangered Species Protection Measures. The presence of threatened and endangered species and their potential or occupied habitats would be trail planning considerations. There are three Federal listed species that currently use LANL areas as habitat– the bald eagle (*Haliaeetus leucocephalus*), Mexican spotted owl (*Strix occidentalis lucida*), and the southwestern willow flycatcher *(Empidonax traillii extimus*). All features of planned trail actions and use would be developed and implemented in accordance with guidance and restrictions contained in the LANL Threatened and Endangered Species Habitat Management

Plan (LANL 1998) or developed in compliance with the ESA, and other pertinent laws and regulations.

Surface Water Quality Protection Measures. Trail-related environmental protection measures for avoiding potential adverse consequences to surface water quality would include the following:

- Pursuant to NPDES General Permit requirements for preconstruction activities, a SWPP Plan would be developed and implemented for trail projects and an NOI would be filed if required.
- Severely disturbed or denuded areas would be revegetated. Revegetation measures would use native species appropriate for the associated plant community.
- Storm water control structures would be constructed along trails as needed. These could include straw bales or log check dams during construction and repair and culverts, ditches, riprap, check dams, and similar permanent structures.
- Channel stabilization measures would be employed along trails as needed.
- Hand-held equipment would generally be used along trails to reduce the potential for erosion. Vehicular equipment would not be used in areas with slopes of greater than 30 percent, or on single-tread trails.
- Heavy machinery and vehicles would not be used during saturated soil conditions.
- Any new trail access roads would be constructed on slopes of less than 10 percent with bar ditches and turnouts, as appropriate.

2.1.4 Safety Measures

Safety measures would be put in place during trail repair, maintenance, and construction for worker and public protection and also when the trails are open for routine use.

Worker Protection and Health and Safety Measures. The following measures would be employed for the health and safety of trails workers:

- Trails workers would wear personal protective equipment suitable for the conditions of any given trail project.
- Trails workers would be appropriately trained when working in or near PRSs, radiological areas, and other hazardous areas.
- Access to trails being repaired or under construction would be restricted to involved personnel.
- Additional health and safety measures would be developed specific to site conditions as necessary.

Public Safety Measures. The following measures would be employed for public safety on LANL trails:

- Signs would be posted at trailheads declaring the rules and cautions for trail use. Signs prohibiting use would be placed at closed trailheads. Signs would have consistent appearance and be posted where they would be obvious pursuant to LANL Wayfinding design standards. Signs would list emergency phone numbers. Trail markers would be

placed along trails to be visible but not obtrusive. Appropriate signs would be used to preclude unauthorized public access during temporary trail closures.

- Physical barriers would be placed at trailheads or along trails to preclude inappropriate uses while permitting entry for intended users. These might employ structural or natural elements such as fences and gates, logs, or large rocks. In some cases, trails could be limited to specific uses such as only for walking or bicycling.
- Trail users on more remote trails not used for commuting purposes could be requested to sign in at the trailhead.
- Overnight use, smoking, camping, or campfires would not be allowed within LANL. Weapons, explosives, and other materials likely to cause substantial injury or damage to persons or property would not be permitted; nor would alcoholic beverages, controlled substances, lighters, or incendiary devices.
- Certain trails could be appropriate for equestrian use or for dog exercise or training use; access to these trails would be suitably provided and the trails would be appropriately posted. Other trails could be posted informing users that horses or dogs would not be permitted and trail access would exclude horses or dogs accordingly.
- Unauthorized motorized vehicles, including all terrain vehicles, scooters, mopeds, and motorcycles, would be prevented from using any trail within LANL boundaries.
- In order to minimize impacts to traffic, proper sizing and design of parking and gathering areas would consider ingress and egress from adjacent roads. Specific needs and designs would be assessed in the planning phase prior to construction to ensure minimal disturbance of traffic in critical areas.

2.1.5 Security Measures

The Trails Management Program cannot compromise LANL security. The following passive and active security measures would be incorporated into the Trails Management Program:

- Sign and fencing upgrades would be made around LANL.
- Signs would indicate where access is permitted and the use rules that apply. Other signs would prohibit entry to areas of LANL that are not publicly accessible.
- In certain instances, signs could preclude entry into areas that had previously been accessible by the general public.
- Fences could be installed in certain areas and at trailheads to help distinguish clearly those trails that would be open to the general public and those that would be closed to the general public.
- Security patrols would be enhanced contingent upon resources and funding. An interagency agreement could provide for enforcement (for example, by the National Park Service) based upon locations and the nature of the incursion or trespass.

2.1.6 End-State Conditions and Post-Repair or Post-Construction Assessment

The successful implementation of a Trails Management Program at LANL would be determined by assessing the achievement of resource goals and objectives listed in Section 2.1. A key

element of the Trails Management Program would be post-repair or post-construction assessments. This also refers to instances when a trail would be obliterated and closed. Field assessments would be conducted to monitor the effectiveness of measures undertaken to achieve the desired goals, the need to modify the measures used, and to help develop future management or repair strategies. The majority of post-repair or post-construction assessments would be conducted in the field. At a minimum, all trail projects would incorporate an end-state condition assessment. The following activities would compose the post-repair or post-construction assessments:

Cultural and Ecological Field Studies. Cultural and ecological studies are important tools for assessing the effects of employed protection measures on cultural resource sites and on the local fauna and flora. Based on need and funding, post-treatment studies would be initiated for archeological sites, historical sites, TCPs, threatened and endangered species and their habitat, large and small mammals, arthropods, birds, reptiles, amphibians, bio-contaminant availability, contaminant movement, and vegetation changes.

Field surveys for archeological and historical sites, as well as wildlife, and the vegetative characteristics of forests and woodlands are currently being conducted in the Los Alamos region. The results of these quantitative surveys are being used to develop cultural resources inventories, plant community classifications, and a more complete understanding of wildlife movements and populations in order to relate these classes to their respective environmental and topographic conditions. Information about the location and types of cultural resources present at LANL are useful to facilitate their protection from future activities or their restoration. Some of this information is protected under Federal and State of New Mexico regulations and laws and is not publicly available.

Watershed Assessment and Monitoring. The trail projects may require the development of a SWPP Plan per NPDES permit requirements. The SWPP Plan would list BMPs for monitoring and protecting watersheds for trails maintenance and use. Part of the monitoring program could be linked to the existing water-sediment discharge sampling station network located throughout the major drainages at LANL.

Damages Assessment. Trails would be monitored periodically for damage and treatments would be assessed to determine their effectiveness.

Health and Safety Assessment. Post-repair and post-construction trails assessments would be used to monitor and evaluate health and safety conditions, incidents, and occurrences.

Security Assessment. Security occurrences would be tracked for each trail and for the trail system to determine whether certain trails posed enforcement problems such as trespassing onto Pueblo lands or serious vulnerabilities to LANL operations.

2.2 Trails Closure Alternative

This alternative would result in the closing of all existing social trails to the general public and to LANL workers for recreational use purposes. Most LANL trails would be closed and reclaimed. Workers at LANL and officially invited guests engaged in official work and permitted activities would be allowed to continue using certain designated trails based upon the assessments and measures discussed previously in Section 2.1. DOE's American Indian Tribal Government Policy would be used to guide consultations with neighboring Pueblos in matters regarding trails closure. Trails designated for closure would be rendered inaccessible and undesirable by a

combination of physical barriers, enhanced security patrols, and penalties for trespassing. The closing of trails could include some of the components of repair and construction measures, environmental protection measures, safety measures, and security measures, as well as end-state conditions as described in Section 2.1 for the Proposed Action. Signs and fencing or manufactured or natural barriers might be installed to close off trails to future use. Trail beds and segments could be removed and restored to more natural conditions. Drainage elements, such as berms, check dams, drains, riprap, gabions, or culverts, could be repaired or installed to remediate closed trails. Cultural resources located near a trail being closed would be identified to avoid inadvertent damage by remediation equipment or personnel. Protection measures would be removed following treatment activities to prevent the identification of the cultural resource and potential for vandalism. Trail closures would be implemented in accordance with guidance and restrictions contained in the LANL Threatened and Endangered Species Habitat Management Plan (LANL 1998) or developed with further compliance with the ESA as necessary. Severely disturbed or denuded areas would be revegetated, and revegetation measures would use native species appropriate for the associated plant community. Trail workers would wear personal protective equipment suitable for the conditions of any given trail closure project. Trail workers would be appropriately trained when working in or near PRSs, radiological areas, and other hazardous areas, and access to trails being repaired or under construction would be restricted to involved personnel. Security patrols would be used according to need and budget. Post-closure field assessments would be performed.

2.3 No Action Alternative

The No Action Alternative describes existing conditions and serves as a baseline for comparing the potential environmental effects of the Proposed Action. It must be considered even if DOE is under a court order or legislative command to act (10 CFR 1021). Under this alternative, the existing social trails at LANL would continue to deteriorate and repairs would not be regularly performed. Over time, some trails may be closed for safety or security reasons. Closed trails would not be reclaimed or maintained. Limited repairs would continue to be made without an overall prioritization and without coordinating with adjacent landowners, Federal agencies, or tribal governments. New social trails would continue to be created. There would be no trails assessment, planning, or management process, nor would efforts to coordinate trails management with other jurisdictions occur. Signs, fencing, parking, and other trail-related improvements would not be made. Trespassing (both intentional and inadvertent) onto areas at LANL that are not intended for public access via unchecked trail use would continue with uneven enforcement. LANL operational and security concerns affected by trails would continue to be addressed on an incremental and uncoordinated basis.

2.4 Alternatives Considered but Dismissed

2.4.1 Open All Existing Trails at LANL for Unrestricted Recreational Use

Opening all existing trails at LANL to the public for unrestricted recreational use would be inconsistent with the primary mission assigned to NNSA by Congress. Trails management objectives would not be met by opening all existing trails at LANL to unrestricted recreational uses; such an action would compromise certain environmental and cultural resources, public health and safety, LANL security perimeters, and, ultimately, it would compromise LANL national security operations. This alternative was not analyzed further in this EA.

2.4.2 Individual Specific Trails for Repair or Closure (non-programmatic)

Another alternative that was considered during scoping this EA was to review individual trails at LANL and to make specific recommendations for a proposed action based upon an analysis of affected resources. This alternative was not considered further because it was not considered to be as effective over the long-term as the Proposed Action (establishing a Trails Management Program). Specifically, the Proposed Action establishes an ongoing program; such a program would allow for greater flexibility as laws, rules, regulations, DOE orders, and national and local conditions change. Considering specific individual trails with the intent of performing one-time maintenance or closing some of them was therefore not analyzed in this EA.

2.5 Related NEPA Actions and Documents

2.5.1 Final Site-Wide Environmental Impact Statement (SWEIS)

The Final LANL Site-Wide Environmental Impact Statement (SWEIS) (DOE 1999a), dated January 1999, was issued in February of that year. A Record of Decision (ROD) was issued in September 1999, and a Mitigation Action Plan was issued in October 1999. The SWEIS considered ecological, natural, and cultural resources at LANL and analyzed how they would be impacted by four alternative operating scenarios, but it did not specifically address trail use. This EA tiers from the SWEIS.

The SWEIS Mitigation Action Plan also establishes a commitment to develop and implement a Natural Resources Management Plan. The Natural Resources Management Plan would be used to effectively "manage natural resources in a fashion that directly supports DOE's Land and Facility Use Planning Policy by integrating mission, economic, ecological, social, and cultural factors into a comprehensive process for guiding land and facility use decisions at LANL" (DOE 1999a). In September 2002, NNSA issued the *Integrated Natural and Cultural Resources Management Plan* (IRMP) for LANL. The IRMP provides the conceptual framework for developing and implementing a Trails Management Program as part of appropriate management of natural and cultural resources at LANL.

2.5.2 Final Environmental Impact Statement for the Conveyance and Transfer of Certain Land Tracts Administered by the U.S. Department of Energy and Located at Los Alamos National Laboratory, Los Alamos and Santa Fe Counties, New Mexico (C&T EIS)

On November 26, 1997, Congress passed PL 105-119, the *Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act*, 1998 (42 USC 2391). Section 632 of the Act directs the Secretary of Energy to convey to the Incorporated County of Los Alamos, New Mexico, or to the designee of Los Alamos County, and to transfer to the Secretary of the Interior, in trust for the Pueblo of San Ildefonso, parcels of land under the jurisdictional administrative control of the Secretary at or in the vicinity of LANL that meet certain identified criteria. A ROD for this action was issued in December 1999. DOE prepared the C&T EIS (DOE 1999b) to examine potential environmental impacts associated with the conveyance or transfer of each of the land parcels tentatively identified in the DOE's *Land Transfer Report to Congress Under Public Law 105-119, A Preliminary Identification of Parcels of Land in Los Alamos, New Mexico, for Conveyance or Transfer* (DOE 1998). Trail use was a concern considered in the C&T EIS analysis because changing the jurisdictions for some of the social trails could result in changes to how they are managed, or if they would remain open for

public use. Trails on lands conveyed or transferred would not be included in the Trails Management Program.

2.5.3 Special Environmental Analysis–Cerro Grande Fire

NNSA prepared a special environmental analysis (DOE 2000a) that documents its assessment of impacts associated with emergency activities conducted at LANL in response to major disaster conditions caused by the Cerro Grande Fire. NNSA would normally have prepared an EIS in compliance with NEPA to analyze potentially significant beneficial or adverse impacts that could occur if a proposed action was implemented. However, because of the urgent nature of the actions required to address the effects of the Cerro Grande Fire as it burned over LANL and the need for immediate post-fire recovery and protective actions, NNSA had to act immediately and was therefore unable to comply with NEPA in the usual manner. NNSA invoked the CEQ's emergencies provision of its NEPA Implementing Regulations (40 CFR 1500-1508) and the emergency circumstances provision of DOE's NEPA Implementing Regulations (10 CFR 1021). Pursuant to those provisions, NNSA consulted with CEQ about alternative arrangements for NEPA compliance for its emergency action. Consistent with agreements reached during those consultations, NNSA prepared the DOE/SEA-03 (DOE 2000a) of known and potential impacts from wildfire suppression, post-fire recovery, and flood control actions. The DOE/SEA-03 can be found in DOE Reading Rooms in Albuquerque (at the Government Information Department, Zimmerman Library, University of New Mexico), and in Los Alamos (at the Community Relations Office located at 1619 Central Avenue). Trail use was affected by the Cerro Grande Fire and the remediation that followed.

2.5.4 Wildfire Hazard Reduction and Forest Health Improvement Program at Los Alamos National Laboratory

This EA was completed in August 2000, just two months after the Cerro Grande Fire, and analyzed alternatives for implementing a Wildfire Hazard Reduction and Forest Health Improvement Program at LANL that would not use fire as a treatment measure. This ecosystem-based management program, which was implemented immediately, is a series of individual, small-scale projects using mechanical and manual thinning methods that includes ongoing, long-term maintenance projects. Following the Cerro Grande Fire, LANL implemented an aggressive forest-thinning project to address the immediate threat of wildfire to the site. As a result, an estimated 30 percent, approximately 7,500 acres (ac) (3,035 hectares [ha]), of LANL has been treated under this program using forest thinning and the construction of access roads and fuel breaks as treatment measures. Some of the trails subject to a Trails Management Program traverse these treated areas.

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3.0 Affected Environment

This section describes the natural and human environment that could be affected by the Proposed Action, the General Public Trails Closure Alternative, and the No Action Alternative. The potential environmental consequences of those actions are presented in Section 4. Environmental issues are identified and addressed based on the "Sliding Scale Approach" discussed earlier in this EA (Subsection 1.4). Table 2 identifies the subsections in Sections 3 and 4 where potential environmental issues are discussed and notes those issues that are not affected by the Proposed Action.

Table 2. Potential Environmental Issues

Environmental Category	Applicability	Subsections
Socioeconomics	Yes	3.1, 4.1
Ecological Resources (biological resources and wetlands)	Yes	3.2, 4.2
Cultural Resources	Yes	3.3, 4.3
Water Quality	Yes	3.4, 4.4
Environmental Restoration	Yes	3.5, 4.5
Transportation, Traffic, and Infrastructure	Yes	3.6, 4.6
Health and Safety	Yes	3.7, 4.7
Environmental Justice	Yes	3.8, 4.8
Geology and Soils	Yes	3.9, 4.9
Waste Management	Yes	3.10, 4.10
Air Quality	Yes	3.11, 4.11
Noise	Yes	3.12, 4.12
Visual Resources	The Proposed Action, the Trails Closure Alternative, and the No Action Alternative would not affect visual resources.	NA
Land Use	The Proposed Action, the Trails Closure Alternative, and the No Action Alternative would not alter current land use designations at LANL.	NA

The Proposed Action would be implemented within the area of Los Alamos County that includes LANL. LANL comprises a large portion of Los Alamos County and extends into Santa Fe County. LANL is situated on the Pajarito Plateau along the eastern flank of the Jemez Mountains and consists of 49 technical areas spread out over 40 mi^2 (104 km^2). The Pajarito Plateau slopes downward towards the Rio Grande along the eastern edge of LANL and contains several fingerlike mesa tops separated by relatively narrow and deep canyons that are prone to flooding.

Commercial and residential development in Los Alamos County is confined primarily to several mesa tops lying north of the core LANL development, in the case of the Los Alamos town site, or southeast, in the case of the communities of White Rock and Pajarito Acres. Approximately 12 percent of the land in Los Alamos County is privately held. The lands surrounding Los Alamos County are largely undeveloped wooded areas with large tracts located to the north, west, and south of LANL that are administered by the Department of Agriculture, Santa Fe National Forest, and by the U.S. Department of the Interior (DOI), National Park Service, Bandelier National Monument. Lands to the east of LANL are administered by the DOI, Bureau of Land Management or San Ildefonso Pueblo.

Detailed descriptions of LANL's natural resources environment, cultural resources, socioeconomic, waste management, regulatory compliance record, and general operations are described in detail in the SWEIS (DOE 1999a). Additional information is available in the most recent annual Environmental Surveillance Report (LANL 2001a) and the *Special Environmental Analysis for the Department of Energy, National Nuclear Security Administration, Actions taken in Response to the Cerro Grande Fire at Los Alamos National Laboratory, Los Alamos, New Mexico* (DOE 2000a). These documents are available at the Public Reading Room at 1619 Central Avenue, Los Alamos, New Mexico.

3.1 Socioeconomics

About 20,000 people live in Los Alamos County and another 6,000 or so commute to work there. Bandelier National Monument had nearly 300,000 visitors in 2002. Tourism in Los Alamos County, although not a major component of the local economy, is nonetheless very important to businesses that derive trade from it. Outdoor recreation is a significant component of tourism activity in Los Alamos County and adjacent counties. Trail access contributes in other ways to the local economy through contribution to overall quality of place. Outdoor recreational opportunity is an important component of what makes living in Los Alamos attractive to prospective residents and employees of LANL and other employers. The Los Alamos area is home to several active volunteer search and rescue teams that provide important emergency services throughout the state. Canine search teams, equestrian mounted search personnel, communications, high angle rescue and medical teams contribute to the overall safety and security of state citizens. These teams and groups use LANL area trails for training and testing purposes. Several hundred miles of trails and unimproved roads traverse the Jemez Mountains, of which the Pajarito Plateau is a small part. The new Valles Caldera National Preserve will also draw visitors from the region and the nation.

LANL and Los Alamos County operations have a notable and positive influence on the economy of north-central New Mexico. Specifically, in FY01 (the latest year for which such information is available) LANL had an operating budget that was $1.667 billion and a total workforce of 13,570. Salaries and benefits accounted for $880 million. This translated into a $3.8 billion impact on the tri-county region that includes Los Alamos, Santa Fe, and Rio Arriba Counties. In effect, nearly one of every three jobs in the tri-county region was created or supported by LANL FY01 procurements in northern New Mexico which were $357 million (LANL 2002). Approximately 80 percent of the jobs created indirectly by LANL in the region occurred in the trade, finance, insurance, real estate, and services sectors (DOE 1999a). The FY03 budget for Los Alamos County proposed $205.5 million in expenditures, predominantly for operations and labor costs (LAC 2003).

One of the beneficial results of being home to LANL is that Los Alamos County has one of the highest median household incomes in the nation at $78,993 according to the 2000 Census. Families living below the poverty level in Los Alamos County accounted for just 1.9 percent of all families. This compares with a median household income of $34,133 for the State of New Mexico, which has 14.5 percent of all families living below the poverty level (USCB 2000a). Nearly 95 percent of a total of 7,937 housing units were occupied in Los Alamos County, and 79 percent of the total units were owner-occupied. The rental vacancy rate was about 11 percent as reported in the 2000 Census (USCB 2000b).

3.2 Ecological Resources

Biological resources include all plants and animals, with special emphasis on Federally listed threatened and endangered species protected by the ESA (16 USC 1531), and floodplains and wetlands. The Los Alamos region is biologically diverse. This diversity is due partly to the pronounced 5,000-ft (1,500-m) elevation gradient from the Rio Grande to the Jemez Mountains and partly to the many canyons that dissect the region. Five major vegetation cover types are found within LANL: juniper (*Juniperus monosperma* [Engelm.] Sarg.) savannas; piñon (*Pinus edulis* Engelm.) juniper woodlands; ponderosa pine (*Pinus ponderosa* P. & C. Lawson) forests, mixed conifer forests (Douglas fir [*Pseudotsuga menziesii* (Mirbel) Franco] ponderosa pine, white fir [*Abies concolor* (Gord. & Glend.) Lindl. ex Hildebr.], and grasslands. In addition, wetlands and riparian areas enrich the diversity of plant and animal life at LANL. The majority of the wetlands in the LANL region are associated with canyon stream channels or are present on mountains or mesas as isolated meadows often in association with springs or seeps. There are also some springs within White Rock Canyon.

Plant communities range from urban and suburban areas to grasslands, wetlands, shrubland, woodland, and mountain forest and provide habitat for a variety of animal life. Animal life includes herds of elk (*Cervus elaphus*) and deer (*Odocoileus hemionus)*, bear (*Ursus americanus)*, mountain lions (*Puma concolor)*, coyotes (*Canis latrans*), rodents, numerous species of bats, reptiles, amphibians, invertebrates, and a myriad of resident, seasonal, and migratory birds. In addition, Federally listed threatened and endangered species occur at LANL. Because of restricted access to certain LANL areas, lack of permitted hunting, and management of contiguous Bandelier National Monument and Forest Service lands for natural biological systems, much of the region functions as a refuge for wildlife.

The juniper savanna community type is found along the Rio Grande and extends upward on the south-facing sides of canyons at elevations between 6,200 and 5,200 ft (1,860 and 1,560 m). The piñon-juniper cover type occupies large portions of the mesa surfaces in the 6,000- to 6,200-ft (2,070- to 1,860-m) elevation range, as well as north-facing slopes at lower elevations. The piñon-juniper woodland community type is the dominant vegetation type of both the Pajarito Plateau and the Caja del Rio Plateau. Ponderosa pine forests are found in the western portion of the Pajarito Plateau in the 7,500- to 6,900- ft (2,250- to 2,070-m) elevation range.

Conifer forest mixed with aspen forest, at an elevation of 9,500 to 7,500 ft (2,850 to 2,250 m), intermix with the ponderosa pine forests in the deeper canyons and on the north slopes and extend from the higher mesas onto the slopes of the Jemez Mountains. Grasslands occur in the western and central region at LANL, generally in areas that have been previously burned or disturbed.

Wetlands are transitional lands between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. More than 95 percent of the identified wetlands at LANL are located in watersheds of the Sandia, Mortandad, Pajarito, and Water Canyons (DOE 1999c). Wetlands in the general LANL region provide habitat for reptiles, amphibians, and invertebrates (such as insects). Wetlands also provide habitat, food, and water for many common species such as deer, elk, small mammals, and many migratory birds and bats.

3.3 Cultural Resources

Cultural resources include any prehistoric sites, buildings, structures, districts, or other places or objects considered to be important to a culture or community for scientific, traditional, religious, or any other reason. They combine to form the human legacy for a particular place (DOE 1999a). To date, more than 2,000 archaeological sites and historic properties have been recorded at LANL.

The criteria used for evaluating cultural resources depends upon their significance as sites eligible for listing to the NRHP as described in the NHPA (16 USC 470). These determinations of significance are met by evaluating each cultural resource based on it meeting any one or more of the following criteria:

Criterion A — association with events that have made a significant contribution to the broad pattern of our history;

Criterion B — association with the lives of persons significant in our past;

Criterion C — illustration of a type, period, or method of construction; for its aesthetic values or for its representation of the work of a master; or if it represents a significant and distinguished entity whose components may lack individual distinction; and

Criterion D — it has yielded, or may be likely to yield, information important in prehistory or history.

Prehistoric resources at LANL refer to any material remains and items used or modified by people before the establishment of a European presence in the upper Rio Grande Valley in the early seventeenth century. Archaeological surveys have been conducted of approximately 90 percent of the land within LANL (with 85 percent of the area surveyed receiving 100 percent coverage) to identify the cultural resources. The majority of these surveys emphasized prehistoric Native American archaeological sites, including Pueblos, rock shelters, rock art, water control features, trails, and game traps. A total of 1,777 prehistoric sites have been recorded at LANL, of which 439 have been assessed for potential nomination to the NRHP. Of these, 379 sites were determined to be eligible, 60 sites ineligible, and two of undetermined status. The remaining 1,338 sites, which have not been assessed for nomination to the NRHP, are protected as eligible sites until assessed and their actual status is determined.

The Cerro Grande Fire directly affected 215 prehistoric sites. Effects to cultural resource sites included effects originating from burned-out tree root systems forming conduits for modern debris and water to mix with subsurface archaeological deposits and for entry by burrowing animals. Also, snags or dead or dying trees have fallen and uprooted artifacts (DOE 1999a). Areas at LANL burned by the Cerro Grande Fire have been surveyed for effects and mitigation measures have been implemented.

Historic resources present within LANL boundaries and on the Pajarito Plateau can be attributed to nine locally defined Periods: U.S. Territorial, Statehood, Homestead, Post Homestead, Historic Pueblo, Undetermined historic, Manhattan Project, Early Cold War, and Late Cold War. A total of 706 historic sites have been identified at LANL.

The Cerro Grande Fire directly affected 11 historic buildings and 56 historic sites. Structures and artifacts from the Homestead Period, Manhattan Project Period, and Cold War Period were adversely affected. The fire destroyed virtually all of the wooden buildings associated with the

Homestead Period, and the burned properties were largely reduced to rubble. V-Site, one of the last vestiges of the Manhattan Project Period remaining at Los Alamos, was the location where work was conducted on the Trinity device. This important historical site was partially destroyed by the fire (DOE 2000a).

3.4 Water Quality

Surface water at LANL occurs primarily as short-lived or intermittent reaches of streams. Perennial springs on the flanks of the Jemez Mountains supply base flow into the upper reaches of some canyons, but the volume is insufficient to maintain surface flows across LANL. Runoff from heavy thunderstorms or heavy snowmelt can reach the Rio Grande. Effluents from sanitary sewage, industrial water treatment plants, and cooling tower blow-down enter some canyons at rates sufficient to maintain surface flows for varying distances (DOE 1999a). Surface waters at LANL are monitored by LANL and the New Mexico Environment Department (NMED) to survey the environmental effects of LANL operations. Planned releases from industrial and sanitary wastewater facilities within LANL boundaries are controlled by NPDES permits.

Data and analysis of LANL surface and groundwater quality samples taken from test wells indicate that LANL operations and activities have affected the surface water within LANL boundaries and some of the alluvial and intermediate perched zones in the LANL region. Details on the surface and groundwater quality can be found in the annual LANL Environmental Surveillance Report (LANL 2001a).

3.5 Environmental Restoration

DOE and LANL are jointly responsible for implementing the DOE Environmental Restoration (ER) Project at LANL. The ER Project is governed primarily by the corrective action process prescribed in the *Resource Conservation and Recovery Act* (RCRA), but it is also subject to LANL policies and to other applicable laws and regulations. The NMED administers RCRA in New Mexico. DOE, through the Los Alamos Site Office, conducts site characterization and waste cleanup (corrective action) activities at PRSs at LANL. Site characterization and cleanup are needed to reduce risk to human health and the environment posed by potential releases of contaminants at ER Project sites.

PRSs at LANL include septic tanks and lines, chemical storage areas, wastewater outfalls (the area below a pipe that drains wastewater), material disposal areas (landfills), incinerators, firing ranges and their impact areas, surface spills, and electric transformers. PRSs are found on mesa tops, in material disposal areas, in canyons, and in a few areas in the Los Alamos town site.

The primary means of contaminant release from these sites are surface water runoff carrying potentially contaminated sediments and soil erosion exposing buried contaminants. The main pathways by which released contaminants can migrate are infiltration into alluvial aquifers, airborne dispersion of particulate matter, and sediment migration from surface runoff. The contaminants involved include volatile organic compounds, semivolatile organic compounds, polychlorinated biphenyls, asbestos, pesticides, heavy metals, beryllium, radionuclides, petroleum products, and high explosives (HE). The 1999 LANL SWEIS (DOE 1999a) contains additional information on contaminants.

3.6 Transportation, Traffic, and Infrastructure

LANL is situated on approximately 25,000 ac (10,000 ha) of land administered by NNSA. Only about 30 percent of this land is developable and suitable for research and development and office facilities, because of topographic, environmental, operational, and buffering constraints. Utility systems at LANL include electrical service, natural gas, telecommunications, steam, water, sanitary sewer, and a radioactive liquid waste system. Section 4.10 of the 1999 LANL SWEIS (DOE 1999a) describes transportation services at LANL. The impacts on transportation in and around LANL under the Preferred Alternative selected in the SWEIS ROD are described in detail in Section 5.3.10 of the SWEIS. Regional and site transportation routes including East and West Jemez Roads, Pajarito Road, and SR 4, are the primary conduits used to transport LANL-affiliated employees, commercial shipments, and hazardous and radioactive material shipments. There are sidewalks in the more developed LANL technical areas and walkways and pathways that link technical areas to one another. Some LANL workers and visitors use the network of social trails to travel to and from the town site and between LANL technical areas. Bladed (unpaved) fire roads are located in many areas of LANL and some are used as walking paths and access roads for maintaining utility services. Some trails begin at, follow, or intersect vehicle transportation routes and utility corridors. However, users of LANL trails sometimes park vehicles adjacent to trail entrances and alongside roads. These areas have typically not been designed for parking and are not improved parking sites.

3.7 Health and Safety

The health and safety setting for trail maintenance workers and users at LANL can vary depending upon the condition and location of each trail. Some of LANL's trails traverse remote and undeveloped locations that pose particular human health and safety risks. There are risks associated with human encounters with wildlife and physical hazards such as steep slopes, falling tree limbs, rockslides, and inclement weather conditions. These factors could affect trail maintenance workers and recreational users. In addition, there are potential chemical and radiological hazards from PRSs and radiological or HE operations at LANL. PRSs may contain hazardous materials, HE, and radioactive materials in small amounts that pose minimal threats to trail users. Hazardous operations occur across LANL and in proximity to some trails. These operations could pose radiation, chemical, and explosive hazards to trail users. Areas with operational hazards and human health and exposure risks are generally marked with signs, are announced through sirens or other alerts, or are conducted in security areas with restricted access and barriers.

Workers involved in trail development and maintenance are generally considered to be in good health. They also receive training in emergency preparedness and response and the proper use of hazardous equipment in outdoor settings. Trail users would generally be people that are also in good health and knowledgeable about potential outdoor hazards but may not be familiar with LANL operational hazards.

3.8 Environmental Justice

Presidential Executive Order 12898 (EO 12898) requires that Federal agencies consider environmental justice when complying with NEPA. Environmental justice is concerned with possible disproportionately adverse health and socioeconomic effects of proposed Federal actions on minority and low-income populations. Communities with people of color, exclusive

of white non-Hispanics, and low-income households earning less than $15,000 per year, must be identified and considered by DOE when preparing an EA. About 54 percent of the population is of minority status within a 50-mi (80-km) radius of LANL while 24 percent of the households have annual incomes below $15,000. The New Mexico median household income in 2000 was $34,133 (USCB 2000a). Los Alamos County has a higher median family income and a much lower percentage of minority residents than the four surrounding counties, being approximately 18 percent minority (the percentage of non-whites, including Hispanics, defined by the US Census) and having a median household money income of $78,993 (USCB 2000b).

The Pueblo of San Ildefonso is adjacent to Los Alamos County and LANL and meets the environmental justice criteria for minority (Native American) populations; however, the median household income was $30,457 in 2000, while 12.4 percent of the families at the Pueblo were below the poverty level. The three other nearby Accord Pueblos of Santa Clara, Cochiti, and Jemez have median household incomes of $30,946, $35,500, and $28,889, respectively, and 16.4 percent, 13.2 percent, and 27.2 percent, respectively, of the families live below the poverty level at these three Pueblos. Pojoaque Pueblo, also located near LANL, has a median household income of $34,256, and 11.3 percent of families there live below the poverty level (USCB 2000c).

3.9 Soils and Geology

Several distinct soil types have developed at LANL as a result of interaction between the bedrock, topography, and local climate. Mesa-top soils on the Pajarito Plateau include series that are well drained and range from very shallow 0 to 1 inch (in.) (0 to 25 centimeters [cm]) to moderately deep 2 to 4 in. (51 to 102 cm). The geochemistry, geomorphology, and formation of soils at LANL have been characterized and surveyed. Soil erosion rates vary considerably on the mesa tops at LANL, with the highest rates occurring in drainage channels and areas of steep slopes. The lowest rates tend to occur on gently sloping portions of the mesa tops away from channels. Studies at Bandelier National Monument indicate that erosion rates are high across widespread portions of local piñon-juniper woodlands that predominate in the eastern areas of LANL. Areas where runoff is concentrated by roads and other structures (such as trails if they aren't properly located, constructed, and maintained) are especially prone to high erosion rates. Even light summer rainstorms have resulted in erosion exceeding 12 tons (10.9 tons metric) per acre. Soil erosion can have serious consequences to the maintenance of biological communities and may also be a mechanism for moving contaminants across LANL and off site (DOE 1999a).

LANL is part of the Jemez Mountains volcanic field (JMVF) located at the intersection of the western margin of the Rio Grande Rift and the Jemez Lineament (Gardner et al. 1986, Heiken et al. 1996). The Jemez Lineament is a northeast-southwest-trending alignment of young volcanic fields ranging from the Springerville volcanic field in east-central Arizona to the Raton volcanic field of northeastern New Mexico (Heiken et al. 1996). The JMVF is the largest volcanic center along this lineament (LANL 1992). Volcanism in the JMVF spans a roughly 16-million-year period beginning with the eruptions of numerous basaltic lava flows. Various other eruptions of basaltic, rhyolitic, and intermediate composition lavas and ash flows occurred sporadically during the next 15 million years with volcanic activity culminating in the eruption of the rhyolitic Bandelier Tuff 1.79 and 1.23 million years ago (Self and Sykes 1996). Most of the bedrock on LANL property is composed of the salmon-colored Bandelier Tuff.

The geologic structure of the LANL area is dominated by the north-trending Pajarito Fault system. The Pajarito Fault system consists of three major fault zones (Pajarito, Guaje Mountain, and Rendija Canyon fault zones) and numerous secondary faults with vertical displacements ranging from 80 to 400 ft (24 to 120 m). Estimates of the timing of the most recent surface rupturing paleoearthquakes along this fault range from 3,000 to 24,000 years ago (LANL 2001b, 1999). Although large uncertainties exist, an earthquake with a Richter magnitude of 6 is estimated to occur once every 4,000 years; an earthquake of magnitude 7 is estimated to occur once every 100,000 years (DOE 1999a).

3.10 Waste Management

LANL generates solid waste[6] from construction, demolition, and facility operations. These wastes are managed and disposed of at appropriate solid waste facilities. Both LANL and Los Alamos County use the same solid waste landfill located within LANL boundaries. The Los Alamos County Landfill also accepts solid waste from other neighboring communities. The Los Alamos County Landfill receives about 52 tons per day (47 metric tons per day), with LANL contributing about 8 tons per day (7 metric tons per day), or about 15 percent of the total. The current Los Alamos County Landfill is scheduled to close in about 2007; the identification of a replacement disposal facility and other waste management options are currently being investigated.

Building debris storage yards on Sigma Mesa (TA-60) or other approved material management areas are used at LANL to store concrete rubble, soil, and asphalt debris for future use at LANL. Low-level radioactive waste is disposed of at LANL, TA-54, Area G, or is shipped offsite to appropriate permitted facilities. Hazardous waste[7] regulated under RCRA is transported to TA-54 at LANL for proper management, which is carried out in accordance with applicable laws, regulations, and DOE Orders. Hazardous wastes and mixed wastes both are treated and disposed of offsite since LANL has no onsite disposal capability for these waste types. The offsite disposal locations are located across the U.S. and are audited for regulatory compliance before being used for LANL waste disposal.

3.11 Air Quality

Air quality is a measure of the amount and distribution of potentially harmful pollutants in ambient air[8]. Air surveillance at Los Alamos includes monitoring emissions to determine the air quality effects of LANL operations. LANL staff calculates annual actual LANL emissions of regulated air pollutants and reports the results annually to the NMED. The ambient air quality in

[6] Solid waste, as defined in the Code of Federal Regulations (40 CFR 261.2) and in the New Mexico Administrative Code (20 NMAC 9.1), is any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility, and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities.

[7] Hazardous waste, as defined in 40 CFR 261.3, which addresses RCRA regulations, and by reference in 20 NMAC 4.1, is waste that meets any of the following criteria: a) waste exhibits *any* of the four characteristics of a hazardous waste: ignitability, corrosivity, reactivity, or toxicity; b) waste is specifically *listed* as being hazardous in one of the four tables in Subpart D of the Code of Federal Regulations; c) waste is a mixture of a *listed* hazardous waste item and a nonhazardous waste; d) waste has been *declared* to be hazardous by the generator.

[8] Ambient air is defined in 40 CFR 50.1 as "that portion of the atmosphere external to buildings, to which the public has access." It is defined in the New Mexico Administrative Code Title 20, chapter 2, part 72, as "the outdoor atmosphere, but does not include the area entirely within the boundaries of the industrial or manufacturing property within which the air contaminants are or may be emitted and public access is restricted within such boundaries."

and around LANL meets all U.S. Environmental Protection Agency (EPA) and DOE standards for protecting the public and workers (LANL 2001a).

LANL is a major source of air emissions (source that has the potential to emit more than 100 tons per year of certain nonradioactive substances) under the State of New Mexico Operating Permit program. Specifically, LANL is a major source of nitrogen oxides, emitted primarily from the TA-03 steam plant boilers. Combustion units are the primary point sources of criteria pollutants (nitrogen oxides, sulfur oxides, particulate matter, carbon monoxide, and volatile organic compounds) emitted at LANL.

Mobile sources, such as automobiles and construction vehicles, are additional sources of air emissions; however, mobile sources are not regulated by NMED. Diesel emissions from conveyance vehicles are not regulated as stationary sources of emissions. Mechanical equipment including bulldozers, excavators, backhoes, side booms, tamper compactors, trenchers, and drill rigs are exempt from permitting under Title 20 of the New Mexico Administrative Code Part 2.72, *Construction Permits*. This type of exemption does not require notification to NMED.

Both EPA and NMED regulate nonradioactive air emissions. NMED does not regulate dust from excavation or construction, but LANL employees take appropriate steps to control fugitive dust and particulate emissions during construction activities. Best Achievable Control Measures such as the use of water sprays or soil tacifiers are used to reduce fugitive dust emissions from cleared areas. Excavation and construction activities are not considered stationary sources of regulated air pollutants under the New Mexico air quality requirements; these activities are not subject to permitting under 20 NMAC, Parts 2.70 and 2.72. Annual dust emissions from daily windblown dust are generally higher than short-term, construction-related dust emissions. LANL would ensure that the New Mexico Ambient Air Quality Standards (NMAAQS) and the National Ambient Air Quality Standards (NAAQS) for particulate emissions are met throughout any construction activities.

3.12 Noise

Noise is defined as unwanted sound. Noise is categorized into two types: *continuous noise*, which is characterized as longer duration and lower intensity, such as a running motor, and *impulsive* or *impact noise*, which is characterized by short duration and high intensity, such as the detonation of HE. The intensity of sound is measured in decibel (dB) units and has been modified into an A-weighted frequency scale (dBA) for setting human auditory limits.

Noise measured at LANL is primarily from occupational exposures that generally take place inside buildings. Occupational exposures are compared against an established threshold limit value (TLV). The TLV is administratively defined as the sound level to which a worker may be exposed for a specific work period without probable adverse effects on hearing acuity. The TLV for continuous noise is 85 dBA for an 8-hour workday. The TLV for impulsive noise during an 8-hour workday is not fixed because the number of impulses allowed per day varies depending on the dBA of each impulse, however, no individual impulse should exceed 140 dBA. An action level (level of exposure to workplace noise that is below the TLV but the use of personal protective equipment is recommended) has been established for noise in the workplace at LANL. The action level for both continuous and impulsive noise is 82 dBA for an 8-hour workday.

Environmental noise levels at LANL are measured outside of buildings and away from routine operations. These sound levels are highly variable and are dependent on the generator. The

following are typical examples of sound levels (dBA) generated by barking dogs (58), sport events (74), nearby vehicle traffic (63), aircraft overhead (66), children playing (65), and birds chirping (54). Sources of environmental noise at LANL consist of background sound, vehicular traffic, routine operations, and periodic HE testing. Measurements of environmental noise in and around LANL facilities and operations average below 80 dBA.

The averages of measured values from limited ambient environmental sampling in Los Alamos County were found to be consistent with expected sound levels (55 dBA) for outdoors in residential areas. Background sound levels at the White Rock community ranged from 38 to 51 dBA (Burns 1995) and from 31 to 35 dBA at the entrance of Bandelier National Monument (Vigil 1995). The minimum and maximum values for the County ranged between 38 dBA and 96 dBA, respectively.

4.0 Environmental Consequences

This section describes the potential environmental consequences to the natural and human environment that could be affected by the Proposed Action, the Trails Closure Alternative, and the No Action Alternative. Table 3 provides a summary of the effects to resources and compares how they are affected by the Proposed Action, the Trails Closure Alternative, and the No Action Alternative.

Table 3. Comparison of Alternatives on Affected Resources

Affected Resource	Proposed Action: Trails Management Plan	Trails Closure Alternative	No Action Alternative
Socioeconomics	Would foster more balanced use of LANL trails while allowing some recreational use to continue	Would limit LANL trail use to workers at LANL and officially invited guests	LANL trails remain open without environmental, cultural, and operational protections
Ecological Resources (species, habitat, wetlands)	Certain trails would be closed at specific times to protect habitat and sensitive species. Negligible effects on some sensitive species	More trails would be closed all of the time. Negligible to slightly beneficial effects on most sensitive species	No trail closings or restrictions. Habitat degradation may slightly increase but no adverse effects to existing sensitive species
Cultural Resources	Enhanced protection of cultural resources	Enhanced protection of cultural resources	Cultural resources would continue to be damaged and destroyed
Water Quality	Negligible effect on surface water quality	Negligible effect on surface water quality	Slight adverse effects on surface water quality
Environmental Restoration	PRSs would be avoided by trail rerouting or closure	PRSs would be avoided by trail closure	PRSs would not be avoided—users possibly exposed to low levels of contamination
Transportation and Infrastructure	Some trails remain open to public. Limited effect on transportation or infrastructure	Most trails would close. Limited effect on transportation or infrastructure	All trails would remain open. No effect on transportation or infrastructure
Health and Safety	Minimal adverse effects	Minimal adverse effects	Minimal adverse effects
Environmental Justice	Would address some Pueblo concerns related to trail use	Would address most Pueblo concerns related to trail use	Would not address Pueblo concerns
Geology and Soils	Soil impacts minimized with BMPs and restoration	Soil impacts minimized due to trail closures and restoration	Soil degradation continues without BMPs or restoration
Waste Management	Could generate up to 120 cubic yards (yd^3) per year	Less wastes over time then Proposed Action	No additional wastes generated
Air Quality	Temporary and localized effects related to construction, maintenance, or closure	Temporary and localized effects related to construction, maintenance, or closure	No changes to ambient air quality
Noise	Limited short-term increases in noise levels from trail construction, repair, or closure	Limited short-term increases in noise levels from trail repair or closure	Ambient noise levels would remain unchanged

4.1 Socioeconomics

4.1.1 Proposed Action

The proposed Trails Management Program at LANL would not have a long-term effect on socioeconomic conditions in north-central New Mexico. There could be some short-term benefits derived from trail construction, maintenance, and closure activities. LANL workers or contractors who are part of the existing regional workforce would likely accomplish these tasks. Consequently, there would be no effect on local or regional population or an increase in the demand for housing or public services in Los Alamos or the region as a result of the Proposed Action. The proposed Trails Management Program would also address the concerns about trespassing onto adjacent San Ildefonso Pueblo lands and the concerns regarding cultural properties at LANL, while providing appropriate trail access to Los Alamos residents, workers at LANL, and officially invited guests.

The proposed Trails Management Program would address certain social concerns regarding visitor and local residential use of trails at LANL. Implementing the Proposed Action could result in the systematic closure of some trails at LANL; this action could in turn affect social recreational opportunities within LANL that are currently enjoyed by visitors to the LANL area and by residents of Los Alamos County alike. Loss of trail access would reduce perceptions of quality of place and likely result in a decrease in the attractiveness of Los Alamos as a place to live to current residents. This could contribute somewhat to an already difficult task of obtaining and retaining the highest quality workforce possible. LANL workers, tourists and visitors, and local residents that hike, ride horseback, bicycle, and otherwise use LANL trails could be excluded from engaging in these recreational activities along some trails within LANL and may, in turn, choose to shift their trail use onto neighboring lands. This shift in use of trails to those within the County of Los Alamos, Santa Fe National Forest, Bandelier National Monument, and on lands managed by the Bureau of Land Management could result in a correspondingly slight increase in the stresses placed on natural and cultural resources located within those lands. With this shift in trail user locations away from LANL, there would also likely be a slight increase in the number and location of unendorsed social trails created on those properties and also an increase in the incidence of trespassing onto private and Pueblo lands where recreational trail use has not been deemed appropriate. Over time, new trails might be created within LANL and this could result in some trail-use shifts back onto LANL land. New trails would likely be short in overall distance, and their locations would be carefully chosen to avoid or minimize adverse effects to all natural and cultural resources.

4.1.2 Trails Closure Alternative

The Trails Closure Alternative would not have a long-term effect on socioeconomic conditions in north-central New Mexico. There could be some short-term benefits derived from trail maintenance or closure activities. LANL workers or contractors who are part of the existing regional workforce would likely accomplish these tasks. Consequently, there would be no effect on local or regional population or an increase in the demand for housing or public services in Los Alamos or the region.

This alternative would address certain social concerns regarding visitor and local residential use of trails at LANL. Implementing the Trail Closure Alternative would result in the systematic closure of all trails at LANL to recreational users; this action would in turn affect social

recreational opportunities within LANL that are currently enjoyed by visitors to the LANL area and by residents of Los Alamos County alike. Loss of trail access would reduce perceptions of quality of place and likely result in a decrease in the attractiveness of Los Alamos as a place to live to current residents. This could contribute somewhat to an already difficult task of obtaining and retaining the highest quality workforce possible. LANL workers, tourists and visitors, and local residents that hike, ride horseback, bicycle, and otherwise use LANL trails would be excluded from engaging in these recreational activities along all trails within LANL and would likely choose to shift their trail use onto neighboring lands. This shift in use of trails to those within the County of Los Alamos, Santa Fe National Forest, Bandelier National Monument, and on lands managed by the Bureau of Land Management could result in a corresponding increase in the stresses placed on natural and cultural resources located within those lands. With this shift in trail-user locations away from LANL, there would also likely be an increase in the number and location of unendorsed social trails created on those properties and also an increase in the incidence of trespassing onto private and Pueblo lands where recreational trail use has not been deemed appropriate. No new LANL trail construction would be initiated under this alternative.

4.1.3 No Action Alternative

There would be no change to the socioeconomic condition of northern New Mexico if the No Action Alternative were implemented. Visitors to LANL, local area residents, and LANL workers could continue to use LANL trails for recreational purposes; no shift of trail use away from LANL onto neighboring lands would likely occur. New social trails would continue to be created at LANL in an ad hoc fashion.

4.2 Ecological Resources

4.2.1 Proposed Action

No long-term or permanent changes to ecological resources would be expected from implementing the Proposed Action with regard to existing trails. Short-term, temporary effects to animals that live along trail reaches could result from trail construction, maintenance, or closure activities. Small animals, including mammals, insects, and amphibians, occupying habitat areas along trail reaches could be temporarily displaced during trail caretaking activities; however, these species would be expected to return to the area as soon as work activities ended. In areas where trails were closed under this alternative, some increase in animal diversity might occur. Vegetation removal would be expected to be limited and would not likely affect the habitat along the trail reach.

Federally-listed threatened or endangered species, or other sensitive species currently present at LANL, would not likely be adversely affected, nor would their critical habitat be adversely affected, by activities associated with implementation of the Proposed Action. Trail maintenance work or work needed to permanently close a trail would be scheduled to accommodate the needs of identified sensitive species using habitat located along certain trail reaches as identified by the Threatened and Endangered Species Habitat Management Plan. Trails slated to remain available to recreational users would be chosen based on the ability of NNSA to adequately protect any sensitive species using habitat along those trails through the implementation of periodic trail closures or based on there being no identified sensitive species present to use potential habitat located along the trail reaches. As changes are made to the list of plants and animals protected under the ESA, the use of specific trails would need to be reassessed. Some sensitive species

may slightly benefit from some trail closures or limitations of trail users (hikers only) on a temporary or permanent basis. No new trails would be constructed in locations where existing sensitive species would be adversely affected. The overall effect of implementing the Proposed Action to most existing sensitive species would be expected to be negligible.

4.2.2 Trails Closure Alternative

Few long-term or permanent changes to ecological resources would be expected from implementing the Trail Closure Alternative. Short-term, temporary effects to animals that live along trail reaches could result from trail maintenance or trail closure activities. Small animals, including mammals, insects, and amphibians, occupying habitat areas along trail reaches could be temporarily displaced during trail caretaking activities; however, these species would be expected to return to the area as soon as work activities ended. Some increase in animal diversity might occur after certain trails were closed to all recreational users or the trails were closed to all users and reclaimed. Some selected vegetation along trails remaining intact with restricted use may be removed during trail maintenance activities, such as the removal of damaged, dead, or so-called “hazard” trees. No vehicle parking accommodations would likely be constructed under this alternative, nor would any new trails be built; therefore, no vegetation removal for clearing areas would be expected. As changes are made to the list of plants and animals protected under the ESA, the use of specific trails would need to be reassessed.

Federally-listed threatened or endangered species, or other sensitive species currently present at LANL, would not likely be adversely affected, nor would their critical habitat be adversely affected by activities associated with implementation of the Trail Closure Alternative. As changes are made to the list of plants and animals protected under the ESA, the use of specific trails would need to be reassessed. Trail maintenance work or work needed to permanently close a trail would be scheduled to accommodate the needs of sensitive species that use habitat located along certain trail reaches. Some sensitive species may slightly benefit from trail closures or the limitation of trail use to non-recreational users. The overall effect of implementing the Trail Closure Alternative to most sensitive species would be expected to be negligible to slightly beneficial

4.2.3 No Action Alternative

No changes to biota would be expected to occur through the implementation of the No Action Alternative. Some species of animals may not presently occupy areas of potentially suitable habitat along trail reaches due to the existing level of human intrusion into those locations; this status of species diversity would be expected to continue. Habitat degradation may slightly increase over time due to unchecked erosive forces and trail-user-incurred damages under the No Action Alternative. No adverse effect to sensitive species currently present at LANL or to the critical habitat for sensitive species would be expected due to the implementation of this alternative. As changes are made to the list of plants and animals protected under the ESA, the use of specific trails would need to be reassessed.

4.3 Cultural Resources

4.3.1 Proposed Action

Trail construction, maintenance, and closure activities associated with the implementation of the Proposed Action could provide some benefit to cultural resources protection. Activities would be coordinated with LANL archeologists in consultation with appropriate Native American tribes to minimize damages to any cultural resources present along trail reaches. Trails may be temporarily closed to recreational users during trail caretaking activities because of the need to flag or otherwise denote these resources to maintenance workers so that their actions can be adjusted to avoid any damages to the resources. In the event that a cultural resource is present along an existing trail such that it would be adversely affected by certain user group activities or would be unavoidably damaged by maintenance workers, the trail may be slated for permanent closure to all or certain users or it may be closed until the involved segment of trail can be rerouted around the cultural resource. Alternately, certain trail segments could be closed periodically for Native American use. If work necessary to close a trail to all user groups would result in an adverse effect to a cultural resource, a data recovery plan would be prepared and the SHPO and appropriate Native American tribes would be consulted before such work commenced. New trails would not be constructed in locations that would result in adverse effects to cultural resources either from trail users or maintenance workers.

4.3.2 Trails Closure Alternative

Implementing the Trail Closure Alternative would enhance the protection of cultural and historic resources from trail-user-incurred damages at LANL since all trails would be closed to recreational users and some trails would be closed to all user groups. If work necessary to close a trail to all user groups would result in an adverse effect to a cultural resource, a data recovery plan would be prepared and the SHPO and appropriate Native American tribes would be consulted before such work commenced.

4.3.3 No Action Alternative

Implementing the No Action Alternative would result in the likely continuation of insidious trail-user-incurred damages to cultural resources along the various LANL trails and within nearby areas. The risk that there would be violations by trail users of various Federal and State laws and regulations protecting archeological resources would likely increase over time as the location of the trails at LANL become known to a wider audience of people due to their advertisement on the World Wide Web and in trail guide books and various publications targeting tourists and area guests.

4.4 Water Quality

4.4.1 Proposed Action

The proposed Trail Management Program would have a negligible effect on surface water quality. Existing erosion problems along trails would be corrected through trails maintenance activities and the use of BMPs during maintenance and construction. Some minimal silting could occur as a consequence of the same activities. There would be no effects on groundwater quality.

4.4.2 Trails Closure Alternative

The Trails Closure Alternative would have a negligible effect on surface water quality. Existing erosion problems would be corrected through trails maintenance activities on selected trails that remain available for use by workers at LANL and officially invited guests. BMPs to prevent further erosion would be used on trails being closed. Some minimal silting could occur as a consequence of the same activities. There would be no effects on groundwater quality.

4.4.3 No Action Alternative

The No Action Alternative would have a slight adverse effect to surface water quality because erosion along trails would continue in some cases unchecked or would not be corrected on a routine basis. The No Action Alternative would not affect groundwater quality.

4.5 Environmental Restoration

4.5.1 Proposed Action

Implementing the Proposed Action would not likely affect ER Project sites because these are fenced, closed off, or otherwise identified where human health concerns are at issue. There would be no new trail construction in areas of contaminant concern. Trail or trail segments may be closed, restricted to only certain users, or rerouted around areas of concern as more contaminant information becomes available, and when areas are identified where continued or new use might be likely to exacerbate contaminants spreading into the environment.

4.5.2 Trails Closure Alternative

The Trails Closure Alternative would not likely affect ER Project sites because these are fenced, closed off, or otherwise identified where human health concerns are at issue. Closure of all existing trails to the public would eliminate the problem of non-LANL trail users possibly disturbing and destabilizing existing PRSs.

4.5.3 No Action Alternative

The No Action Alternative would not likely affect PRSs where human health concerns are at issue because these are fenced, closed off, or otherwise identified. Trails would not be routed around existing unfenced PRSs and this could result in potential contaminant exposures and spread of contaminants into the environment.

4.6 Transportation, Traffic, and Infrastructure

4.6.1 Proposed Action

Transportation patterns within LANL and the surrounding areas would be expected to slightly change; there would be no infrastructure changes expected, however, as a result of implementing the Proposed Action. A Trails Management Plan could result in closure of some LANL trails or restrictions to certain recreational user groups. This may result in an inconvenience with regards to recreational movement along trails between certain locations for some LANL workers or members of the public because they would have to seek other routes or means of transportation. Some trails remaining available for recreational users could be somewhat enhanced as existing impediments were removed over time as part of a routine maintenance program. This

enhancement could be slightly beneficial to some recreational trail users. Use patterns at LANL along existing trails would be expected to change slightly to accommodate users blocked from closed trails. The construction of new trails could create linkages in the network that would be attractive to trail users and this may result in shifts by users away from other trails. Parking for trail users could be slightly enhanced at LANL.

Transportation of materials, wastes, or recyclables would mostly be limited to transportation actions within LANL. Wastes would be transported to LANL waste management facilities, and recyclable materials would be transported to LANL storage yards via dump trucks or in pickup trucks. Since only one to two trails would likely receive attention in any given year, transportation needs would be limited to about two to twelve extra truck trips per year on internal LANL roads.

4.6.2 Trails Closure Alternative

Transportation patterns within LANL and the surrounding areas would be expected to slightly change. There would be no infrastructure changes as a result of implementing the Trails Closure Alternative. This alternative would result in the closure of all trails to recreational users and some trails to all user groups. Such closures could change traffic patterns both for recreational users and LANL workers and could inconvenience some trail users because they would have to choose alternative transportation routes and means.

4.6.3 No Action Alternative

Transportation patterns within LANL and the surrounding areas would not be expected to change nor would there be infrastructure changes as a result of implementing the No Action Alternative. Existing trailhead areas would continue to be used in the current manner; safety issues, a lack of informational signs, and inadequate parking capacity would persist.

4.7 Health and Safety

4.7.1 Proposed Action

The Proposed Action would have a minimal adverse effect on worker and public health. Workers involved in trail development, construction, and management would be trained to safely perform their tasks. Trail construction and management could require the use of handheld digging and vegetation removal equipment, pack animals (such as horses or mules), or small construction vehicles or trucks that could present minor but generally avoidable health and safety concerns. Trail users would include workers at LANL, officially invited guests, and members of the public. Trail activities would occur outdoors on uneven topography and would include exposure to changing weather conditions, such as lightning and flash floods; the potential for exposure to hazardous materials; and encounters with animals and plants that could cause injuries. Warning signs, alarms, or physical barriers would be used to alert trail workers and users to potentially hazardous situations.

4.7.2 Trails Closure Alternative

The Trails Closure Alternative would have a minimal adverse effect on worker and public health similar to the Proposed Action. Workers involved in trail maintenance and closure would be trained to safely perform tasks that could require the use of handheld digging and vegetation

removal equipment, pack animals (such as horses or mules), and small construction vehicles or trucks that could present minor but generally avoidable health and safety concerns. There would be less exposure to trail users because there would be no trails ultimately that would allow recreational users; use would be restricted to workers at LANL with work related trails use needs and to officially invited guests. Trail closure activities would occur outdoors on uneven topography and would include exposure to changing weather conditions, including lightning and flash floods; the potential for exposure to hazardous materials; and the potential for encounters with animals and plants that could cause injuries. Warning signs, alarms, or physical barriers would be used to alert trail workers and users to potentially hazardous situations. The closure of all LANL trails to recreational users would result in a negative effect to the health and well being of people who currently use the trails for recreational purposes.

4.7.3 No Action Alternative

Under the No Action Alternative, there would be minimal potential for adverse effects to worker and public health. Limited essential maintenance or closure activities could pose minimal hazards to workers. LANL workers and the public would continue to use existing trails and to create new and potentially unsafe trails. Trail users could be exposed to various physical, natural, and operational hazards because activities would occur outdoors on uneven topography; exposure to changing weather conditions, including lightning and flash floods; the potential for exposure to hazardous materials; and the potential encounters with animals and plants that could cause injuries. Continued erosion and trail-user-incurred damages over time would likely increase human health and safety risks along trails to trail users. Trail closure or trail segment closure could occur if safety issues or health issues arise under this alternative.

4.8 Environmental Justice

4.8.1 Proposed Action

There are no concentrations of minority or low-income populations in Los Alamos County, which is the county that would be most directly affected by the Proposed Action. Pueblo members of San Ildefonso and Santa Clara believe that adverse direct and indirect environmental effects to cultural resources could result if some trails remain open for public use and also if some trails were closed at LANL because trespassing could increase on lands belonging to these Pueblos. Tribal policing of their properties, the posting of signs warning against trespass that would accompany implementation of this alternative, and the public information and outreach activities that are part of the Proposed Action would limit such potential disproportionate effects to area Pueblo members and their lands. Nevertheless, this alternative has the potential to interfere with the use of TCPs by members of surrounding Pueblos.

4.8.2 Trails Closure Alternative

Pueblo members of San Ildefonso and Santa Clara believe that adverse indirect environmental effects to cultural resources could result if all trails at LANL were closed to the public because trespassing could increase on lands belonging to these Pueblos. Tribal policing of their properties, the posting of signs warning against trespass that would accompany implementation of this alternative, and the public information and outreach activities that are part of the Trails Closure Alternative would limit such potential disproportionate effects. Nevertheless, this

alternative has the potential to interfere with the use of TCPs by members of surrounding Pueblos.

4.8.3 No Action Alternative

San Ildefonso and Santa Clara Pueblos members believe that the existing situation (No Action Alternative) results in direct, indirect, and adverse environmental effects on cultural resources within LANL. They also believe that the No Action Alternative results in trespassing onto their lands, including sacred areas, and has the potential to adversely affect cultural resources within the boundaries of their lands. This alternative has the potential to interfere with the use of TCPs by members of surrounding Pueblos.

4.9 Soils and Geology

4.9.1 Proposed Action

Construction and maintenance activities associated with the proposed Trail Management Program would have minimal effects on soils in certain areas of LANL. Siltation and stabilization controls would limit or control soil erosion and rockfalls. Trails on mild slopes and on weathered tuff would require BMPs to minimize erosion. No effect on the local geology is anticipated from implementing the Proposed Action. Seismic activity could affect trails; however, the probability of a seismic event is very low.

4.9.2 Trails Closure Alternative

Maintenance and closure activities associated with the Trails Closure Alternative would have minimal effects on soils in certain areas of LANL. No effect on the local geology is anticipated from implementing this alternative. Seismic activity could affect trails; however, the probability of a seismic event is very low. These effects would be less than the Proposed Action because many if not most of the social trails at LANL would be closed and appropriate BMPs and other techniques would be used to preclude further erosion damage.

4.9.3 No Action Alternative

The No Action Alternative would result in continued unmanaged trail use at LANL. There would not be an ongoing and coherent approach designed to repair existing soil damage or to preclude further erosion caused by trail use.

4.10 Waste Management

4.10.1 Proposed Action

Implementation of the Proposed Action would not require the construction of any new waste landfills. The reuse of existing recyclable materials stockpiled at LANL would be a beneficial effect to the overall waste management program at LANL. The Proposed Action would generate a very small amount of solid waste from construction, maintenance, or closure activities that would be disposed of at the Los Alamos County Landfill or its replacement facility in accordance with practices required by LANL's Laboratory Implementing Requirement for General Waste Management (LANL 1998). It is expected that all excavated material (such as soil and rocks) would either be used in the construction, repair, or closure activities performed for individual trails or at new parking areas or along new trails. Any excess soil or rocks, or

removed or excess asphalt or concrete materials, generated during the various trails activities would be crushed and recycled for use as road base or for landscaping materials at LANL or offsite. It may be necessary to use construction debris staging areas for a short period of time to stockpile these materials until they are reused in other projects.

Trees and woody vegetation could be removed from various locations along trails or new parking areas. Brush, trees, or vegetation could be chipped onsite and spread along trail corridors or may be removed to the Los Alamos County Landfill for chipping and reuse as mulch. Chipped material would not be spread in or near any floodplain or waterway.

About one to six truckloads of recyclables or wastes would be expected to be generated per year. This would amount to a maximum of about 120 yd^3 (91 m^3) per year of wastes requiring disposal. This quantity of waste is well within the waste management capabilities of LANL facilities.

4.10.2 Trails Closure Alternative

Implementation of the Trails Closure Alternative would result in waste management and waste recycling impacts similar in character and quantities to those described for the Proposed Action. Most wastes would be generated as a result of trail closure activities; trail maintenance activities along trails that would remain open to limited user groups would generate less wastes over time than would be expected to be generated by the Proposed Action.

4.10.3 No Action Alternative

There would be no additional waste generated under the No Action Alternative, since there would be no trails construction activities. The construction debris waste shipments to landfills or recycling centers would not occur.

4.11 Air Quality

4.11.1 Proposed Action

Construction, repair, or trail closure activities conducted as a result of implementing the Proposed Action could result in temporary, localized emissions associated with vehicle and equipment exhaust as well as in particulate (dust) emissions from excavation and construction activities. Effects on air quality in the LANL area would be expected to be temporary and localized as well. There would be no long-term degradation of regional air quality. The air emissions would not be expected to exceed either the NAAQS or the NMAAQS. Effects of the Proposed Action on air quality would be negligible compared to potential annual air pollutant emissions from LANL as a whole.

Implementing appropriate control measures would mitigate fugitive dust. Frequent watering with watering trucks would be used to control fugitive dust emissions at new parking lot sites. Despite the use of soil watering during excavation to control dust emissions, some soil could potentially be suspended in the air prior to paving activities. Emissions from diesel engine combustion products could result from excavation and construction activities involving heavy equipment. Emissions would not cause an exceedence of any NAAQS or NMAAQS. All air emissions associated with the operation of excavation and construction equipment would be below ambient air quality standards. Total emissions of criteria pollutants and other air emissions associated with the operation of heavy equipment for excavation and construction activities would contribute greater emissions than other vehicles due to the types of engines and

their respective emission factors. Heavy equipment would emit small quantities of criteria pollutants subject to the NAAQS and NMAAQS as adopted by the State of New Mexico in its State Implementation Plan[9].

4.11.2 Trails Closure Alternative

Implementation of the Trails Closure Alternative would be expected to result in temporary, localized emissions associated with vehicle and equipment exhaust as well as in particulate (dust) emissions from trail repair or closure activities. The air emissions would not be expected to exceed either the NAAQS or the NMAAQS. Effects on air quality from implementing the Trails Closure Alternative would be negligible compared to potential annual air pollutant emissions from LANL as a whole. All air emissions associated with the operation of excavation and construction equipment would be below ambient air quality standards.

4.11.3 No Action Alternative

There would be no change from ambient air quality effects associated with implementing the No Action Alternative. Trail maintenance, construction, and closure activities would not be expected to occur except in an ad hoc fashion and on a very small scale.

4.12 Noise

4.12.1 Proposed Action

The Proposed Action would be expected to result in limited, short-term increases in noise levels associated primarily with various construction activities and, in a more limited fashion, with trails repair or closure activities. Following the completion of these activities, noise levels would return to existing levels. Noise generated by the Proposed Action is not expected to have an adverse effect on either LANL workers or members of the public or on wildlife that may be using forested trail areas. Noise generated by trail maintenance, repair, construction, or closure activities would be very short term in duration and highly localized and would be consistent with noise levels in nearby developed areas at LANL. Some startle response may be experienced by area wildlife from trails work and, possibly, from trails use, but it is not expected that any adverse wildlife effects would be associated with unusual, loud, and potentially startling noises.

Earth-moving activities and some trail construction activities could require the use of heavy equipment for removal of debris, dirt, and vegetation and for paving of new parking areas. Heavy equipment such as front-end loaders and backhoes would produce intermittent noise levels at around 73 to 94 dBA at 50 ft (15 m) from the work site under normal working conditions (Canter 1996, Magrab 1975). Truck traffic would occur frequently but would generally produce noise levels below that of the heavy equipment. Personal protective equipment would be recommended if site-specific work produced noise levels above the LANL action level of 82 dBA. Based upon a number of physical features, such as attenuation factors, noise levels should return to background levels within about 200 ft (66 m) of the noise source (Canter 1996). Since sound levels would be expected to dissipate to background levels before reaching most publicly accessible areas (the trails would be closed to use while trail work using heavy machinery was being conducted) and seasonal timing restriction would apply to trail stretches at or near

[9] The purpose of the State Implementation Plan is to ensure that Federal emission standards are being implemented and NAAQs are being achieved.

sensitive wildlife habitats, noise generated by implementing the Proposed Action should not be expected to be noticeable to members of the public or to disturb local wildlife. Traffic noise from commuting workers would not be expected to noticeably increase the present traffic noise level on roads at LANL. The vehicles of workers would remain parked during the day and would not contribute to background noise levels. Therefore, noise levels are not expected to exceed the established TLV.

4.12.2 Trails Closure Alternative

Implementing the Trails Closure Alternative would be expected to result in limited, short-term increases in noise levels similar to those described in the previous subsection regarding the Proposed Action. Most noise would be generated during trail closure activities and there would not likely be any associated noise generated during construction activities using heavy equipment.

4.12.3 No Action Alternative

Under the No Action Alternative, ambient noise levels would remain unchanged at LANL. Potential noise from trail repair, construction, or closure activities would not occur with any frequency as trail repairs or closure activities would be performed rarely and in an ad hoc fashion. Environmental noise levels in and around LANL would be expected to remain below 80 dBA on average.

5.0 Accident Analysis

5.1 Introduction

Trail construction and use are relatively low-risk activities that can be expected to have minimal effects from accidents on workers and trail users. This chapter analyzes potential accidents associated with the three alternatives for trails management at LANL. The Proposed Action (establishment of a Trails Management Program) is discussed first, followed by a comparison of the Trails Closure Alternative and the No Action Alternatives. This section considers the activities of trails development and maintenance under construction hazards and trail use under operational hazards. Guidance used for the development of this section is primarily from the document titled *Analyzing Accidents Under NEPA* (DOE 2002).

An accident is an unplanned event or sequence of events that results in undesirable consequences. Accidents may be caused by equipment malfunction, human error, or natural phenomena. Accidents have an estimated frequency of occurrence of once per ten years to once per one million years (1×10^{-1}/yr to 1×10^{-6}/yr); whereas, occupational health incidences are expected, occurring at an estimated frequency of greater than or equal to once per year ($\geq 1 \times 10^{0}$/yr). For example, an occupational health incident might be a cut or animal bite; an accident might be a worker being struck by lightning. Accident impacts are often, but not always, much greater than occupational health impacts. The accidents of highest consequence that are likely to receive the most complete analyses are exposure to radiological or hazardous materials and lightning strikes.

Under NEPA, the purpose of performing accident analyses for this programmatic EA is to weigh accident issues among the trails alternatives such that the DOE can consider this information for making their decision on which alternative to pursue. The objectives are to (1) characterize the overall risk of injury, illness, or death to workers or the public resulting from accidents and (2) realistically qualify and/or quantify the increment in risk among the alternatives. The level of complexity of the analyses needs to be commensurate with the significance of the hazards.

The SWEIS (DOE 1999a) established the baseline risk for operations at LANL, and the accident analyses in this section tiers from the SWEIS to the extent possible. For example, the risk to trail users of an exposure to radiation or hazardous chemicals from an accident at LANL can be based on existing source terms in the SWEIS, but the main difference to be considered is the distance from the facility to persons on the trails.

Following DOE guidance, the process used to ultimately analyze accidents for trails activities included the identification and screening of accidents, the estimation of accident likelihood and potential consequences and health effects, and the estimation of risk. A limited spectrum of accidents was established that enabled the analysis of incremental risk, if any, for each alternative. Under the Proposed Action, it is anticipated that only standard industrial activities and processes would be performed, resulting primarily in potential accidents that are common to many other agencies nationwide that manage forested lands. As such, postulated accidents that occur on LANL trails are expected to affect only persons using or working on the trails.

5.2 Construction Accidents

Potential accidents were identified as being associated with the maintenance and upkeep of existing trails; the development of new trails; and the reclamation of trails. Accident

identification considered those hazards associated with cutting and vegetation removal, including the use of chainsaws, chipping, hand-held digging, and other mechanical processes; falling tree limbs, rockslides, and flash floods; lightning, wildfire, and other natural hazards; and the use of small construction vehicles and trucks. Workers developing or maintaining trails could potentially be exposed to radiation or hazardous chemicals in or from a PRS or from a release from an accident at a LANL facility. This accident type is considered under Operations Accidents.

Accidents were screened on the basis of suggested DOE criteria (DOE 2002). A wide range of effects can result from these activities, including minor perturbations such as scrapes, cuts, and bruises as well as more serious injury, illness, and death. These minor perturbations were screened out. Statistics on rates of illness, injury, and death are available for the occupation of forestry and were consulted and applied to this project (NSC 1994). In general, the risk of injury or death is extremely low so no serious accidents are expected from potential construction activities.

5.3 Operations Accidents

Operations are considered to be the phase of the Proposed Action or alternatives where trails are used by the general public or LANL workers. The traditional approach of accident analyses performed at LANL under NEPA has been to postulate accidents that originate at a facility, operation, or activity that is specifically and directly associated with the Proposed Action and to analyze effects that could occur to receptors located outwardly from the facility of origin. Trail using members of the public would be within the LANL boundary, so this NEPA analysis considers effects that could result from LANL's industrial setting upon these people, specifically effects that could occur in the vicinity of subject facilities of concern (DOE 1997).

Accidents involving the potential release of radiological or hazardous materials are somewhat unique to DOE facilities and were given special consideration for the Proposed Action because of public interest in this subject. Trail users represent receptors that could potentially be out of hearing range of LANL sirens or alarms; therefore, trails users would not necessarily be subject to DOE/LANL evacuation procedures. The potential effects from this type of accident are applicable to trails construction and maintenance workers as well as the public and other classes of users. However, in general, the risk of injury to the public from an operations accident at LANL is extremely low so no serious consequences are expected from potential operations accidents.

5.4 Comparison of Alternatives

5.4.1 Proposed Action

Trail construction and use are relatively low-risk activities that can be expected to have minimal effects on workers and trail users from accidents. Trails development, construction, management, and use are not inherently risky activities because the frequency of high-consequence accidents such as a person being struck by lightning or being consumed by wildfire is low. Under the Proposed Action there would be more trails work, maintenance, and, possibly, trail use, creating more opportunities for accidents; however, the risk would be reduced by enhanced training and worker protection, a safer design to the trail system, better maintenance,

and more safety information such as warning signs and alarms; all of which would occur under a Trails Management Program.

5.4.2 Trails Closure Alternative

As previously discussed, under this alternative there would be fewer trails and use would be restricted to workers at LANL and officially invited guests. Accident frequencies would be even less than with the Proposed Action. Generally, this alternative is the safest with regard to potential accident impacts because there would be fewer trails and less use of the remaining trails. In addition, fewer worker hours would be spent on trails. This alternative would most likely have a lower likelihood of accidents than the Proposed Action, which is expected to be minimal.

5.4.3 No Action Alternative

The No Action Alternative would include the continuation of current minimal trail maintenance and current use rates. No approved new trails would be constructed and only minimal improvements would be made to existing trails. Workers at LANL and some members of the public would continue to use existing trails and they may create new, unapproved trails. This alternative has the highest risk, comparatively, with regard to potential accidents because the controls that are applied under the proposed Trails Management Program that mitigate hazards are either non-existent or less effectively applied under this alternative. Nevertheless, like the other alternatives, trail use under this alternative is a relatively safe activity with high-consequence accidents likely to be absent.

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6.0 Cumulative Effects

Cumulative effects on any affected resources as a consequence of the Proposed Action (a Trails Management Program at LANL) are expected to be negligible. Cumulative effects are caused by the aggregate of past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes them. These effects can result from individually minor, but collectively significant, actions taking place over a period of time (40 CFR 1500-1508). The cumulative effects analysis in the LANL SWEIS already documents the regional effect of the Expanded Operations Alternative and provides context for this EA. This section evaluates the cumulative effects of implementing the Proposed Action, the Trails Closure Alternative, and the No Action Alternative with the effects resulting from common issues of other actions that have, are, and will be taken at LANL or by adjacent jurisdictions.

Land use and visual resources are dismissed from cumulative effects consideration because it was determined they would not be affected by the Proposed Action, the Trails Closure Alternative, or the No Action Alternative and therefore could not contribute collectively to ongoing or reasonably foreseeable actions (see Table 2). Eight other resources analyzed in Chapter 4 of this EA would have a minimal contribution to cumulative effects, because neither the Proposed Action, the Trails Closure Alternative, or the No Action Alternative would have long-term direct, indirect, or irreversible effects on environmental restoration, geology and soils, transportation and infrastructure, water quality, health and safety, waste management, air quality, or noise.

Ecological resources, cultural resources, environmental justice, and socioeconomics are the affected resources that are discussed further in this section, because the analysis in Chapter 4 and the scoping for this EA indicated that there could be some minor direct or indirect effects on ecological, cultural, socioeconomic resources, and environmental justice as a consequence of the Proposed Action and the Trails Closure Alternative; and some irreversible effects on cultural resources as a result of the No Action Alternative, as well as some minor direct and indirect effects on environmental justice.

Cultural Resources. NNSA and LANL are preparing a Cultural Resources Management Plan in accordance with the Mitigation Action Plan set forth in the SWEIS ROD. The Proposed Action would implement a Trails Management Program with a process to identify cultural resources present along each trail and the trails designated as cultural properties by the State of New Mexico. This would include consultation with the four Accord Pueblos regarding the potential presence of TCPs and other traditionally or culturally sensitive areas as identified by these communities. NNSA would seek concurrence from the SHPO regarding mitigation plans for affected cultural resources and trails. If trail closure or trails use continuance would result in an unavoidable adverse effect to a cultural resource, a data recovery plan would be prepared and the SHPO and appropriate Native American tribes would be consulted before commencing work or identifying the trail for continued use.

Environmental Justice. The Proposed Action could partially address issues raised by local Pueblos during the scoping process. A Trails Management Program could result in a slight increase in trespassing and inappropriate activities that currently affect the Pueblos in a disproportionate manner because of the existence of TCPs at LANL and the proximity of Pueblo lands to some LANL trails.

Ecological Resources. An Integrated Resources Management Plan is being implemented at LANL to coordinate responsible environmental stewardship at LANL that is consistent with its missions. This management plan will also help LANL management operate the facility without incurring adverse cumulative environmental effects pursuant to the SWEIS ROD. The Proposed Action would have a minimal contribution to adverse cumulative effects on ecological resources. The Proposed Action would enhance LANL stewardship of critical habitat and sensitive species. Some trails could be closed during certain times, and others would be rerouted or repaired in a fashion so as to minimize habitat disruption or damage; other trails may be closed to recreational users or to certain user groups such that habitat use may be enhanced along the trails reach.

Socioeconomics. The Proposed Action would seek to strike a balance between the desire to use LANL trails for recreation, the need for LANL to foster environmental stewardship of ecological and cultural resources on lands that are also part of a NERP, and the need to address the concerns of local Pueblos and other adjoining neighbors regarding trails use at LANL.

The activities discussed in the LANL SWEIS and recently approved projects within the boundaries of LANL are considered here for the cumulative effects assessment. As stated in the LANL SWEIS and ROD, ecological and biological resources would not be adversely affected by ongoing and certain expanded operation at LANL (DOE 1999a). The ROD for the *EIS for the Conveyance and Transfer of Certain Land Tracts Administered by the U.S. Department of Energy and Located at Los Alamos National Laboratory, Los Alamos and Santa Fe Counties, New Mexico* (DOE 1999b) concluded that habitat could be fragmented, wildlife migration corridors could be disrupted, and that the disposal of land to the identified parties, particularly where it would be conveyed outside of Federal government control, could result in less-rigorous environmental review and protection processes. However, most of the land to be conveyed would be preserved or used for recreation; only a small portion is planned for development. According to the EA and Finding of No Significant Impact for the *Electrical Power System Upgrades at Los Alamos National Laboratory* (DOE 2000b, c), less than 25 ac (10 ha) of land would be disturbed by that project. The Finding of No Significant Impact for the *Wildfire Hazard Reduction and Forest Health Improvement Program at Los Alamos National Laboratory Environmental Assessment* (DOE 2000d, e), concluded that the Proposed Action (No Burn Alternative) would implement a Wildfire Hazard Reduction and Forest Health Improvement Program at LANL that would not use fire as a treatment measure to treat approximately 30 percent, (10,000 ac or 4,000 ha), of LANL. The Wildfire Hazard Reduction and Forest Health Improvement Program would use mechanical forest thinning and the construction of access roads and fuel breaks as treatment measures. The Wildfire Hazard Reduction and Forest Health Improvement Program would have a long-term beneficial effect on a variety of resources at LANL. Correspondingly, there would also be long-term beneficial contributions to any cumulative effects on resources resulting from actions at LANL or by surrounding land managers.

On July 25, 2000, the Federal government purchased approximately 89,000 ac (35,600 ha) of the Baca Ranch in northern New Mexico, located approximately 6.5 mi (10.5 km) west of LANL. The *Valles Caldera Preservation Act* designated these spectacular lands as the Valles Caldera National Preserve, a unit of the National Forest System. It was established to "…protect and preserve the scientific, scenic, geologic, watershed, fish, wildlife, historic, cultural, and recreational values of the Preserve, and to provide for multiple use and sustained yield of renewable resources within the Preserve," consistent with *Valles Caldera Preservation Act*

(http://www.vallescaldera.gov /about.php). The Preserve is administered under the Valles Caldera Trust by a Board of Trustees that is responsible for establishing and enforcing the conditions that apply to its management and use. The Preserve is accessible to the public for limited recreational use under specific restrictions and conditions.

This analysis concludes that there would be only minimal and slight cumulative effects on these resources as a consequence of the aggregate of the Proposed Action and past, present, and reasonably foreseeable future actions. There could be some positive cumulative effects to ecologic and cultural resources as a consequence of the Proposed Action or the Trails Closure Alternative. Both these alternatives would also tend to lessen disproportionate effects of trespassing and inappropriate use upon adjacent Pueblos and therefore foster environmental justice. The Trails Closure Alternative could also have a slightly negative effect on recreation and tourism in Los Alamos County and affect local socioeconomics. The No Action Alternative could pose slightly negative cumulative effects to cultural and ecological resources and to environmental justice. In conclusion, the effects of the Proposed Action, when combined with those effects of other actions defined in the scope of this chapter, would result in negligible cumulative effects.

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7.0 Agencies Consulted

NNSA, as the lead agency for the preparation of this EA, invited Los Alamos County, Santa Fe National Forest, Bandelier National Monument, and the four Accord Pueblos of San Ildefonso, Santa Clara, Jemez, and Cochiti to be cooperating agencies. The National Park Service is a cooperating agency and staff from Bandelier National Monument participated in the scoping and preparation of this EA. Representatives from the U.S. Department of Agriculture, Forest Service also participated in the preparation of the EA, but not as an official cooperating agency. This was also the case for Los Alamos County, which had parks and open space staff and appointed board members participate in the EA's preparation. San Ildefonso and Santa Clara Pueblos were also consulted and participated by attending scoping meetings and providing comments that were incorporated into this EA.

The Proposed Action would establish a Trails Assessment Working Group comprised of representatives from LANL's management and operations contractor and NNSA; representatives of Los Alamos County, Bandelier National Monument, the Santa Fe National Forest, and the Four Accord Pueblos would be invited to participate. The Trails Assessment Working Group would coordinate land management issues related to trails at LANL through working groups such as the East Jemez Resource Council and would convene as necessary to consult and advise appropriate LANL management personnel on trails management issues.

The Proposed Action would implement a Trails Management Plan that would address cultural resources astride certain trails and some of the trails that are also designated as historic properties on the State Register of Cultural Properties. The planning process would include the identification of cultural resources present along and near each trail. This identification process would include consultation with the four Accord Pueblos regarding the potential presence of TCPs and other traditionally or culturally sensitive areas as identified by these communities. NNSA would seek concurrence from the SHPO regarding mitigation plans for affected cultural resources and trails. If keeping a trail open to recreational use or closing a trail would result in an unavoidable adverse effect to a cultural resource, a data recovery plan would be prepared and the SHPO and appropriate Native American tribes would be consulted before such work commenced.

NNSA has determined that no consultation with the U.S. Fish and Wildlife Service regarding the potential effect of the Proposed Action on Federally protected threatened or endangered species or their critical habitat is necessary as there would be no adverse effect to individuals of sensitive species or their critical habitat from the Proposed Action. Actions proposed would be undertaken in accordance with the LANL Threatened and Endangered Species Habitat Management Plan for which all necessary ESA compliance has been completed. Should new species be listed under the ESA that occur at LANL, or if areas of LANL become occupied by listed species in the future, these changes to the LANL setting could result in the need for further consultation with the U.S. Fish and Wildlife Service.

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(16 USC 470) *National Historic Preservation Act*, 16 United States Code, Chapter 1A, Subchapter II, Section 470.

(16 USC 1531) *Endangered Species*, 16 United States Code, Chapter 35, Section 1531.

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Appendix A

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State of New Mexico
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1190 St. Francis Drive, P.O. Box 26110
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BILL RICHARDSON
GOVERNOR

RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

August 26, 2003

Elizabeth Withers
NEPA Compliance Officer
Los Alamos Site Office
528 35th Street
Los Alamos, N.M. 87544

FAX: (505) 667-9998

Dear Ms. Withers:

RE: PDEA: PROPOSED LOS ALAMOS NATIONAL LABORATORY (LANL) TRAILS MANAGEMENT PROGRAM (DOE/EA 1431)

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Predecisional Draft Environmental Assessment (PDEA).

BACKGROUND

The proposed action would implement a Trails Management Program at LANL to address trails used by the public, LANL workers and guests. A Trails Assessment Working Group would be established and make recommendations for specific decisions within the scope of the proposed action. The scope described in this document minimizes adverse environmental impacts and would provide a mechanism to implement the relevant decisions and mitigation measures from the record of decisions of previous Environmental Impact Statements. The PDEA states:

> *Repair, construction, environmental protection, safety, and security measures would be formulated and implemented. End-state conditions and post-repair or post-construction assessment would be performed . . . . foster a more balanced use of LANL trails while allowing some recreational use to continue. The establishment of a Trails Management Program would result in enhanced protection of cultural resources with minimal to negligible effects on the other LANL resources.*

A second alternative presented though not proposed was the Trails Closure Alternative.

The No Action alternative was described for baseline comparative analysis, as required by NEPA.

Elizabeth R. Withers
August 26, 2003
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We concur with DOE's Proposed Action to develop a Trails Management Program and believes it will help to implement the Mitigation Action Plan developed following the Record of Decision for the LANL Site-Wide Environmental Impact Statement, as well as other recent EIS mitigation actions.

There are several specific comments that we offer which may help the DOE improve the accuracy and readability of the final Environmental Assessment.

COMMENTS

General Comment 1:

The descriptions in Chapter 3, Affected Environment, sometimes repeat language we have seen in other NEPA documents. Comments we have made at those times have not always been addressed and hence what we believe are errors are repeated. The boiler plate language used to make the production of these documents more efficient should have a detailed review and incorporate corrections. This will allow all parties to focus on those details pertinent to the particular EIS or EA while not providing poor background information to the decision makers.

There are also occasions where speculation is juxtaposed with factual statements. These probably correspond to areas which are not particularly important to the final decision. However, when there is no information to provide to the decision maker, opinions should not be substituted.

Specific Comment 1: 2.1.1, Individual Project Planning Measures, p. 14

LANL would lead and coordinate a standing Trails Assessment Working Group to advise the LANL Associate Director of Operations on trails management. It would "convene as necessary." It would consist of LANL cultural, ecological, health and safety, security, site planning, and facilities specialists and representatives from NNSA, Los Alamos County, Bandelier National Monument, the Santa Fe National Forest, and the four Accord Pueblos. Recommendation: The benefits of the Trails Assessment Working Group would be clearer if a minimum schedule for convening and a mechanism for including trail users input were defined.

Specific Comment 2: 2.5.2, Final . . . for the Conveyance and Transfer of Certain Land Tracts . . . ., p. 23

"Tribal Management Program," the final three words of this section, may be an error. The DOE may have meant to have the sentence read, "Trails on lands conveyed or transferred would not be included in the Trails Management Program."

Specific Comment 3: 3.4, Water Quality, p. 29

Perennial springs within LANL supply base flow to streams in some canyons. This is a significant omission as the source of these springs may be the same alluvial and intermediate perched zones which have been affected by LANL operations. Recommendation: Change the language in section 3.4 to reflect a more up-to-date and accurate description of the surface waters on LANL.

Elizabeth R. Withers
August 26, 2003
Page 3

Specific Comment 4: 3.7, Health and Safety, p. 30

The document states that workers "are generally considered" and trail users "would generally be" of a specific health condition. Statements like these, which may lead to conclusions based on implied general knowledge, do not provide a strong basis for decision-making. Recommendation: In this section and in others, information provided in the EA upon which decision makers rely should be interpretations of facts and data, and not implied general knowledge.

Specific Comment 5: 3.11, Air Quality, p. 33

The EA comments "LANL employees take appropriate steps to control fugitive dust and particulate emissions during construction activities. Best Achievable Control Measures such as the use of water sprays or soil tacifiers are used to reduce fugitive dust emissions from cleared areas." Recommendation: It would strengthen this statement to cite the policy, SOP or other document which directs, informs, cajoles or requires LANL employees to take appropriate steps. Knowing if these requirements do or do not apply to contractors may also assist decision makers.

Specific Comment 6: 3.11, Air Quality, p. 33

The EA states, "Annual dust emissions from daily windblown dust are generally higher than short-term, construction-related dust emissions." This could indicate either that construction practices in this area are very good, or other site environmental factors are very bad. It opens up the question, not properly related to this EA, about what is being done about the high level of fugitive dust emissions at LANL. It also could leave a decision maker wondering what the cumulative effect of both sources of dust emissions might be. Recommendation: It may be possible to find a different benchmark to demonstrate that construction related dust emissions make a relatively small contribution to the overall dust emissions. Quantifying the overall dust emissions at LANL may provide meaningful contextual information.

Surface Water Quality Comments

The U.S. Environmental Protection Agency (USEPA) requires National Pollutant Discharge Elimination System (NPDES) permit coverage for storm water discharges from construction projects (common plans of development) that will result in the disturbance (or re-disturbance) of one or more acres, including expansions, of total land area. Because this project may exceed one acre, it may require appropriate NPDES Construction General Permit coverage prior to beginning construction.

Among other things, this permit requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared for the site and that appropriate Best Management Practices (BMPs) be installed and maintained both during and after construction to prevent, to the extent practicable, pollutants (primarily sediment, oil & grease and construction materials from construction sites) in storm water runoff from entering waters of the U.S. This permit also requires that permanent stabilization measures (revegetation, paving, etc.), and permanent storm water management measures (storm water detention/retention structures, velocity dissipation devices, etc.) be implemented post construction to minimize, in the long term, pollutants in storm water runoff from entering these waters.

Elizabeth R. Withers
August 26, 2003
Page 4

You should also be aware that EPA requires that all "operators" (see **Federal Register/Vol. 68, No. 39087/Tuesday, July 1, 2003**) obtain NPDES permit coverage for construction projects. Generally, this means that at least two parties will require permit coverage. The owner/developer of this construction project who has operational control over project specifications (probably the Department of Energy) and the general contractor who has day-to-day operational control of those activities at the site, which are necessary to ensure compliance with the storm water pollution plan (and other permit conditions), will require appropriate NPDES permit coverage for this project. Additional entities requiring permit coverage may include the University of California (as of this writing) and possibly other corporations or institutions that meet the regulatory definition of "operator."

Finally, any project that involves dredge and fill work in a water of the U. S. (river, creek, arroyo, gully, etc.) must obtain a Section 404 (of the Clean Water Act) permit from the Corps of Engineers. Almost all permits for work in a perennial stream have the condition of State water quality certification (Section 401).

We appreciate the opportunity to comment on this document.

Sincerely,

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1753ER

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary. I am an avid mountain biker and hiker. I am also a member of the Tuff Riders Mountain Bike Club and of the The International Mountain Bike Association (IMBA). One of the reasons my wife and I moved to Los Alamos was because of the varied access to recreational activities within the town limits. This convenience is very important to us, as well as most of the citizens of Los Alamos. This is also a huge draw to tourists as well as new employees to LANL.
I think that implementing a trails management program is a good idea. Especially in the fact of trail maintenance and in determining which trails should be re-routed because of being too near to sensitive areas of the lab, Management is a good idea but complete closure to all recreational use will cause an enormous negative impact upon the quality of recreational activities in this area.
I also ask that you please consider inviting members of many of the recreational clubs in Los Alamos to take part in any trail committees. In my case, the Tuff Riders Mountain Bike Club.
I urge that you please not consider permanent trail closure for recreational use as an option towards management of trail access.
Thank you and please continue to keep the community informed.
James Beldzik

If you would like a response please provide your name and a mailing address:
James Beldzik [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ✓	No Thanks

If "Yes", where should it be sent?
address listed above.

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.
I favor the Trails Management Plan Alternative, with exposure, and well-advertised, public input. As much as possible, the trails should remain open – especially those providing connections between... (cont. on other side)

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks ✗

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

the townsite and Lab, townsite and national forest ~~[illegible]~~ and Bandelier ~~trails~~, Lab and ~~townsite~~ (and DOE) national forest and Bandelier trails. We have a wealth of beautiful trails that are highly valued by the community and are currently an important part of our lives.

NNSA
National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

I strongly urge DOE/NNSA and LANL to do their best to keep all possible trails open. I support protecting our natural resources, but I know both goals can be accomplished. A key reason many of us consented to move →

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ✓	No Thanks

If "Yes", where should it be sent?

Nancy Ambrosiano
[redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

to this remote area is access to the land.
We pay hugely inflated home prices for the privilege of living up here, leave our families far behind and other horse facilities behind. Don't take away one of the key "Quality of Life" benefits this laboratory can offer please! Imagine buying lakeside property, then having the lake closed!

I am an active trail user, head of a local youth horsemanship club, and access to these trails is critical to my weekly activities. For our conditioning work for competition, we are on the trails 3 or 4 days a week. If the trail access off Pajarito Acres is blocked, our conditioning gallops (2 to 4 miles each day) will have to move to the roadside, a serious safety issue, especially for our kids.

We are happy to work in concert w/ the Lab committee, as we think of ourselves as the good guys — we have been asked by the Bandelier rangers to be an "eye" in the forest for identifying potential archaeological site damage, vandalism, etc. To face possible expulsion from the land is devastating and makes me far more likely to accept a job offer from elsewhere.

Thank you, Nancy Ambrosiano

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

#1 Trail user groups Must be identified & contacted as part of proposed action - especially the "LANL - Sanctioned" groups like the Tuff Riders.

See other side for more

If you would like a response please provide your name and a mailing address:

Bart Vander. Ples - [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
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The public comment period ends August 5, 2003.

#2 Presentation @ meeting was overwhelmingly negative - No positive reasons for keeping trails was presented UNTIL issue was raised.

#3 Closure or restrictions tremendously impact socioeconomic issues. If a commuter can't trust that a trail will be open - the commuter must find another commuting option (typically using the roads - a much more damaging and dangerous option).

#4 Mental health impact on LANL workers - use of trails on breaks - during lunch etc. provides a great stress reliever.

#5 Closing ALL trails (as currently is the situation) creates a security problem because now security has to patrol the entire 52 sq. mi. continuously because there are no people present to observe any suspicious activities.

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

The "statement of purpose and need for agency action" clearly lays out the reasons for the proposed program. However, the "primary considerations" list make no mention of long

If you would like a response please provide your name and a mailing address:

P. C. Gray [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?

Same as above address

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
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consideration in decisions for impact on quality of life for the Los Alamos community. The people in direct contact with the lab have a major stake in the recreational use of appropriate laboratory trails, both for their own use an the effect their loss would have on property value and tourism. The access to these trails was allowed for a purpose, and those purposes are still valid and should be a major consideration in any action taken with regard for maintaner or closure. ~~In addition to this the laboratory~~

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
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Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Tuff Riders Mountain Bike Club is a LANL sanctioned organization that has Tremendous trail maintenance & management experience. Rick Kelly is trail access committee chair.

If you would like a response please provide your name and a mailing address:

Lain - Bart Vanden Plas

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

The proposed action does have potential positive impacts that have NOT been clearly communicated such as:

1. Current lack of plan allows TOTAL closures at the WHIM of LANL
2. There are no resources spent on improving the tremendous ASSET these trails represent to LANL, the DOE, NNSA, Los Alamos, and visitors to the area.
3. There is no coordination with neighbors on trail use issues - both positive & negative.
4. There is NO coordination within LANL between HS, Security, Human Resources, field workers, facility operators, etc.
5. There is no way to tap into the community to assist with mitigating any potential negative impacts.

Finally - This needs to be presented in a much more POSITIVE light. People WANT to know "WHAT'S in it for me" & will approach this from a very NEGATIVE viewpoint such as: "They are taking MY trails!"

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

TuA Riders Mountain Bike Club is a LANL sanctioned organization that has Tremendous trail maintance & management experience. Rick Kelly is trail access committee chair.

If you would like a response please provide your name and a mailing address:

Jain - Bart Vandenplas

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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~~THE~~ REASONING IS AS FOLLOWS,

1. ANCHO AREA TRAILS PROVIDE A VALUABLE WINTER RECREATIONAL OPPORTUNITY, WHEN OTHER AREA TRAILS ARE TYPICALLY TOO SNOWY FOR WORTHWHILE HIKING.

2. LOS ALAMOS CANYON TRAILS PROVIDE POTENTIAL FOOT LINKS FROM TOWNSITE TO ADJACENT TECH AREAS 3, 6, 53 ETC. WHICH ~~CAN~~ PROVIDE A USEFUL ALTERNATIVE COMMUTING PATH.

3. IN GENERAL, I BELIEVE THAT THE TRAIL NETWORK ARE A SIGNIFICANT DRAW FOR BOTH POTENTIAL LANL EMPLOYEES AND TO A LESSER EXTENT TOURISTS, AND FOR RESIDENTS MAKE THIS A MUCH NICER PLACE TO LIVE THAN IT WOULD BE OTHERWISE. THUS I THINK IT IS IN LANL'S BEST INTEREST TO LEAVE THEM OPEN WHENEVER PRACTICAL.

National Nuclear Security Administration

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1) In section 2.1.1 under "Establishment of Trails Assessment Working Group," you have no allowance for committee members from the trails user groups: hikers, bicyclists, joggers and equestrians. I know for a fact that the (see other side)

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many efforts for recovery that is also funded)

Los Alamos Tuff Riders is a Laboratory sanctioned organization, and therefore, should be represented on such a committee. I do not know if the other user groups (hikers, joggers, equestrians, etc.) have Laboratory sanctioned representative groups. If they do, they should also be allowed to have representatives on this committee whose sole mandate is to represent their user communities to the exclusion of other concerns.

(2) In reading this document, I could not help but notice that in most sections actual trail usage is referred to in a negative manner. That is how trail use adversely impacts endangered species, historical/cultural sites, etc. I find this characterization very disturbing. Trail use does not equal destruction/damage/degradation of the environment! I think that you should critically examine the tone and language use throughout this report to implement neutral language when referring to trail use.

(3) Finally I cannot express in strong enough terms my absolute opposition to the Section 2.2 Trail Closure Alternative. The trail system at Los Alamos is a significant factor in my residence and employment at the Laboratory. I could work in many places, but the recreational possibilities available here is a major factor in my continued employment at the Laboratory. (I personally have

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I AM PARTICULARLY CONCERNED ~~ABOUT~~ THAT ~~THE~~ TRAILS REMAIN OPEN AS MUCH AS POSSIBLE, ESPECIALLY THOSE IN LOS ALAMOS CANYON AND THOSE IN THE LOWER ANCHO CANYON AREA. → OVER

If you would like a response please provide your name and a mailing address:

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Yes	No Thanks

If "Yes", where should it be sent?

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1. ANCHO AREA TRAILS PROVIDE A VALUABLE WINTER RECREATIONAL OPPORTUNITY, WHEN OTHER AREA TRAILS ARE TYPICALLY TOO SNOWY FOR WORTHWHILE HIKING.

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3. IN GENERAL, I BELIEVE THAT THE TRAIL NETWORK ARE A SIGNIFICANT DRAW FOR BOTH POTENTIAL LANL EMPLOYEES AND TO A LESSER EXTENT TOURISTS, AND FOR RESIDENTS MAKE THIS A MUCH NICER PLACE TO LIVE THAN IT WOULD BE OTHERWISE. THUS I THINK IT IS IN LANL'S BEST INTEREST TO LEAVE THEM OPEN WHEREVER PRACTICAL.

I believe that closing all trails on LANL property to LANL employees would have a significant negative impact on the work force at the Lab.
I work at TA-46, and I use the trails behind this Tech Area frequently on my lunch hour for walks and jogs. The trails largely consist of well developed roads, and I see other walkers and runners down in the canyon virtually every time I am down there.

These trails provide a wonderful place for employees to gain some needed exercise and fresh air. The alternative is to jog or walk along the highway, which is both a dangerous and unpleasant.

The closure proposal cites the reasons as, OE²Public safety, operational security, and the protection of sensitive natural and cultural resources would be primary considerations in the establishment of such action at LANL.²

Public safety: The trails are essentially well-used roads. I do not see how they present a public safety hazard to walkers and joggers. Jogging on the Pajarito road is, as I said, both dangerous and unpleasant.

Operational Security: The trails in this area are used exclusively by LANL employees as far as I can tell. Non-LANL employees should not be down behind TA-55, TA-48, and TA-46 regardless. I fail to see how badged LANL employees are more of a hazard to operational security when they are hiking on trails than when they are at their desks.

Protection of cultural and natural resources: There are some trails, such as the Kiva Cave trail, that probably should be closed to protect those resources. However, most of the trails in use at the Lab are well developed or are service roads and do not impact cultural resources. In fact, virtually all of the land behind TA-48, 48, and 55 has been burned, mulched, and logged, which leaves little room for additional impact.

I am the manager of the TA-46 exercise facility. We have 230 people signed up to use the facility, which shows a tremendous commitment on the part of the workforce here to health and wellness. The Laboratory has historically had a supported that kind of commitment, as shown by the Wellness Center and the many programs it sponsors, and the satellite facilities such as ours. Closing Laboratory trails to walking and jogging would send absolutely the wrong message to the many employees who are striving to keep themselves healthy through regular exercise.

An additional comment: I hope that the proposal is looking hard at access alternatives to the Lab property that fronts Pajarito mountain and the canyons that run up into it. There is a great deal of well-used recreational land up there that is accessed by short easement through Lab property. Implementing a de-facto closure of large tracts of National Forest by shutting down access through a short (nonessential) strip of Laboratory property would be a travesty and would have the potential to generate a public relations disaster.

Joshua Smith

NNSA
National Nuclear Security Administration

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary. I came from Maryland to visit my friend, She was attending this meeting, so I came along. At first I wasn't really sure what it would be about, but now that I know I am ~~very~~ a bit distraught (ep²). I had never been to New Mexico before. And the more I see, the more I understand why it is called the Land of Enchantment. It is the most beautiful part of the country tha →

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
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I have EVEK seen. ~~I don't even live here, and I am~~
It would be such a shame to close such beautiful trails. Please don't ~~don't~~ close them. Sometimes I think people take for granted the ~~beauty~~ beauty of the area in which they live. I believe this is one of these instances. Please don't deprive people from seeing such an amazing part of creation.

Laura Roby
Age 15

National Nuclear Security Administration

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I don't think trails should be closed because so many people use them for recreational purposes. If ~~at least~~ they can be kept open without too much risk the community would greatly appreciate it.

If you would like a response please provide your name and a mailing address: Rachel Bjorklund
[redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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DOE. NNSA does have a public ~~reaction~~ recreational mission employed in maintaining a highly motivated scientific staff !!

If you would like a response please provide your name and a mailing address:
John B Ramsay [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?
John B. Ramsay
[redacted]

If you would like to mail your comments send them to:
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Comments to be considered in the Environmental Assessment (EA):
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Please consider economic impacts, such as quality of living in Los Alamos would go down greatly.

If you would like a response please provide your name and a mailing address:

Corry Clinton [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?

to above address

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Do not close Water Canyon, Potrillo canyon, Ancho Canyon. One hundred people / week use those canyons. As a homeowner in Pajarito Acres I use that land to exercise my horse. I have personaly repaired those trails and picked up a pickup load of trash. We horse riders have been taking care of those canyons for 40 years.

If you would like a response please provide your name and a mailing address:

Judy Young [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?

[redacted]

If you would like to mail your comments send them to:
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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

MANY RESIDENTS OF WHITE ROCK RELY ON THE TRAILS FOR DAILY EXERCISE. THEY MUST BE KEPT OPEN FOR THE HEALTH AND WELL-BEING OF LANL STAFF AND FAMILIES.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Have you considered the impact that trail closure would have on the community as a whole especially in White Rock which has very few if any recreational areas? Please do not close the trails!!

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary. TRAIL CLOSURE IS NOT NECESSARY HOWEVER - TRAIL MANAGEMENT WILL WORK IF LOCAL USER GROUPS SUCH AS "TUFF RIDERS" OR "SEARCH AND RESCUE" GROUPS ARE INCLUDED ON THE MANAGEMENT TEAM.
PERMANENT CLOSURE OF TRAILS IS UNACCEPTABLE - TEMPORARY CLOSURE OF TRAILS DUE TO FIRE HAZARDS, AND THEN REOPENED AFTER THE HAZARD HAS PASSED - IS ACCEPTABLE.
LOCAL USER GROUPS MUST BE INCLUDED ON THE MANAGEMENT TEAM

If you would like a response please provide your name and a mailing address:
MATT COVER; [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?
SAME ADDRESS AS ABOVE

If you would like to mail your comments send them to:
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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.
THE TRAIL SYSTEM IS AN EXTREMELY IMPORTANT RECRUITING TOOL FOR LANL AND OTHER COUNTY BUSINESSES. THEY MUST NOT BE CLOSED.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

We specifically purchased our property and built our home in Los Senda for the use of the trails. We have no other recreational facilities at the present time. The only thing keeping us in Los Alamos County is for the use of the trails.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Please don't close these trails! If you do you will regret it for many reasons:
- Real estate value decreasing
- No hiking ... plus much much more
- tourism decreased

Please don't study this to death. Please listen to our opinions. Please don't advertise on the local radio (no one listens to it) Get Santa Fe, Taos, Espanola, and Albuquerque Know what you are doing and see what kind of a negative response you get.

Thanks!

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

If "Yes", where should it be sent?

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Please use other side if necessary.

Please organise another actual meeting with a public discussion and LANL presentation... advertise IN ADVANCE in the Los Alamos monitor, Santa Fe New Mexican and Albuquerque Journal!
Thanks

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

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DOE/EA-1431

Predecisional Draft
Environmental Assessment for the
Proposed Los Alamos National Laboratory
Trails Management Program,
Los Alamos, New Mexico

http://lib-www.lanl.gov/TemporaryDocumentLink/g/00783373.pdf

I am an avid dog-walker - use the trails 2X each day - I try to be good samaritan - clean up after my dogs - pick up trash/broken glass on trails. As more open space is developed more people are vying for recreation on increasingly smaller, less available land - Quebec has in the past 10 (even 5) years just exploded with multiple use trail-users. I relish the peace and solitude and beauty the LANL trails afford. I've lived in Los Alamos 27 years and see our recreational land diminish and what we have is becoming heavily used - Please don't take this land away from us. This land is as sacred to me as any land the Indians say is sacred to them - it is one of the main draws for living here. Few communities boast such beauty so close to dwellings - yet so very isolated once on trails.

Department of Energy
National Nuclear Security Administration
Los Alamos Site Office

July 14, 2003

Kathy Clifford
[redacted]

National Nuclear Security Administration

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Comments to be considered in the Environmental Assessment (EA):
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The Trails Management Program is an unnecessary expence to the public. It is not necessary & will restrict the public. It will be extremly costly, & impossible to enforce. I truley hope you do not implement this program.

If you would like a response please provide your name and a mailing address:

David Francisco
[redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?

[redacted]

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closing or severely limiting the recreational use of the area south of Pajarito Acres would be a disaster for our community. This is the only extended recreational area close to White Rock. Its availability and use for hiking and horseback riding played a major role (and hopefully continues to do so) in the attraction to new hires to the Lab. (It did for me and my family). It is also an important area for training of rescue dogs (-st Mountain Canine Corps).

If you would like a response please provide your name and a mailing address:

J. Birn, [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?

address above

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The population (residents) of LA County are underrepresented on the proposed (?) group of cooperating agency. LA County government of the only one representing residents, all of the others are non-residents. This could lead to a very biased set of recommendations against the interests of the people most affected.

If you would like a response please provide your name and a mailing address:

Hilland H. Howard [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

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It appears that the socioeconomic and health and safety impacts of the Alternative & Proposed Action may be too narrowly focussed to address actual/real effects. Should consider property values, ability to exercise, practice, etc in economic & H&S resources.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

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Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Los Alamos Pony Club and Pajarito Riding Club would be happy to help ~~with~~ with the trails behind Pajarito Acres.

If you would like a response please provide your name and a mailing address: Nora Aubert
[redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ✓	No Thanks

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Don't forget to use Pajarito Riding Club and Los Alamos Pony Club as resources for
1) Trail Identification
2) Hazard/trail condition alerts
3) Trail fixups (we already do trail fixups every month!)

If you would like a response please provide your name and a mailing address:
Nancy Ambrosiano (of both of the above orgs)
[redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks

[redacted]

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
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Public Meeting
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Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary. Los Alamos Pony Club and other horse owners in the area would like the trails to stay open because they are the only place nearby to trail ride and condition our horses.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ✓	No Thanks

If "Yes", where should it be sent?

Laura Ambrosiano
[redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

I was not able to attend the EIS public comment meeting of July 30, but would like to comment if there is still time.

I am a mountain biker and use the trails within LANL boundaries. I am firmly opposed to any closure of these trails for public use. These trails are on public land and should continue to be available for public use. Security areas can be protected from perceived threats by fencing and security services. The alternative to eliminate public access is analogous to preventing road fatalities by eliminating driving; it will certainly work, but is not in the public interest.

LANL has recognized that cyclists pose little or no threat to government facilities and I urge you to take the same approach with recreational users of LANL trails.

Thank you for the opportunity to comment.

David Shrimpton, Sr. Project Manager

DOE,

The option to close DOE land for recreational use should not be considered at all. Most of the DOE land on which people hike, ride, and bicycle is not used for anything else and isn't even considered for other uses. It has no (significant) cultural resources that need protecting. In limited locations there may be cultural resources that do need protecting, but that can readily be done without impacting most of the area in question. Furthermore, DOE land is already protected heavily in that uses is limited to non-motorized vehicles, no hunting, trapping, or shooting, etc. This is sufficient.

Los Alamos is embedded in DOE owned land. Land transfer to Pueblos is already taking quality recreational land from Los Alamos citizens. Removing more land that would then sit unused is a travesty.

This smacks of creating a task for people and not of a sensible consideration.

I believe the "do nothing" option is the most logical, followed by doing almost nothing except protecting limited clearly cultural resources.

Wendy Soll

Dear Ms. Withers;

Please accept these comments regarding the
PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED LOS ALAMOS NATIONAL LABORATORY TRAILS MANAGEMENT PROGRAM, LOS ALAMOS, NEW MEXICO.

As a LANL employee and resident of Los Alamos County, I regularly use trails within LANL for recreation and fitness. I strongly oppose the closure of trails at LANL. **The public should continue to have access to trails while the trails management plan is in development.**

Los Alamos residents have reduced access to hiking and running trails due to closures at the San Ildefonso boundary, the LANL boundary, and the Cerro Grande Fire areas of the Santa Fe National Forest. These closures make access to trails on LANL even more important to the quality of life and the health of local residents. Reduced outdoor recreational opportunities also reduces the business opportunities of local shops which profit from supporting outdoors recreation, such as bike rentals and equestrian supplies.

As a LANL employee, I rely on access to trails at LANL for daily exercise. Restricting hiking and running to paved roads reduces the quality of the work environment for LANL employees.

Thank you,

Steve Koch

Monday, August 4th, 2003.

Elizabeth,

Please accept this email message my as my public comment on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program.

First, given that very little public notice was provided regarding this matter I think that DOE/NNSA should extend the public comment period beyond tomorrow's date of August 5th, 2003. I was made aware of last Wednesday's meeting shortly before it occurred, already had commitments and could not attend. I was only today, August 4th, provided with information (your address) on how to provide written input.

I am strongly opposed to a wholesale closure of ALL trails on LANL property.

As a LANL employee and Los Alamos resident, I have routinely use these trails for recreation and fitness. In the past few years LANL has made a really big deal about _HEALTH_ and safety here at the lab. Closing all trails would in my opinion, severely impact the ability for many of the LANL workforce to maintain and improve their health. Many of us due to location or time constraints or preference can't go to the gym, but can easily access LANL trails to exercise or walk. In addition, when the trails near my office are open, I often go for walks to think about work.

I also believe that the local trails both on and off laboratory property are the towns biggest asset. I now live in Santa Fe, but lived in Los Alamos for 6 1/2 years from Jan 92 to Jun 98. As a former resident who still works at the lab, I will say that the biggest thing I miss about Los Alamos is the trails. Had this proposal been enacted during the time I lived here I would have strongly considered leaving the laboratory as the local trails and the recreational opportunity they afford are in my opinion one of the few positive things living in Los Alamos offers. I currently hear that many people will leave Los Alamos if the UC Contract goes away. I know many people who live in Los Alamos who would further consider leaving if the trails were closed. I know that DOE/NNSA is concerned about retaining the workforce. They should consider this.

I will admit that due to the Cerro Grande fire there are are sections of current trails that that may dangers due to falling tree hazards, however the solution is not to close the trails but to remove those hazards in the areas where they exist. Even if trails are closed to the public and general LANL workforce, programmatic access to these areas will still continue. Shouldn't these trails be made safe for those that are required to work there and if so doesn't that solve expressed safety issues? There may also be trails that pose security risks, but the solution is to not close those trails but allow the insecure sections to be rerouted.

With respect to trails that might provide access to tribal lands, it has always been my understanding that accessing those lands was off-limits and I have to the best of my ability honored that. Instead of closing those trails the solution might be to better educate the public that tribal lands are off-limits. In addition maybe the Lab and the Pueblos should provide signage where trails do access or offer the possibility to access those lands. The signs could even be placed on the trails at a distance from the actual tribal boundaries, i.e., saying please turn around now.

There are also many LANL trails on the perimeter of the lab that if closed would as a result close trails on public lands. I know this because many public trails are currently inaccessible due to current LANL fire-danger-related closures. This is my biggest problem with the proposed wholesale closure of ALL LANL trails -- not that the LANL trails will close, but that non-LANL trails will become permanently inaccessible because of the LANL closures.

Reading the draft it appears that it was written by people that have never and will never use the local trails. I strongly urge DOE/NNSA to consider a plan that balances safety/security and quality of life instead of the easier bureacratic solution which is wholesale closure.

Please send any correspondence to this email address or to:

Brad Perkins

Ms. Withers,

I did not attend the meeting you held in Los Alamos regarding studies to determine the future disposition of canyons and mesas owned by DOE and now open to the public. There was little advance notice of the meeting, but I am writing to comment as requested in the Los Alamos' Monitor's article reporting your meeting.

I am disturbed by the comment attributed to Mr. Dan Pava suggesting to the reader that the present de facto "do nothing" policy requires revision. Doing nothing has worked well for over 40 years. Evidently only scientists and engineers are taught that if it ain't broke, don't try to fix it!

I can find no justification that the trails complex requires the evaluation that you propose to make. It seems to me that it is possible to find a regulation that requires you to spend taxpayer dollars, albeit for no really good purpose. I personally intend to recommend to my elected representatives that the the studies you are proposing be treated as career-ending, or at least career-limiting for those who plan the study. One would like to think that the local area office of the DOE is much closer to the issues than the Albuquerque office. In thirty years of working for AEC, ERDA, and now DOE, I have been impressed with the futility of dealing with the Albuquerque DOE office. Once again, people from Albuquerque are offering us all the assistance possible short of actual help.

I live at 160 Monte Rey South, directly across from a main access trailhead leading to DOE land that is open south of Pajarito Acres. I have lived at this location for about 30 years, and have been through three major forest fires, the La Mesa, Dome, and most recently the Cerro Grande fire. Fire from Pajarito Canyon isn't a particular danger because it has never supported a population of large conifers that can support a crowning fire. Perhaps I am a naive scientist to believe that a forest is required before one can sustain a forest fire? Perhaps the seasonal closures you suggest are necessary to prevent virtual fire? My recollection is that the most serious fires in Los Alamos history were caused by the U.S. government's effort to prevent a major fire. Your fire argument isn't likely to sell in this town.

Fire is even less a danger following the wholesale clearing that the DOE conducted to remove dead and dying Pinons, and evidently any other tree that got in the way of the heavy machinery that was used to clear the land. I am not amused by the logic that closed formerly open land, for example lower Water Canyon, because it was deemed too fragile for public use. I regret to inform you that the DOE's contractors used tracked vehicles to completely destroy these fragile lands. Evidently you hired the lowest bidder to do a job best left for nature to heal. I comment that you omitted to discuss that the DOE made only token effort for remediation of the land. Remediation was made to repair the contractor's damage. The ruts were smoothed, more or less, and antiquities marked but no new trees are planted. You did not make the best argument for potential closures, viz. that the public would be prevented from knowing how badly the DOE has treated this land. Very little remains here that requires the DOE's assistance, but we could use a little help.

The matter of access to Pajarito Canyon requires that you be given a history lesson. Perhaps owing to short government careers, none of the DOE representatives seem to know why the land is open for public access. Forty years ago, the land that is now occupied by Pajarito Acres and La Senda was sold by the AEC to prospective home owners and land speculators, respectively, to create the only rural-agricultural zoning in Los Alamos county. Access to Pajarito Canyon and the land East and South of State Route 4 was an incentive for horse-owning home-owners to build in Pajarito Acres, and later for the developers of La Senda to extend the Pajarito trails. The trail system in these developments was constructed specifically to provide access to the land that was retained by AEC. Today, the DOE continues to hold title to the land because doing so benefits the residents of Los Alamos county. Keeping these DOE lands open for public use supports our community.

People in Albuquerque cannot be expected to understand the remarkable history of the government-held land in Los Alamos county. However, you can be expected to understand the statements made by the present and past DOE Secretaries and the NM congressional delegations that mandate support for the communities nearby DOE facilities. Your statements as reported in the Los Alamos Monitor article lead me to believe that you understand neither forest fires nor the DOE's stated policy. The DOE retains title to the land you want to study because keeping it open benefits the community, and has done so for over forty years.

In my opinion, a trails management plan by the DOE is neither desirable nor necessary. The Pajarito Riding Club and the Los Alamos Pathways organization have shown that the community is perfectly capable of meeting the requirements of riders, hikers, and the trail-using public. Thank you for your offer of assistance, but it is not needed here. Future issues that may arise can be handled perfectly well by citizen groups and the local Los Alamos Area Office of the DOE that is more properly our point of government contact. I believe from the Monitor's reporting of your meeting that you received this message from many citizens concerned about your proposal for a study to consider changing what has worked well for nearly half a century. My comment to you expands on their message.

Maxwell T. Sandford II

To whom it may concern:

I am the leader of the White Rock Senior Center Walking Group. We take walks every Friday, many of which are in Los Alamos County. We are accustomed to use many of the trails listed in "Fifty Hikes in Los Alamos County" and in the books by Dorothy Hoard and Craig Martin. The closing of the trails on DOE land has not impacted us this summer, because we go further up into the mountains, looking for cooler routes. However, as the fall approaches, we usually use the trails closer by, namely off Route 4 and Route 501.

Moreover, we frequently meet other people enjoying these trails. I can understand closing trails because of fire danger, but after the summer is over I hope that they will again be available to the public. It would be a shame for all the people who enjoy hiking, walking their dogs and horseback riding to be deprived of this healthy exercise.

As for trail maintenance and signage, I suggest leaving them alone. Those who use them have no difficulty finding them, and although some are eroded, that doesn't seem to be a major problem.

I am also concerned about being ticketed along 501. We plan to hike the American Springs road in Sept. and we usually leave a car at the water tower on 501 so we can hike all the way down. We we have to worry about getting a ticket? We also hike upper Pajarito Canyon, which invoves pulling into a parking area off 501. Is this a ticketable area?

I strongly urge you to remove the ban on using these trails at least by September. Please advise me of your decision.

Mary A. Nunz

Please accept the following input re: the trail management proposal.

1. THIS PROCESS HAS LACKED PUBLICITY AND OPPORTUNITIES FOR INPUT. I strongly suggest you re-publicize this process in the CONVENTIONAL way, via PRESS RELEASES to ALL local news outlets, including the paper I read, *The Santa Fe New Mexican,* well in advance of the "informational" gathering. My comments about your ads are: (1.) I rarely see them and (2.) when I do they usually provide inadequate information to understand what they are about.

2. This is the information age. Someone should not have to physically go anywhere to get information about this proposal or make phone calls. Make the draft of the proposal available ONLINE.

3. ALLOW LONGER FOR COMMENT. We learn of this on July 30 and comment is due by August 5? Outrageous.

4. Bearing in mind that I have not read your draft proposal, since the copy my husband requested more than a week ago has yet to arrive, please accept these additional comments. While the *Los Alamos Monitor* may have depicted otherwise, I am a hiker and I share the Pajarito Riding Club's concerns about **any** trail closures. I am firm in my belief that ALL TRAILS should remain open, although they should also be adequately maintained and patrolled.

5. I find the neglect of DOE lands, especially considering that they are near some of the premier archeological sites in the Southwest, to be appalling. I just can't help but feel that an agency with a $2 billion a year budget for the operation of LANL cannot find a few hundreds thousand dollars to hire professionals to oversee, better patrol and provide upkeep of these facilities. Why, for example, is it only civilians hauling trash out of these areas? Why are so many abuses, such as the cutting of new unauthorized trails, unauthorized vehicle access and ongoing erosional problems, allowed to go unaddressed?

5. While, in conclusion, I support the idea of a trail-management program, I am profoundly concerned that the trail-evaluation program might "take 10 years." THAT IS TOO LONG. The damage is now, it is ongoing, this should not take 10 years. I urge the DOE/National Nuclear Security Administration to move expeditiously, prioritize areas in urgent need of attention, and attempt to have this program up and running IN FIVE YEARS OR LESS!

Thank you for this opportunity to comment.
Kathleene Parker

Elizabeth,

As a concerned resident of White Rock, NM, who has hiked many of the trails under consideration for "a trail management program" or closure action around WR and in the rest of LA county I have a few comments.

1) In the 25 years I have hiked the trails I have never seen significant destruction by vandalizism or hiker caused fires in the vicinity of any trail. The only damage has occurred in areas in the Jemez used for parties or intentionally burned by the forest service that got out of control. The hikers, bikers, and horse riders that use these trails have never damaged them and no reason exists from that perspective to consider any action other than leaving a good situation well enough alone.

2) The trails near WR have now been damaged unbelievably by contractors working for LANL under the guise of fire mitigation. The work has decimated the remaining forest leaving exposed ground that is already eroding and will continue to erode for years, in the misguided belief that somehow a fire could start and devastate WR. In fact, in the early 1980's a fire did occur (lightening cause I think) in WR canyon south of WR. It was unable to spread due to the nature of the terrain and the sparse low growing pinon forest, and by the way the very hikers, bikers, and horse riders you are considering punishing by closing access to the trails we

3) The trails under discussion, in the WR area, are well established, and provide a recreational resource beyond value. Those near LA serve the same purpose, and were hurt severely by a government activity that was allowed to get away from the people who caused the Cerro Grande fire. Again, a case of trying to cure a problem and causing a worse one.

Leave these trails as they are and put the money and effort into restoring the LA trails and extending that system, rather than contemplating "managing" or closing the trails we all use. There is nothing wrong with the present open system. Leave it alone.

We have had a great example of how well our government manages our resources in the fact that even today, years later, we are still not able to access the Valle Caldera region that we the taxpayers spent 90M$ on. The only folks able to use it are those willing to pay exorbitant amounts simply to walk 3 miles on an old dirt road, or even higher amounts to fish in a stream they own.

If it ain't broke, don't fix it.

Leave my trails alone and let me continue using them.

Bob Watt

I read the LANL Bulletin Board item on July 17 about a public meeting concerning a Trails management Program. One passage in the item got my attention:

"The trails closure alternative would result in the closing of all existing trails to the public and Laboratory workers for recreational use purposes."

As one of the many LANL employees who regularly use the trails for running and bike riding (except of course under the present fire closure), the possibility of a complete closure concerns me greatly: access to the trails is one of the added benefits of working here. Closing the trails would seriously degrade the quality of the work experience for many people.

I am opposed to the possibility of closing the Lab trails. I hope that the proposed trails management program includes other, non-closure options ?

Richard Hughes

Thank you for the opportunity to comment. It is unfortunate that the NEPA process resulted in a total closure alternative, which had the effect of focusing attention on that rather than the actual management program proposed. I believe the total closure idea is untenable - it would lead to various kinds of protest including trespass, and likely legal or legislative action to force DOE to reopen the trails to their historic open access.

A Trails Management Program is a good idea. If properly executed, it will best satisfy the needs of trail users and environmental stewardship. If the trails were simply closed, management would tend to ignore the trails, which could lead to erosion and loss of the historic routes and rights-of-way. If the trails were left in their present unmanaged situation, maintenance, erosion, and growth of unwanted shortcuts and social trails issues would continue.

The EA could adopt a more positive tone in discussing the preferred alternative. Trail availability is an important quality of life factor in living and/or working in Los Alamos. The proposed Trails Management Program would make these trails even more attractive.

I would like a copy of the final EA and FOSI. Please mail to Roger Perkins,

As a member of a volunteer Search and Rescue organization, Mountain Canine Corps, I would like to let you know how important much of the DOE land is to us. We train as a group two times a week throughout the county with our canine search partners. It is important to our training to use many different areas so that the dogs do not become used to working only in certain places. The fire certainly had a negative impact on our training, and I foresee the closure of DOE land as also being a negative factor. Please keep these areas open to the public so people like us can use them, enjoy them, and appreciate them. We see ourselves as servants of the public, just as the DOE is a servant of the public. Let's please work together and keep the land open to both volunteer organizations, and those enjoying recreational activities. Thank you for considering this in your decision.
Terry DuBois, Mountain Canine Corps member since 1986.

Comments to be considered in the Environmental Assessment (EA):

A brief look at this report seems to suggest problems far more serious than actually exist. Matters such as inconsistent signs should be easy to fix. If other jurisdictions are concerned about access, that is for them to work out. Safety is hardly a consideration, let alone a justification. It is hard to imagine a safer activity than hiking trails; risks of sprained ankles are far outweighed by increases in depression from a feeling of confinement, especially confinement for arbitrary reasons.
Beginning with the Manhattan Project there was a recognition that Los Alamos is an isolated area and there should be opportunities for recreation as a means of maintaining morale. Los Alamos without convenient access to the outdoors, or even with reduced access, is a devastating prospect.

NNSA has a limited mandate for providing recreation. It also has no mandate for making miserable the lives of its contractor employees. The best option is to do as little as possible and to keep present trails open.

If you would like a response please provide your name and a mailing address:
T. J. Shankland

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

On page 8, the "Pertinent Trails Issues" all point to the closing of the trails. More emphasis should be placed on the historic use of trails by LANL and public. It should also include the fact that the work force and the community have significantly benefited by access to the trails. For example, being able to take a walk or bike ride at lunchtime is both a physical and mental health benefit. I don't think anyone who doesn't live here or who is not physically active can appreciate the significance of the access to trails issue. The availability of these trails played a large part in my decision to work here. The specter of having to drive someplace to take a walk makes me cringe and wouldn't help the environment or my piece of mind much. Having the trails closed because of fire danger is bad enough, having them closed permanently would significantly affect myself and many others.

On page 11, the first paragraph of section 2.0 says that closing the trails is a reasonable alternative. I disagree. This is an extreme and unreasonable alternative in my opinion. But due to budgetary constraints and liability fears, it could well be the most attractive alternative to bureaucrats.

The overall management plan proposed appears to downplay the importance of the current use of the existing recreational trails at LANL. The management plan appears to me to be over-management and portends significantly restricted use of existing trails. It also appears to be expensive and personnel intensive. While I applaud efforts to get things in order and hire more environmental professionals, my past experience is that a too ambitious plan is doomed to failure, especially when priorities shift away from those outlined in this EA (as they most surely will in times of budget crises).

As a side note, if we're worried about vandalism of existing cultural resources, highlighting them with pink tape tends to attract attention rather than restrict it. Personally, I rarely leave the established trail to go exploring, but pink tape on trees, fences, or bushes is like an invitation to go see something interesting.
Thank you for this opportunity to comment. I would like to be involved in employee or local groups pertaining to this subject. I will even volunteer for trail maintenance.

Kathleen M. Gruetzmacher

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA): Please use other side if necessary.

Trails are an important part of Los Alamos county.
They are used by Los Alamos residents and visitors.
They are used by employees at NNSA and LANL.
They provide exercise and recreation for many people
Several of the trails are historic.
Several need improvement, but they are all needed.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes	No Thanks X

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.

Ms. Elizabeth Withers
528 35th Street
Los Alamos, NM 87544

Re: Public Comment to the NNSA Report "Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico," July 14, 2003

After reading the report on Trails Management at LANL, it seems that the options presented are to either shut down use of all trails immediately, or shut down *almost* all trails slowly and painfully, in an expensive and beaurocratic way. Opening new trails would be a last priority, done by committee.

The main use of these trails is recreational, and yet this factor is hardly considered at all in the report. There is a value to LANL and NNSA in having healthy employees and a satisfied community. The report is very concerned with addressing the needs of the neighboring Pueblos, but never mentions addressing the concerns of the local community in Los Alamos.

The discussion presented does not convince me that this will result in a "balanced" use of the trail system. I don't understand why they dismissed as unfeasible the alternative to study each trail individually. Their argument appears to be that they can't study them individually because they have to study them all at once.

If you just read the report, the option to shut down the trails seems obviously the best choice in terms of cost-effectiveness. It makes the Pueblos happier. It addresses safety concerns by disallowing all use. It's the cheapest alternative. Since the local community and recreational use of the trails isn't a consideration, there's no disadvantage.

It appears that a request from the County for access to 14 trails will be met with an answer of closing down most of them. The Lab has been dragging its feet for years on opening up land to the public. The DOE land has too many unknown dangers dating back to the race for the bomb, when there was indiscriminate use of the land for experimentation. Now instead of resolving those problems and making more land available, I feel as though the trails that were open to the public all this time are under attack, at risk of being shut down.

I know there are safety, hazard, and environmental problems that need to be addressed for the trails. But the proposed plan doesn't put enough emphasis on keeping the trails open to the public. Not only should there be emphasis on keeping the trails available, but the goals should go beyond that, to transfer land to the County.

Wherever possible, the trails should be transferred to Los Alamos County. The County could then take on responsibility for environmental assessments and determine appropriate "balanced" use of the trails. If NNSA must maintain control over the trails, the proposed LANL Trails Management option does not appear to be in the best interest of the public. A more stream-lined management option is needed. There ought to be an "innocent until proven guilty" concept for the trails. Instead of conducting all the expensive and time-consuming studies listed in the report, keep all the trails open and study only those for which specific threats have been documented.

Furthermore, study the trails only to determine if there are security concerns for lab operations, or nuclear hazards on the trails themselves. This is within the mission of NNSA. If neither of these problems exist, transfer the trail to the County and let them handle the environmental impact studies, Indian's social concerns, and other issues. The local County is better able to determine local issues and concerns, and would do a better job at considering the Los Alamos residents than the management plan proposed in this report.

Sincerely,

Sonya Lee

Sonya Lee

I am one of hundreds (thousands?) that use the trails on DOE property for hiking, nordic skiing, running and mountain biking. These activities constitute one of the most important aspects of my work day, and are facilitated by the fact that I can leave from my office door and be in the forest. PLEASE do not close access to trails on lab land.

Paul A. Johnson

Dear Ms. Withers:

I have read the LANL Trails Management Proposal and prefer the Proposed Action, establishment of a Trails Management Program. The Trails Closure Alternative would be devastating to residents of White Rock--we love these trails (especially Potrillo, Water Canyon, Ancho Canyon, and Mortandad.

It would be good for everyone if these trails were signposted and maintained more ecologically.

Is a map of these trails available somewhere? I was uncertain about Broken Mesa and Painted Cave (presumably not the Bandelier Painted Cave).

Thanks for inviting comment.

Thomas and Rebecca Shankland

Dear Ms. Withers --

I would like to add my voice to those who are against the closures of so many of our favorite trails. I am a resident of the Western Area and one of the joys of my life in this town of limited entertainments is my daily dog walks on the local trails.

I can understand the need to close many of these trails during these times of high fire danger but to close them (perhaps permanently?) for "security" reasons seems impractical to me. How many staff will it take to patrol all the trails? I feel that to allow local citizens and Lab employees access to the trails gives you a free "citizen patrol". I'm sure many of us would be willing to work with DOE on trail maintenance and safety issues, as we are already doing with the various local trail committees. I hope we will be given that opportunity.

I also hope that we will be notified of meetings about the trails in a more timely fashion so we have an opportunity to make our voices heard.

Thank you for letting me put in my two cents worth.

Molly MacKinnon

Hello,

My wife and I live in La Senda and for almost 30 years have enjoyed hiking in the government land south of Pajarito Acres. Of course, we would hate to see that privilege denied to us. On the other hand I believe a trails management study would be very useful to both hikers and the environment. Marking of trails suitable for hiking and horseback riding would be useful in keeping people from creating new trails. Also, some of the current "trails" should be improved since they have deep gulleys in them.

Sincerely yours,
Charles & Linda Anderson

I am part of the dog team of Mountain Canine Corps. As a canine unit it is very important that my dog and I maintain our excellence in the skills needed to locate and rescue persons gone missing.

I am sure if you or your love ones were in such an undesirable circumstance, you would thank the powers that be, that a Search and Rescue dog came upon you and resulted in saving a limb or even your life.

Please use your influence revise the proposal to allow for lab land use for canine Search and Rescue practice. Thanking you in advance for your assistance in this very important matter to the community.

Sincerely,
Saundra I. Costick
Sandi Costick

I believe it is important to allow access to as many undeveloped lab areas as possible for jogging, hiking, and mountain biking at lunch time or after work for recreational and fitness purposes. Running or walking on the highways is very dangerous, and lack of opportunities for physical fitness would impact job quality, performance, and morale.

Norbert Ensslin,

I would like to comment on the "Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program". Nowhere in the document is there any consideration given to the benefits to Laboratory workers provided by the recreational use of these trails on Laboratory/DOE property. Every day, one can see hundreds of Lab workers outside during lunchtime walking, running, and cycling on these trails, which benefits all involved - the employees, the Laboratory, and the DOE. On the one hand, the Laboratory tries to promote the physical and mental well-being of its employees, and then it acts as if it has no interest in such matters by proposing to shut down the trails that are so beneficially used by its employees. The users of these trails stay on the trails; therefore, they have little or no impact on nearby sensitive natural or cultural resources. I urge you to keep these trails open to employee use and, where permitted, to general public use.

Schillaci

Dear Ms. Withers:

Thank you for the opportunity to comment on the draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program.

We are cautiously optimistic that the Proposed Action will result in a better, more clearly defined trail network within Los Alamos County. However, we believe that the need for security and cultural sensitivity must be balanced with the need for a community-wide, interlocking trail network for transportation and recreation. Access to a nearby trail network is an invaluable tool in the recruitment and holding of employees at LANL. For a large number of employees, the trails provide a quick, mid-day break from high-stress jobs. The trails are part of the cultural framework of Los Alamos.

We have the following concerns with the proposal:

The proposed trail working group should include citizen involvement by trail users. It should not be composed solely of managers who do not have a fundamental understanding of the value of trails to the Los Alamos community.

Trails that connect the community with the laboratory are of critical importance to the Los Alamos County Trail Network.

The initial assessment of the trail system should not take more than six months. Following the Cerro Grande Fire, 100 miles of trails were assessed in three weeks for a total cost of less than $2,500.

The trail plan should include a provision for building new trails on DOE land holdings where appropriate. An example is the community-based Perimeter Trail, which, with the exception of a 1.5 mile section on DOE land holdings, links the community from Barranca Mesa to Bandelier National Monument and traverses private, County, and National Forest Service land. Completion of this trail through DOE land holdings along New Mexico Highway 501 would demonstrate the sincerity of the current LANL directives toward cooperation between the community and the laboratory.

Sincerely,

The Trails and Pathways Subcommittee of the Los Alamos County Parks and Recreation Board

Craig Martin
Sarah Gustavson
James Sprinkle
Georgia Strickfaden
Kathy Campbell

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

the use of Lab lands for horse trails, walking dogs etc. is a much appreciated benefit of living in White Rock. While we understand temporary closings for fire danger, please do not make these canyons + mesas off limits at other times of the year. Please consider the opinions of the local residents in your final decisions.

If you would like a response please provide your name and a mailing address:

Louise Jandacek, [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ✓	No Thanks

If "Yes", where should it be sent?

Louise Jandacek
[redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

Environmental Assessment DOE/EA-1431 urges the adoption of a trails management system at Los Alamos National Laboratory, or suggests wholesale closure of the trails as an alternative. With all certainty the Closure Alternative is entirely unacceptable. While the Proposed Action Alternative is preferable to outright trail closure, the merits of the Proposed Action are questionable, as the Proposal does not provide assurances of the scope of the final actions. I agree that the reasons cited in the EA are sufficient to demand a trails management program. However, the Proposed Alternative is inchoate: it states that something must be done, but states only what may be done, including loss of trails. Thus, the Lab community must weigh a proposal whose consequences will not be known until the Proposal's project planning stages are underway. Since it is possible under the terms of the Proposed Action Alternative for an indeterminate amount of trails to be lost, in the worst case the proposed trail management plan may result in a substantial reduction in the amount of available trails. This is an unacceptable outcome, as it would be a detriment to the quality of working life at this institution.

In order to provide a zero-to-small net loss of accessible trails, the Proposed Action Alternative should be amended to explicitly include conservation of trails as a priority goal: close one trail, open another. In addition, it would be sensible to perform a specific initial project plan for a number of trails that is then put forth for public examination before the overall trail management plan is set for final approval. In this way the community can better understand the consequences of implementing this trail management system at Los Alamos.

Compromise of the trail system through adoption of either the Closure Alternative or an improperly conceived Action Alternative would constitute an egregious disregard of the well-being of the Lab community. Not only is this resource a boon to those already in LANL's employ, but it serves as a legitimate incentive to potential new hires who value access to the great natural beauty of the Lab environs. I support the adoption of a trails management program, but I encourage the National Nuclear Security Administration to redraft the present Proposed Action Alternative to better insure that one of the most valuable employee resources available is in no way diminished.

Sincerely,

Andrew Saab, Ph.D.

I use the trails mentioned in the EA on almost a daily basis, at least on an every other day basis. This includes weekends. One of the benefits to working in Los Alamos County and at the Lab in particular is the access to a variety of fitness trails on which I and my friends run, hike and mountain bike. I moved out here from the East coast and the closest trails we could find were many miles away. I am a fitter, healthier person since moving out here, and I believe access to off-road trails plays a big part in this. I would hate to see the closure of these trails, as I do not see the impact of that on Homeland Security. A Terrorist threat is much more likely to be considered effective on a major transportation route than via a small trail.

Sincerely,

Amy Regan

LANL employee

NNSA
National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm - 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.
I disagree strongly that the socio-economic effects of complete trail closure would be minor! Residents of Los Alamos have been through many stressful events since 2000. The threat of possible eventual closure of all trails will continue to lessen morale and add to the escalating cost of health and mental health insurance.

(CONT ON BACK)

If you would like a response please provide your name and a mailing address:
JERRY BUCHHOLZ, [redacted]

(CONT ON BACK)

Would you like us to send you a copy of the final EA and Finding of No Significant Impact? (HOW DO YOU KNOW THERE WILL BE NO SIGNIFICANT IMPACT)

Yes | No Thanks

If "Yes", where should it be sent?
SAME AS ABOVE
[redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

Property values would be lowered by a considerable amount in Pajarito acres. a selling point for these houses is the trail system in Potrillo and Water Canyon. trail closure would cost home owners big $s.

Mountain Canine Corps
P. O. Box 238
Los Alamos, NM 87544

03 AUG -4 PM 3: 19

August 2, 2003

Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street
Los Alamos, NM 87544

Comment on the Predecisional Draft Environmental Assessment (EA) for the Proposed Los Alamos National Laboratory (LANL) Trails Management Program (DOE/EA-1431)

As president of the Mountain Canine Corps (MCC), I am writing on behalf of its membership. MCC is a nonprofit volunteer search and rescue (SAR) organization. We believe that the Proposed Action of LANL Trails Management Program and the Trails Closure Alternative would negatively affect our team's ability to adequately prepare for missions, and, therefore, negatively impact both socioeconomic and health and safety resources locally and nationally. We also believe that these impacts were not considered in the writing of the draft EA.

Our team was founded in 1984 and is based in Los Alamos, NM. Our mission is the training and fielding of search dogs to help locate missing persons; we save lives and recover bodies. MCC is a member of the New Mexico Emergency Services Council and is recognized by New Mexico's Search and Rescue Review Board. We focus primarily on training for and participating in SAR missions in the wilderness settings of the State of New Mexico. We extensively use the areas that would be affected by the Proposed Action and the Trails Closure Alternative. Specifically, we use the following areas for our training practices and for mission readiness certification examinations:
1) Rendija Canyon, area north and west of Sportsmen's Club,
2) TA-62, area west of West Road, north of NM 501 and both sides of Ski Hill Road,
3) TA-58, Fitness Trail area
4) TA-08, unfenced areas east and west of NM 501,
5) TA-72, area west of Rt.4, south of NM 502, lower Los Alamos Canyon and both sides of East Jemez Rd., east of the PTLA Firing Range, and
6) TA-70 and TA-71, areas south and east of Rt. 4, west of Pajarito Acres, north of Ancho Canyon.
A map with these areas can be found in Attachment 1. Changes to access to these areas under either alternative would adversely affect our team's ability to train and test. In the past few years, we have already been adversely affected by the loss of practice areas. For example, the area that is currently being transferred in the Rendija area was previously used as an examination area and other areas, such as Quemazon, have been lost to development. The Cerro Grande fire also caused the loss of suitable areas for training. Our team is losing habitat.

In particular, the impact on health and safety resources, because of effects of the Proposed Action or the Trails Closure Alternative on our team, should not be underestimated. We are now one of the largest wilderness canine SAR teams in the nation and currently composed of 40 (human) members, 16 mission ready dogs, and 6 dogs in training. Of our canines, 5 dogs are mission ready in air scent, 10 are mission ready tracking/trailing dogs, and 8 dogs are mission ready in cadaver location. We are on-call for missions 24 hours a day, 7 days a week. Although our focus is primarily on wilderness SAR, we have also fielded dogs after disasters, including the tornados in Okalahoma City. One of our canines and handlers served at the Pentagon after September 11th as part of FEMA's New Mexico-Task Force 1. Two of the more recent examples of our contributions to SAR in the news headlines are: "Canine Corps solves missing person case" (*LA Monitor*, Nov. 2002) and "Search and rescue team saves resident's life" (*LA Monitor*, Sept. 2002). A letter from the New Mexico State Police Resource Officer James Newberry that explains our contributions to the health and safety of the citizens of New Mexico can be found in Attachment 2.

In order to properly train both our canines and personnel for SAR missions, we require the frequent use of practice areas that are as varied as possible in both terrain and vegetation. We train twice weekly throughout the year. Approximately 80% of our practices in the last year have occurred in LANL land areas that would be affected. During the winter, we use the LANL land areas almost exclusively. As mentioned above, we are a team of all volunteers and most people on the team hold full-time Laboratory positions. Therefore, traveling a great distance to a practice location is not feasible for most team members. Moreover, limitations on the team's ability to use these areas for training will negatively affect the quality of our search dogs and the preparedness for missions. Ultimately, these limitations would impact the health and safety of the citizens of New Mexico. We not only save lives, but our contributions are also well appreciated by the local communities. We leave a positive image of the people of Los Alamos, fostering good community relations. In addition, our team hosts mock searches, bringing other New Mexico SAR teams into the area for joint practices. Therefore, we also believe limitations that arise from the Proposed Action or Trails Closure Alternative would also impact the socioeconomic welfare of our community.

We would like to suggest that the environmental consequences in the draft EA be reconsidered with user groups such as ours and other local search and rescue teams in mind. We respectfully submit some specific suggestions for additions and changes (highlighted in italic font) to the draft EA, which are outlined below, for your consideration.

Section 1.3 Statement of Purpose and Need for Agency Action
Add text of *"LANL social trails and undeveloped areas also have been used extensively for training and testing volunteer search and rescue personnel, including canine search teams, mounted search personnel, communications, high angle rescue and medical teams."*

Section 2.1 General Overview of Proposed Action
Broaden to read "Workers at LANL, officially invited guests, *and other approved groups performing tasks explicitly requiring use of a trail closed to recreational users* may be permitted to do so."

Section 2.1.1: Establishment of Trails Assessment Working Group.
Development of End-State Conditions and Recommendation to Close or Maintain Trails
Amend last two sentences to read "Options could include restricted use *by workers at LANL, officially invited guests, and other approved groups performing tasks explicitly requiring use of trails*; or could be open to the general public for recreational purposes. The appropriate options for end-state trail use would include non-motorized modes such as walking and hiking, horseback riding, cross-country skiing, bicycling, and *the training and testing of search and rescue dogs and personnel.*"

Section 2.1.4 Safety Measures; Public Safety Measures
Add sentence to read, "Certain trails could be appropriate for equestrian use or for dog exercise use; access to these trails would be suitably provided and the trails would be appropriately posted. Other trails could be posted informing users that horses or dogs would not be permitted and trail access would exclude horses or dogs accordingly. *Use of these trails for the training and testing of mounted search and rescue personnel and canine teams would be permitted.*"

Section 3.1 Socioeconomics
Add a section in the first paragraph: "*Los Alamos is home to several active volunteer search and rescue teams, who provide important emergency services throughout the state. Canine search teams, mounted search personnel, communications, high angle rescue and medical teams contribute significantly to the safety and welfare of state and local citizens. These groups require access to wilderness areas for training and testing purposes, and have made extensive use of LANL/DOE trails and undeveloped lands.*"

Section 4.0 Environmental Consequences
Table 3. Comparison of Alternatives on Affected Resources
Socioeconomics Row, Trails Closure Alternative
Add phrase "Would limit LANL trail use to workers at LANL, officially invited guests, and *other approved groups*"

Health and Safety Row, Proposed Action
Change to *"Negative effect on public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel"*

Health and Safety Row, Trails Closure Alternative
Change to *"Negative effect on public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel"*

4.1 Socioeconomics
4.1.1 Proposed Action
Add text to second paragraph: "*Loss of access to trails and undeveloped areas would have a significant negative impact on the ability of volunteer wilderness search and rescue personnel to adequately train and prepare for emergency activities in New Mexico.*"

4.1.2 Trails Closure Alternative
Add text to second paragraph of "*Loss of access to trails and undeveloped areas would have a significant negative impact on the ability of volunteer wilderness search and rescue personnel to adequately train and prepare for emergency activities in New Mexico.*"

4.7 Health and Safety
4.7.1 Proposed Action
Add text *"Trail and area closures resulting from the Proposed Action would negatively impact public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel."*

4.7.2 Trails Closure Alternative
Add text *"The Trails Closure alternative would have negative impacts on public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel, negatively impacting search and rescue mission outcomes."*

4.7.3 No Action Alternative
Add text *"Training and preparation of wilderness search and rescue personnel for participation in emergency activities benefiting New Mexico citizens would continue as it has in the past."*

6.0 Cumulative Effects
Socioeconomics: "The Proposed Action would seek to strike a balance between the desire to use LANL trails for recreation *and appropriate volunteer activities*, the need for LANL to foster environmental stewardship…"

We believe that our comments are appropriate and practicable to be considered in the final EA. Thank you for your consideration of these issues and comments.

Sincerely,

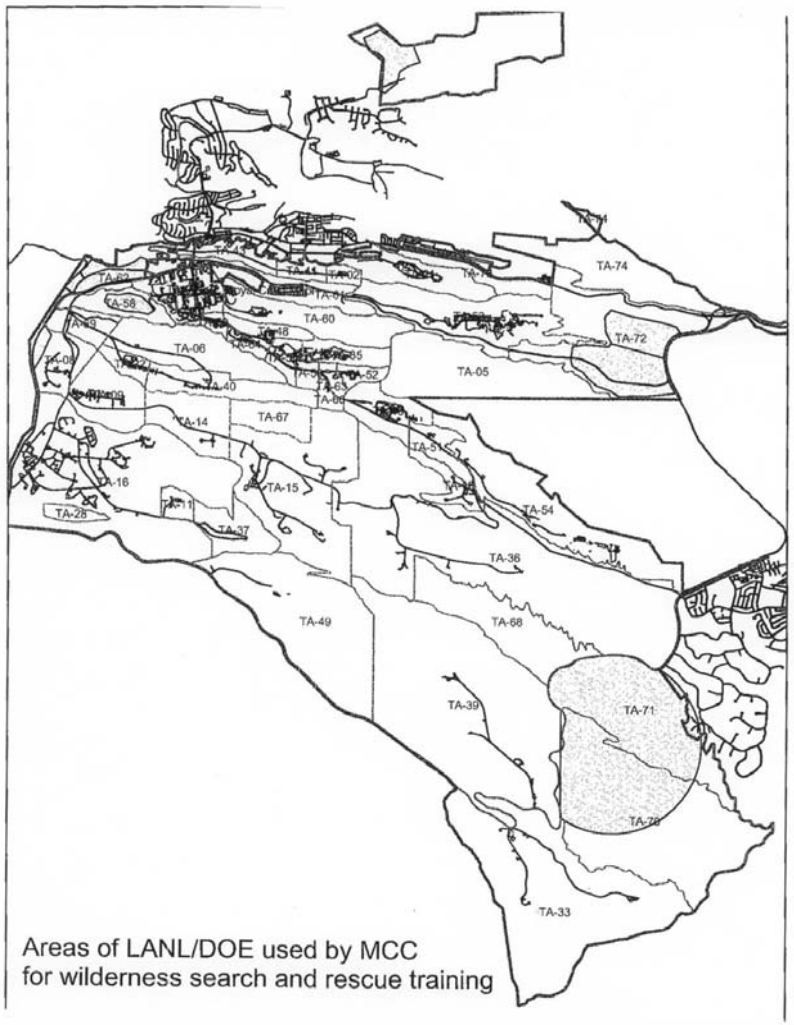
Cyndi Wells

Cyndi Wells, on behalf of the members of MCC
President
Mountain Canine Corps

Also, signed:

Sue Barns
Training Director
Mountain Canine Corps

Wendee Brunish
Vice President
Mountain Canine Corps



Areas of LANL/DOE used by MCC for wilderness search and rescue training

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

I feel there is a necessity, to distribute facts in a timely manner between agencies governing the land and the public which includes retired persons, non-LANL employees and users such as hikers, dog walkers, bikers, horseback riders, search + rescue training and rock climbers.

over

If you would like a response please provide your name and a mailing address:

Barbara Ramsay 6 Erie Lane Los Alamos NM 87544

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?

Barbara Ramsay [redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

I would favor a trails management program provided there isn't an exclusion of use to the listed area while a plan is being emplimented. This would limit the quality of life for some Wild Rock area residents. Having lived in Los Alamos for 50 years and having been instrumental in the procurement and development of Pajarito acres so as to provide an atmosphere in which to raise our children, while enjoying nature, and now retire with the freedom to hike and ride in the area has been rewarding. Because of this nurturing atmosphere our children have decided on careers linked to nature, a geologist, an entomologist and a veterinarian who founded the Wildlife Center to rehabilitate injured animals back to the wild. Our fourth child is a local contractor who decided to raise his family in this environment.

Please keep this land available to the residents.

Barbara Ramsay

P.S. The Pajarito Riding Club has cooperated with Bandelier Nat'l Monument to maintain trails and monitor their usage. This has included removal of several tons of trash from before the area was fenced and signed.

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
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Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Aug. 1, 2003

Horse patrols and other equestrian activities throughout Los Alamos County and Laboratory lands ought to be encouraged and not curtailed for the following reasons:

see overleaf

If you would like a response please provide your name and a mailing address:

Petr Jandacek [redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes, Please	No Thanks

If "Yes", where should it be sent?

[redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to:

#1. Before the laboratory was established there was a long tradition and culture of private enterprise ranching and the Ranch School. One could argue that horse patrols were a mandatory curriculum and vocation.
#2. Much of early Los Alamos Laboratory security was provided by mounted patrols. Thus, an equestrian tradition is in fact "grandfathered in" our lifestyle and represents reasonable expectations.
#3. White Rock and Los Alamos past and present equestrians have provided valuable services in recent decades when called upon to perform search and rescue operations for the lost, injured and dead. Cleanup, erosion control and safety mitigation were a routine activity when I served in the context of Fair and Rodeo Board, 4-H parent and officer of the Pajarito Riding Club. The prowess and success of the riders was the direct consequence of their intimate knowledge of the area.
#4. Concerns about security and / or vulnerability to wildfires or other ecological disasters could be (to a measure) put to rest if riders were encouraged to report or perhaps even remediate when appropriate. This could be perceived as an extension of the "Neigh-bor Hood" Watch.
#5. The Human Resources augmented by the Equine are not being utilized efficiently by Los Alamos. They should be sponsored and commissioned.
I write this with no personal advantage to gain but motivated by altruism. It is lonely in my saddle since my horse died several years ago....

Petr Jandacek (past president of Pajarito Riding Club, and past Member of the County Fair and Rodeo Board)
127 La Senda Rd. Los Alamos, New Mexico 87544
Tel: 672 9562 e-mail: jandacek@mesatop.com

Jandacek
Aug. 1. 2003

Dear Elizabeth,

Please consider the following:

In Executive Summary - pg #ix, paragraph #4, sentence #2
suggested text: The Trails Closure Alternative would have a negative effect on socioeconomics compared to the Proposed Action Alternative.

in 4.1.1 Socioeconomics - proposed action, pg#36, paragraph #2, sentence #3
Strike the word 'temporary' so that the sentence reads "Loss of trail access would reduce perceptions of quality of place ... "

4.1.2 pg#36
The Trails Closure Alternative would have a long-term effect on socioeconomic conditions.
(as justification for the wording suggested for 4.1.2, I site section 1.4 of the EA that states that "reasonable maximum assumptions be used." please consider using such reasonable maximum assumptions in assessing the socioeconomic effects.)

Thank you for the opportunity to comment. I enjoyed our brief discussion at the meeting at Fuller Lodge. I would like a copy (or web access to the copy) of the final EA.

Regards,
William R. (Rob) Oakes

Comments to be considered in the EA:

As a long-time and frequent trail user in the Los Alamos area I am very concerned with potential closure and/or regulation of the trail system. I have enjoyed using the trails for various activities including running, cycling, hiking, and dog-walking. As these trails are extremely popular and extensively used by the community, I have yet to find myself alone on any of the trails surrounding the city of Los Alamos. The trails belong to the community and are enjoyed by all.

I have never seen signs of serious damage due to overuse, or abusive behavior by the trail users. In the nearly ten years I have been using the trails, I have not seen evidence of substantial deterioration due to overuse, rather I have witnessed ordinary wear-and-tear which essentially keeps the trails passable and prunes excessive overgrowth. Additionally, I am a member of an organization that works toward improving and revitalizing the trails in the Los Alamos area and keeps a watchful eye over erosion concerns. The community has taken the initiative to work towards preserving and improving their trails so that they may continue to enjoy their use.

Regarding security issues, I think it is silly to imagine the trail users, people who are accessing the trails in the interests of enjoying either nature or fitness or both, are covertly attempting to monitor or infiltrate the National Lab. Frankly, I doubt many of the trail users spare more than a singular glance at the Lab property. Prohibition of the use of the trails will only prevent honest citizens from enjoying them, those individuals who are interested in compromising Lab security will not be detained by trail closures.

I hope that the National Nuclear Security Administration (NNSA) will understand the value of Los Alamos's trail system to its community and with that in mind act wisely to promote responsible trail usage and aid its community organizations in continuing the positive work towards guarding against erosion and overuse. Furthermore, I hope the NNSA will realize that the trail users do not pose a threat the National Labs security. And through the imposition of trail closures will only be upsetting a community who supports the Lab and values the natural beauty of the forests surrounding it, something those who live in Los Alamos and those who choose to move to the area have come to enjoy.

Hi, a friend forwarded the "DOE/NNSA trail policy" information yesterday and cc'd me on his comments which is where I got your email address. I regularly use trails around the laboratory for walking and running. I wish I had known about the July 30th meeting earlier.

The first of the five goals would best be served by clearly marking trailheads with information. They could be similar to the information at wilderness trailheads.

1. Allowed modes of transportation - serves to inform about risks to cultural and natural resources including erosion and serves as fair warning to potential abusers.

2. The route of the trail, including distances to landmarks or intersections with other trails - see reasons given in 1. and improves safety, for example in cases where the person has to leave a canyon due to flood danger or simply has gotten disoriented.

3. What dangers are present (flood, lightning, contamination, etc) and what to do to minimize them. My health is much more at risk from my sedentary job than from anything I might encounter on the trails.

4. What at-risk plants, animals and cultural or geographic features are present.

Someone ordered to do something rebels, an informed user is much more likely be cooperative and sensitive to the environment.

Appropriate signage also addresses goal 4. If someone leaves lab property and enters restricted, marked pueblo property (whether closed or open only to pueblo citizens), they may be fined for trespass by pueblo authorities.

Goals 2 and 3 are simple to address - close or re-route trails near sensitive installations so their use does not affect mission work or security and put into place real consequences for ignoring permanent or temporary closures. This last also pertains to goal 5.
Sometimes, closures due to fire restrictions are ignored but we and other groups involved have no enforcement authority beyond notifying someone's supervisor. I know these closures are unpopular, I miss the trails when they are closed too, but making separate rules for different users is not possible.

Access to the trails greatly enhances the quality of life for residents, visitors and workers. The negative aspects of closing trails far outweighs the minimal benefits. With a little work and cooperation, I'm sure we can keep them open and meet LANL/DOE/NNSA mission goals. I, and I'm sure many others who enjoy use of the trails, would be happy to work voluntarily to maintain and support the trail systems in and around LANL.

Thanks, Dave Howard

Dear Ms. Withers:

I would like to ask you to reconsider the closing of the trail by your building that the "old timers" in Los Alamos call the $e=mc^2$ trail. This trail is part of the historic Pajarito trail. It was of interest to the Project Y group as the carving of the equation on a rock near the bottom of the canyon indicates. The area was used by the Girl Scouts. I first came to Los Alamo in 1954 and ever since I can remember this area has been open to the public.

This area was never used for Laboratory work and as far as I know contains no solid waste management units. The building you work in was a dormitory. There is no evidence of any Indian ruins.

With the decommissioning of TA 2 and 41 there appear to be no security concerns. The area is separated from your building by a significant space. The recent Laboratory health letter recommends that Laboratory employees exercise each day. This health letter includes walking/hiking as one of the recommended activities. This trail is one of the few in the downtown-hospital area and provided a lovely relaxing walk. It was not burned in the recent fire. I would also like to see Los Alamos canyon open for walking. Again with the decommissioning of TA 2 and 41 there should be little in the way of security concerns for walking in the canyon. I use to work at TA 2 and I have always loved this canyon.

If the NNSA has concerns over lawsuits from people falling etc. I suggest a sign that notes that the trails are to be used at the person's own risk. This approach would solve this problem.

Sincerely yours,

Betty Perkins

Longtime Los Alamos Laboratory employee Betty Perkins.

Hi Elizabeth, I heard that you were still taking comments re: thePreDecision Draft of the Proposed Trail Management Program at the Lab.

I would like to make one suggestion, and that regards the establishment of the "Trails Assessment Working Group". One group that I think should be represented on this working group is of course, the users of the trails; specifically Laboratory employees that use the trails to either get to and from work, between Lab sites, or most importantly, for recreational purposes at lunch time to maintain sanity and some semblance of physical fitness. This is a large group of users, and if trails assessments are to be made, who better to help provide input than the actual users? I would suggest trying to get a cross section of employee joggers, walkers, and mtn bikers. Also, it is not necessarily explicit in your list of potential contributors to the committee that there are trails maintenance and building experts to be involved.

If you desire, I could supply some potential (laboratory) people that could serve the role as user and trail maintenance experts -- surprisingly, there are many! from all of the trails rebuilding we have done on FS lands post-Cerro Grande.

Thanks for your consideration,

Kevin

Kevin C. Ott

United States Department of the Interior
NATIONAL PARK SERVICE
BANDELIER NATIONAL MONUMENT
HCR 1, Box 1, Suite 15
Los Alamos, New Mexico 87544

In reply refer to:
L7619(BAND)

August 5, 2003

Ms. Elizabeth R. Withers, NEPA Compliance Officer
United States Department of Energy
National Nuclear Security Administration
528 35th Street, MS-A316
Los Alamos, New Mexico 87544

Dear Ms. Withers:

Thank you for the opportunity to review the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory (LANL) Trails Management Program. We support your proposed action of implementing a Trails Management Program at LANL. We do not have any other comments on this programmatic environmental assessment at this time.

Should your final decision incorporate elements of the proposed action, we look forward to participating in site specific planning and coordination of trails management across the Parajito Plateau, particularly for those areas where we share boundaries and recreational opportunities.

Sincerely,

Gail C Menard

Gail Menard
Acting Superintendent

Dear Ms. Withers,

I have been told that you are working on the assessment and management plan for trails on LANL Property. I would like to make a special appeal that the current trails be kept open and available for hiking, jogging and mountain biking if at all possible. I and many of my co-workers have used and enjoyed these trails for many years (< 30 years) in my case, and they are a vital part of our lunch hour and weekend fitness activities. I have held many challenging technical and management positions at LANL during my career, but have nearly always been able to find a bit of time for biking or jogging because these trails are so close at hand.

I appreciate the difficulties in managing such a trail system, but strongly believe that the benefits to LANL, in terms of a healthy, energetic and happy workforce, more than justify the effort and expense. I expect that an increased threat to perimeter security is one of the concerns driving the possible closing of some of the trails. However, you should consider that concerned LANL workers using the trails actually constitute an informal patrol system that probably enhances security rather than reduces it.

I truly hope that you will try to keep as many of these trails open for recreational use as possible. It becomes even more important to preserve them now that the Forest Service is planning to trade away (to the pueblos) many of the other prime areas for outdoor recreation that Los Alamos County residents and Lab workers have enjoyed.

Thank you for your consideration.

John Hopson

Dear Ms Withers,

Thank you for arranging the public meeting on the Trails Management Program last night and for having so many experts there to talk to the attendees. A much clearer picture of the Program has emerged.

I think the Trails Management Program is a good idea as many of the markings on the trails are confusing and it is not clear which trails are open and which are closed due to the age of some of the signs (p.6).

I wish you all the best in the development of this Program.

I have a few comments:

p.8 *Pertinent Trail Issues*
Trail use poses threats to some cultural and natural resources.

The recent chopping of tress Potrillo Canyon in order to make a fire break for WR appears, to the non-specialist, to have inflicted ecological damage. There has also been a large shallow pit dug for some purpose that has not been made public. Whatever pit's value it has not been touched for some months. (also p.17 and p.26)

The plateau has many cultural resources. The best have already been protected either with grilles (Painted Cave) or with fences. (also p.17 and p.27)

The human access to Potrillo Canyon means that the large animals inhabiting the plateau treat the area with caution. This is good as it acts as a buffer between the wild and people, thereby protecting both the human and animal population. (also p.17)

p.19 *"Overnight Use....."*

This is not a major issue now.

p.30 *3.8 Environmental Justice and page 36 4.1 Socioeconomics*
The fact that the low-income population of Northern NM is not a higher percentage of the population is a direct result of LANL. "Trickle down" economics influences the whole area on NNM. People with higher education migrate to Los Alamos to serve the US in a locale that is pleasing to them but, in so doing, many sacrifice close-family ties. The closure of some of the Canyons would adversely affect the life-style of the privileged few but will also affect the life style of the broader society.

Further, the trail system is an attraction that brings tourists to Los Alamos and so boosts the economy of the town in a way not directly connected with LANL.

General Comments

1. In the future there is the possibility of expanding the university system in Los Alamos. Specialty course might be taught such as arid-land farming, and, in this context, more importantly, geology. The geology of the area is a mecca for some geologists and LANL could help in the long term planning of an expanded university system, thereby helping the economy of the town.

2. Perhaps it would be possible to include in the Program representatives from some groups, such as the Pajarito Home Owners Association, La Senda Homeowners Association, Pajarito Riding Club, Dog Search and Rescue Club, and UNM-LA?

Respectfully submitted,

Caroline Mason

Thank you for giving the public an opportunity to weigh in on an issue that is of utmost importance to Los Alamos community.

Many people have worked very hard, for over 10 years, to preserve and enhance a trail system that is based on the historic roads and trails of the Pajarito Plateau. These trails are used for recreation as well as for commuting. Because many of the trails were developed long before the Manhattan Project came to Los Alamos, many of the trails in the County system have natural extensions onto current DOE property.

The following trails are the ones I believe are most important to keep open to public access. They are historic and contribute to a sense of place. And they create connections that allow for a varied and extensive system of trails when combined with the Los Alamos County Trail System:
Most of these are in the Los Alamos Canyon area.
Devaney-Longmire
Deadman
Duran Road
Gasline between the top of the Duran Road and Los Alamos Canyon bridge
Mattie Brook
Los Alamos North Bench
Los Alamos Canyon
Camp Hamilton
Breakneck
Bayo Canyon Trail

Janie O'Rourke

I would like to encourage LANL to please not close down our trails or climbing areas located on lab property. I know you have a security issue to deal with, but let's not get paranoid. These trails and climbing areas are used by many employees and members of our community. Our many outdoor activities in this lovely setting are one of the few perks to living in Los Alamos. We can take care of these places and help you police them as well. Just give us that responsibility.

Thank you!
Irene L. Powell

Much of the laboratory land is used by hikers, climbers, and bikers for recreational use. These may be either laboratory workers or visitors. Since we are encouraged to exercise for both our physical and mental health, reduction in the availability of the trails on laboratory land would highly impact our ability to enjoy a walk, run or ride at lunch, or after work hours. I think this use should be an important point to consider in any assessment of the use of laboratory property. Continued input by various users groups should also be considered. Many people move here because of the easy access to the outdoors. Loss of this use would be one more negative at a time when we don't need more negatives.

If you would like a response please provide your name and a mailing address:

Kathy Lao

Dear Ms. Withers:

I believe that the document DOE/EA-1431, Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, has two major flaws. I think that it does not fully address the importance of recreation on the DOE lands, and it does not make a convincing case for the proposed action of a Trails Management Plan. The Proposed Action does not include sufficient public input.

Recreational use of the DOE lands around White Rock (TA-70 and TA-71) is extremely heavy. The areas are close enough that many of us can simply walk out our doors and be in the canyons in minutes. This ability is extremely important. Because the land north of White Rock is not public, the land to the west is not open for public use, and the land to the east (White Rock Canyon) is too rough for us as we age and is unsuitable for bicycles and horses, there is no other place where we can go for an hour or so without driving for at least half an hour each way. We would also have to trailer horses to get to other areas. I have been walking in the DOE areas most days of the week for the past 17 years, and it is really awful when they are closed. There is simply no other comparable place to go. During the winter, the hiking is limited. Bandelier does not allow dogs or bicycles. The Santa Fe Forest north of Guaje Canyon is closed indefinitely. There isn't much other public land at these elevations that is close to town.

Table 3 in the document which categorizes the impacts does not show significant impacts, except perhaps to cultural resources, for any of the alternatives - the Proposed Action, Complete Closure, or No Action. Therefore, it does not support choosing the Proposed Action over No Action. I believe that the Proposed Action would result in major impacts on the quality of life of many residents. (The Complete Closure decision would affect the quality of life much more.) The document does bring up legitimate concerns which I think can be addressed in ways that would impact the quality of life less than the Trails Management Plan would.

I propose the following actions, which address the stated goals of the Proposed Action.

1. Protect sensitive cultural and environmental resources by marking them, fencing them, and/or re-routing trails to avoid them. I assume that these areas are relatively small - like a ruin or a cliff side. Some closures would be seasonal.
2. Protect human safety by marking or fencing those areas which pose dangers due to LANL Operational hazards. It is not the DOE's place to protect the public from dangers that could normally be expected in a remote, undeveloped area.
3. Close areas as required for operational security.
4. Post and fence the boundaries with San Ildefonso lands. These lands should be respected as any private holding.
5. Put up consistent signs so that closed areas are obvious.
6. Educate the public about the importance of respecting the boundaries and closed areas, and about not creating new social trails.

Below are some specific comments about the Proposed Action, should that action be chosen.

An additional goal of the Management Plan should be to provide non-motorized, primitive daytime recreation. Recreation is not in the DOE charter, but maintaining a work force is important, and this issue directly impacts the people who live and work here.

Access to DOE land should not be based on race.

Minor trails and routes are vitally important to recreational users. Because of the kind of use that I, and others, make of these areas, trails are not used primarily to get from one place to another. I use them to get a bit of exercise and to enjoy nature with my dogs. Therefore I want to be able to have a variety of experiences. A trail on the south side of a canyon is vastly different from one on the north side; they are not redundant, nor is that duplication particularly harmful to the environment.

Before an area is closed to certain uses (horses, dogs, bikes, or all use), obtain site specific data that supports the decision, publicize the data, and invite and listen to public comment.

Create some mechanism for the public to have input to the Trails Assessment Working Group, and a process for appeal of its decisions.

Section 4.1.1 addresses the possible shift of use to other land, as trails are closed. There is no nearby comparable land for winter recreation, and the nearest comparable land for three season use is at least a half hour drive from White Rock, so I think that the use will not shift. We will simply be unable to enjoy the recreational opportunities that we now have.

Sincerely,
Lauren McGavran

As an employee of LANL, and a 30+ year resident of the Los Alamos area, I can tell you that the trails located on LANL property are used and enjoyed by many LANL employees. The opportunity to exercise on the trails at lunch or after work is a great asset to the LANL workforce, and helps improve the physical and mental health of many employees. This asset should not be taken from the employees without serious considerations regarding the impact on employee morale, especially at a time when morale is somewhat low to begin with. In the past 30 years, I am not aware of any fires caused on LANL property by employees who are hiking or bicycling (of course, I do not know everything). I hope a plan is developed which will be healthy for the land as well as the employees.

If you would like a response please provide your name and a mailing address:

Byron Morton

As a general member of the local community and a member of the Tuff Riders Mtn Bike Club I am apprehensive about the proposals to close lab. trails for general use. I am unable access the proposal from my compute, did not learn about the public comment meeting until 2 days prior to that meeting and had other committments for the evening. I'm appalled at how little communication the lab has with it's neighbors.

I do not think that there has to be a blanket closure of all trails for recreational use. The seems like a knee jerk reaction to imagined threats.

Security is necessary but this goes beyond the boundrys of sensible decision making. It is similar to the extreme proposal by Kirkland to close Otero Canyon to general use. Both areas have traditionally been available to the community and i believe should remain so.

We who use the need to respect the impact our use creates and behave in a manner that minimizes the damage. There is no reason we cannont do trail work to maintain them in a healthy manner. We must assume the risks we take when we use them and be accountable for our safety as in any wild area. Closure for fire, flood or falling tree safety is reasonable as is registration by the groups who use them. I am not adverse to putting my name on a list in order to use these trail.

If they are closed then this whole town will be relegated to essentially 2 local trails, Bridges and Perimeter. If 10% of this community uses those trails the damage and tension amongst users will climb dramatically.

I hope the Lab takes a larger view of local needs for outdoor recreation, alternatives to help provide lab security and not make a knee jerk decision.

Chris Nelson

The Laboratory recruits from the nation and the world, and needs to attract people who have a choice of where to live. Persons who come to the Laboratory give up many amenities of urban life – the nearest university is 100 miles away, and a wide selection of shopping, the arts, and restaurants requires an hour's drive. In return, the Lab can offer a uniquely beautiful natural environment, available close at hand for hiking, running, and biking. The trail system through DOE land offers access to this world. Other options to access this environment have been narrowing as the years go on. Indian lands are increasingly inaccessible, and the Forest Service lands are heavily damaged by the fire, and will be years in recovering. The trails on DOE land are therefore important for recruiting – they make the beautiful environment something more than a view through a car window. The trails are also important for those of us who are already there, by providing a boost to our morale, and providing opportunities for exercise – also important for keeping in shape to perform our jobs.

There is also a safety issue involved in closing the trails. Many folks run and bike before and after work, or at lunch. If the trails are closed – for example, as they are right now – these activities will be moved from the trails to the roads. This will inevitably lead to vehicle-pedestrian and vehicle-bicycle accidents, accidents that need not happen if the runners have access to paths away from the roads.

If you would like a response please provide your name and a mailing address:

William Priedhorsky

In response to closing the trails due to "socioeconomic" factors, I would like to respond. This is nothing more than a smoke screen for idigenous groups to grab more land and put the squeeze on what little land, water, and resources that non-indigenous groups have (a.k.a. people whose ancestors immigrated to the United States of America). I and many like me are deeply resentful. We are natives of this land too and have just as much right to hike, walk, enjoy the public lands as the pueblo groups. It should be free for all to enjoy. Laws are already in force to prevent people from destroying archaeological sites, and if the trails do not cross Indian-owned land then there should be no argument about whether free access is available or not.

Some may raise the argument that these are "ancestral" lands of the Indians. That argument doesn't hold water. Their ancestors abandoned the lands centuries ago. It is also the ancestral land of our people - numerous generations of Europeans, Asians, and other groups have lived here as well. The fact that my ancestors owned property in Ireland, Switzerland, Austria, etc. doesn't give me a free ticket to own land in Ireland, Switzerland, or Austria merely by asserting my ancestry in the year 2003. The same argument applies to the Indian groups. I'm not advocating taking away the lands they have - just to leave land boundaries the way they are. If we can't access the public lands then maybe it is time that all of the Anglos pack their bags and leave for Europe and give all of our land, houses, and property to the Indians. But then - who would support their casinos, golf courses, and souvenir shops?

It's fine to be good neighbors to the pueblo groups. But being a good neighbor doesn't mean giving away our right to walk, hike, observe nature, and give every acre of land everywhere to appease them. It's high time for the pueblo groups to be good neighbors as well and mind their own business.

Sincerely,

Roger Prueitt

I use the Lab trail system almost daily. I consider the system one of the benefits of working here at LANL. I use it for exercise. Closing the system would require me to drive several miles to access similar trails. Having this
trail system available for running, walking and biking is of great value in my
work day.

Jim Rutledge

Dear Ms. Withers,

We are looking forward to the meeting tonight. Everyone is a little anxious

because we rely on the trails and consider them a neccessity to living here in deprivation. With out the trails, those of us with horses will have nowhere to ride, and will leave the area. We will be at the meeting and have input to make this work for everyone involved.

Thank you,

Nora Aubert

What about the benefits of trail use to the mental and physical well-being of the lab workers who use these trails? Many LANL workers work long, irregular hours and take an exercise break during the day to exercise, breathe the fresh air, think about the problems of the day or project, and reduce stress. What are the consequences of not having this resource available to LANL employees?

Donna Bailey

Dear Ms Elizabeth Withers,

One of the most appealing features of Los Alamos is the access to wonderful trails and outdoor activities. Since access to shopping, art galleries, movies, concerts, restaurants is very limited compared to the cities, this access has been a mainstay of our recreational lives.

I have always enjoyed walking with my family on the many trails around the Los Alamos Laboratory and DOE lands. When my son was a toddler our play group took 'hikes' to let our kids enjoy the outdoors. We've had picnics, walked dogs, ridden bikes, cross country skied and simply enjoyed a quiet moment to think on these lands.

Please don't take this away. It's truly one of the reasons we wanted to live here.

yours
melissa bartlett

Dear Elizabeth,
Below please find a letter from Chelo at the Chamber of Commerce (I would be happy to supply a hard copy if need be). I will have a Los Alamos Profile sent to you and Daniel from the Community Health Council. As Chair of the Community Health Council I urge you to review the profile as the lack of recreation was specifically referenced by the outside consultant. The profile was recently updated and accepted July 2, of 2003. If you have any questions please feel free to contact me.

Jennifer Bartram

In Support of LANL Re-considering Closing Hiking Trails

The Los Alamos Visitors Guide boasts to our visitors, "Outdoor opportunities abound in and around Los Alamos for the adventurous. Enjoy year-round hiking and mountain biking on the scenic and historic trails that surround the community."

Los Alamos attractions revolve around our natural settings. The more than 150 miles of trails throughout town are a part or our landscape and many locals as well as visitors realize what a gift we have in hiking opportunities. Some of us use our favorite trails daily and couldn't imagine finding an activity to replace walking, hiking or running on them. To some, our trails are like our backyards.

Dear Ms. Withers:

Thank you for the opportunity to comment on the "Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico" (DOE/EA-1431). First I would like to say I support the general concept of a trails program at LANL, and the fact that the Preferred Alternative appears to perpetuate the general endorsement and approval of use of many open areas at LANL for recreational use by LANL workers and the public. My subsequent comments mostly pertain to recommendations for improvement to this concept, and to otherwise improving this EA.

As a side note, I attended the meeting at Fuller Lodge this evening, and there was a clear feeling from the audience that the ESA was biased against trail users and that NNSA-LANL would use this process in no small part as a means to close trails that had previously been open. From reading the EA and knowing NNSA and LANL, it is easy to see how the public could get this impression. Therefore I recommend that in revising this EA that the authors go to extra lengths to stress the positive and the intent to largely keep existing trails open, and hopefully open new ones.

One subtle but perhaps important distinction is the name. "Trails Management Program" gives one the first impression of restrictions. The alternative "Trails Program" instead gives a positive first impression. NNSA and LANL should consider changing the name to stress the positive.

There are several references in the EA to how having parts of LANL open for recreational purposes contributes to the quality of life in the area and to how trail use is a generally minimal risk activity with minimal negative side effects. I believe this is partly why the current non-codified policy has evolved, which I do not view as a major failing of DOE-NNSA or LANL, although having a more formal, codified policy is definitely in keeping with the times. I recommend building on these aspects in establishing a more formal, written policy. Aspects of this policy should include:

"NNSA and LANL recognize that having open areas for dispersed recreation contributes to the quality of life for local residents, workers, and visitors to the area, and that such activities generally have minimal risk and minimal potential for environmental degradation. Therefore it is

the policy of NNSA and LANL that parts of LANL that do not need to remain closed for purposes of security, operations, public safety, or protection of ecologically or culturally sensitive features, shall remain open for trail use and other dispersed activities."

In part I see this as a component of a "good neighbor" policy, the implementation of which, as a side benefit, NNSA and LANL could use for positive public relations purposes. It is a fact that, being basically a one-company town, Los Alamos and LANL are in many ways co-dependant. As such, NNSA and LANL benefit from having a higher quality of life in Los Alamos, and it is in their best interest to enhance that quality of life when they can. Having open trails is one such aspect that is important to many people in the area.

Related, there have been recent significant negative impacts to such recreational opportunities in the vicinity of Los Alamos, and more seem to be on the way. Specifically, the recent transfer of the TA-74 North parcel to San Ildefonso Pueblo has resulted in closure of a large tract of land, in walking distance from residences, that had been used by locals for decades. More local transfers to San Ildefonso, from the Forest Service, are planned. This EA would be strengthened by mentioning these recent and upcoming losses of recreational opportunities adjacent to Los Alamos as one reason that it is important for the local quality of life to maintain access to open areas at LANL.

From a health and safety aspect, this EA focuses on potential negative aspects from trail use and maintenance (correctly stated to be minor). I recommend adding the positive aspects to physical and mental health to be gained from outdoor activities, and stressing that this is one reason NNSA and LANL support keeping trails open--contributing to the physical and mental health of residents, workers, and visitors.

Similarly, from a cultural and ecological aspect, this EA focuses on the potential negative aspects of trail use. However, trail use, perhaps aided by some well-placed interpretive signs, can also be an effective way to enhance cultural and ecological awareness. One stated goal of NNSA and LANL is to be good environmental stewards. The best way to attain this is to be populated by environmentally aware and environmentally sensitive people. This EA should be modified to bring out these positive aspects of trail use and to help guide a trails program.

Another thing that is missing from this draft EA is a specific discussion of historic trails, such as homestead-era trails. It should be part of a trails program, and so stated in this EA, that historically important trails will be identified and protected. These trails should also be signed and opened to public use where possible, in part to maintain the cultural tradition of using these routes and in part to help educate trail users to local history.

Concerning the proposed "Trails Assessment Working Group", it is not clear that it would include trail users, both workers and residents. This would be a major oversight. The proposed surveys of trail users mentioned on p. 14 would be useful, but the most effective trails program should include trail users at all stages, so that the working group best understands the perspectives of trail users and so that such users best appreciate the institutional constraints that are present. The Proposed Alternative should be modified to add specific mention of trail users being part of the working group and the underlying rationale.

Also, the draft EA implies that all trail work would be done by LANL workers or sub-contractors. There are active volunteer groups in Los Alamos that build trails, among other things, and I recommend that this possibility be included in the EA. This could both help work get done for much lower costs, and help spread a sense of personal responsibility for trails at LANL.

There are several aspects of trails and trail use, discussed in this draft EA, that should be modified to improve accuracy.

In many places the draft EA refers to erosion along unmaintained trails as a negative impact, in part linking erosion of trails to water quality and the potential need for watershed assessment and monitoring. Compared to other areas of erosion and sources of sediment at LANL, trails are undoubtedly negligible in importance. Dirt roads are a major source of erosion and sediment, and if you calculated the acreage disturbed by dirt roads at LANL and contributing sediment, I have no doubt it would dwarf the acreage and potential impact of trails. In the course of doing field work at LANL (I am a geologist involved in the Environmental Restoration Project and the Seismic Hazards Program), I have seen numerous examples of active gullies caused and enlarged by runoff from roads and parking lots, also sediment sources that dwarf any trails impact. Finally, undisturbed areas on mesas and canyon walls are commonly eroding and contributing sediment to streams, making potential erosion on trails trivial by comparison. I therefore recommend that the EA be revised to better highlight the probable minimal contribution of trails to overall erosion at LANL, and to downplay this potential negative impact.

In various places the EA also mentions PRSs, the potential for public exposure to low levels of contaminants, and potential contaminant transport. The important part is mentioned on p. 40: that PRSs with potential health concerns are (or should be) fenced, closed off, or otherwise identified. This should be stressed more. Note that human health risk assessments incorporating conservative recreational land use scenarios are routinely done by the ER Project, and rarely show potential unacceptable consequences. For consistency, if such is the result of risk assessments, the presence of a PRS should be somewhat irrelevant for assessing trail use. Note that much land containing widespread low levels of contaminants has been or is soon planned for transfer to Los Alamos County for unrestricted use (i.e., Acid Canyon, Pueblo Canyon). I recommend that NNSA and LANL avoid the contradiction of prohibiting trail use due to contamination at lower levels than what is present on lands they have released from all institutional control. That would also indicate they do not have faith in their own risk assessments, which, needless to say, could leave a poor impression with the public.

I'd like to close with three places where trails and related land management could be improved from current conditions, hopefully as part of the proposed action.

The first concerns the issue of trespass onto San Ildefonso Pueblo land. In the course of hiking and doing field work over the Pajarito Plateau, I have commonly noticed an absence of signs along the San Ildefonso property line, and often the fence is in a poor state of repair (including adjacent to LANL, Los Alamos County, and Forest Service land). The simple act of improving

the fence and improving signage should be tried as a first step to reduce trespassing, without the need to close trails.

The second concerns the topic of closing areas in times of extreme fire danger, such as now. Based on my understanding of fuel loads, fire danger was always relatively low in low elevation piñon-juniper woodlands, compared to the ponderosa pine belt. And this danger should have been reduced greatly by the extensive tree thinning work over the last year. Yet areas of P-J (e.g., south of White Rock) are routinely closed anyway. I completely support prohibiting smoking and other open fires on these lands, but recommend that fire closures be more site specific and consider local vegetation, including the effects of thinning.

The third concerns the "periodic closure" of trails because of "the enhanced post-fire threat of flash flooding", mentioned on p. 8. The only example I can think of is the dirt road up Los Alamos Canyon from NM 4, closed after the fire because of flooding concerns but never opened back up (not even outside the monsoon season). Multiple strong lines of evidence indicate that we can relax, that the flash flood threat has dropped enough that such restrictions shouldn't be needed any more. Here I refer first to work done by the US Geological Survey after the 1977 La Mesa Fire and the 1996 Dome Fire, showing that after two years flood peaks had dropped dramatically. Second, there is an extensive study (also by the USGS) in Rendija Canyon after the Cerro Grande Fire that also shows an ~10 fold decrease in flood discharge for a given rain event in 2002 as compared to 2000 and 2001, completely consistent with the earlier work. Combined with the fact that the Los Alamos Reservoir has been maintained to dampen floods, I see no compelling reason to keep the dirt road up Los Alamos Canyon closed for flood hazards, and recommend that it be re-opened for public use.

Thank you again for the opportunity to provide comments on this draft EA.

Sincerely yours,

Steven Reneau

Dear Ms. Withers,

Since 1956 I have been hiking on the trails around Los Alamos. Some of my favorite ones start on LANL property (Pajarito Canyon Trail, Valle Canyon trail, Water Canyon trail, the Guaje Mountain Loop trail, and the trails near Pajarito Acres) and many of them reach Forest Service land after only a 100-foot walk across LANL property.

I also belong to Mountain Canine Corps, which is a local volunteer group that trains search dogs for rescuing lost people. We train our dogs twice weekly or oftener, using all of these areas and more.

I feel very strongly that the DOE and LANL should find a way to keep these trails open for public recreation. Our recreation space has already become very limited, particularly since we are cautioned not to hike in burned areas, or in canyons that could flood after rains. We are also now unable to walk all the way down Bayo Canyon, or in some parts of Pueblo Canyon -- areas that used to be open to public use. I also understand that lower Rendija Canyon is to be given to the Indian Pueblos, and will be totally closed to non-Indians.

Trail maintenance should not be a problem, as people who use these trails expect, and in most cases desire, trails that give a "wilderness" experience.

If keeping the trails free from trash is your object, I, and many others, would be willing to devote time to keeping them clean.

Please do everything you can to keep our trails open, particularly those that give access to public lands.

Thank you for your consideration.

Sincerely,

Joan L. Rogers

I would like to comment on the "Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program". Nowhere in the document is there any consideration given to the benefits to Laboratory workers provided by the recreational use of these trails on Laboratory/DOE property. Every day, one can see hundreds of Lab workers outside during lunchtime walking, running, and cycling on these trails, which all involved - the employees, the Laboratory, and the DOE. On the one hand, the Laboratory tries to promote the physical and mental well-being of its employees, and then it acts as if it has no interest in such matters by proposing to shut down the trails that are so beneficially used by its employees. The users of these trails stay on the trails; therefore, they have little or no impact on nearby sensitive natural or cultural resources. I urge you to keep these trails open to employee use and, where permitted, to general public use.

Mario Schillaci

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting

Wednesday July 30th, 2003

6pm—8 pm

Fuller Lodge

Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

The trails are one of our greatest assets. They should be cared for in a responsible manner. To close them would be a detriment to the community. If the effect upon the community is not considered, then those who decide to close the trails are either irresponsible, careless or incompetent.

If you would like a response please provide your name and a mailing address:

Noor Khalsa

My name is David Thompson. My wife and I moved to the Los Alamos area due to its geographical/geological beauty. I worked at LANL for a few years. Though I changed jobs to work in Santa Fe, we continued living in White Rock to maintain proximity to the beauty of the Jemez and Rio Grande Canyon.

We have wrestled with conflicting desires since arriving in White Rock. We are stunned by the beauty of the area, and oppressed by the lack of access to most of the landscape. I have been approached to return to LANL. We have been considering the trades regarding staying in this, low access, beautiful area and moving to a place without this conflict. We have decided to leave the area.

Recent events (9/11 etc) appear to be leveraged as excuses to remove access to the nourishing landscapes associated with (or in proximity to) government facilities. Locally we have had the Kirkland AFB attempting to close of a trail that has been enjoyed for many years, and now it appears that the pressure is to further limit access in this already "too tight shoe" around LANL.

LANL has had difficulty getting new folks to come to this remote location. Why have many of us traded conveniences to be here? I believe this is a rhetorical question. I also believe that LANL will further increase its barriers to gaining new young minds if it decreases the access to what the area has to offer. I know that the heretofore barriers have strongly contributed to our personal decision to move.

It would be in the national interest to free up access to some of this nourishing land, instead of adding further limitations.

Respectfully,

David R. Thompson Ph.D.

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm – 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary. I um a 15 year old girl and a small business owner in Nothern New Mexico. I teach children how to ride horses and one of the highlights of our riding is a trail ride. If these trails are closed than I will have no place to take them riding and I will loose business. Also please take into consideration the care of my horse. If I have no place to ride (on back)

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes X	No Thanks

If "Yes", where should it be sent?
Deborah Francisco
[redacted]

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

except the Arena He will be bored and Frankly I think it will be inhumane to not be able to take him out riding. Furthermore I do not own a horse trailer and I will not be able to trailer my horse to other trails very easily. And it is too expensive for me as a highschool student to buy a trailer and pay for gas to transport my horse other places. I think its pothetic how you are going to close a trail due to ~~a~~ enverionmental issues. don't you think that me driving my horse other places rather than just riding him on the D.O.E trails will add to the waste of gas and pollution. You guys are being inconsiderate of the community of Los Alamos, especially me as a small business owner. I have worked hard each summer to draft a small business plan and submit it the the Small business summer please don't take my business, and the sheer joy of enjoying the enviornment, away.

Sincerely,
Deborah Francisco
age 15 owner of Eagle wings horseback riding school

Ms. Withers,

I would like to recommend an extension to the comment period for the trails management program. I attended the meeting and thought that it was not well attended compared with the number of people who use the trail system around Los Alamos. So, I would also recommend at least one other meeting to include more stakeholders. Please understand that many people are on vacation this time of year and people at LANL are quite busy and may not have been able to attend the one meeting.

I would also like to state the vital importance of the trails and wild areas around Los Alamos. I have had two prospective employees decline employment at the lab with stated reasons that the cost of living is too high. I have known of other employees who moved away within the first couple of years because of similar reasons. I point out the negatives of the area during interviews to ensure employees move to the area with as much knowledge of the pros and cons as possible. And, one of the major positive points that I always point out is the trail system and the easy access to recreational opportunities. For hard-working people, this chance to easily unwind is extremely important for their long-term health and well being.

I encourage you to stress the importance of these opportunities if your trail management program is implemented. I also encourage participation of all types of stakeholders; especially horse-back riders to ensure that all uses are considered.

Sincerely,

Mel Burnett

EA Comments:

In 1980 my husband took a one-year position as a visiting scientist and we moved here as a family of four from Germany. We fell in love with Los Alamos and the seemingly endless open spaces surrounding it. We almost couldn't believe it, that we could walk out our back door and hike for hours.
Already that same year, when my husband was offered a permanent position at LANL, we bought our property in La Senda and hoped to be able to relocate as soon as possible. In 1982 we moved to Los Alamos permanently and built our dream house with a barn right on our property for our horses. We were thrilled to finally have access to endless acres of open spaces and became very active in many outdoor organizations. We eventually all became American citizens and 22 years later we still live in the same dream house, still have horses, still belong to the same riding club, ski patrol and search and rescue community. We have loved and treasured the opportunity to use the land around us and have done so with great respect. We have worked on trails maintenance, have searched for lost and injured hikers and have picked up trash others left behind. The fire of 2001 left a scar on us like on everyone else in this community. We lost so much, even though we were among the fortunate who did not loose their home. All around us we still see the burned forests and naked mountain ridges and hiking is still not quite the same. Just yesterday I returned with my clothes full of soot from a search and rescue practice. But we see the new aspens grow and rejoice over every colorful display of wildflowers.
The Pre-decisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program scares me. Just the thought that someone, who does not know all of us who love and use this land so much will be able to sit in an office somewhere and make a decision that will affect our everyday lives and joy, has given me sleepless nights. I know that you will be working diligently on putting together a group of experts, who will come to a joint decision about the land around us, But will WE be heard, we, the people who live surrounded by DOE land?
I urge you to include members from our community, who care about the land surrounding us into your working group and to find a plan that leaves the recreational areas surrounding us open to everyone who is willing to treat the land with the respect it deserves.

Thank you.
Lette Birn

I believe that closing the fitness trials would be a grave mistake for the laboratory. I as well as many other employees enjoy running, hiking and biking the trials during lunch as well as before and after work. Physical exercise is a good way to unwind from stress as well as organize and process the activities of the day. Closing the trials would not only take away employees opportunity to enjoy a few minutes in the out of doors, but I believe that is would also hurt the moral and productivity of the lab. I believe that the "safety issues" that arise from the use of the trials are far out weighted by the benefit of the trials to the employees physical as well as mental health.

Thank you
Anne Chamberlin

Elizabeth,
I have attached the comment form referencing Public (Employee) Input for the trail policy. The text of my comments are also replicated below. Please let me know if further input or a different format would be useful.

Thanks,
Dave Chamberlin

Comment on Trail Policy by a Laboratory Staff Member:

The trails on public lands around Los Alamos and the National Laboratory are important to the community and to the employees of the Laboratory. All the classic explanations of the benefits of wilderness, of the natural outdoors, of individual solitude and privacy, and of physical exercise are applicable to these trails. During breaks from the workday and in the off-hours, these trails provide a relief and a refreshment for the Laboratory employees. For many of us, the availability of the outdoors is a strong reason to begin and to continue employment at this Laboratory.
These trails should remain open and available for the employees and their families. In this isolated community and workplace, features like the trails and the outdoors, the hiking and the family picnics are vital to maintaining the workforce and its physical and mental well-being.

Dear Ms. Withers,

Thank you for meeting with the public last Wednesday regarding maintaining the LANL trails. It was very encouraging to us that we are included in this new "openness" policy, unlike approximately six months ago, when all of a sudden we found Potrillo Canyon chopped to pieces, riddled with ruts, and in our opinion damaged beyond belief.

It has been pointed out before, that the LANL trails, particularly those in Potrillo and Water Canyon, are heavily used by various recreational groups. For years, the Pajarito Riding Club and individuals in White Rock have maintained and improved these trails, warned an occasional tourist not to run over the cultural sites, and, in general, safeguarded and treasured these trails, because they are very special to us.
It is a refreshing thought that the lab is paying attention to its trails and is willing to maintain them.

However, I do have some concerns. Even though at the meeting on July 30 there was much information discussed and handed out, I am left with lots of uncertainties and worries, and I hope you will address these or at least take them into account.

You may close certain trails either temporarily or permanently.
This could mean you could close of one or both canyons, thereby denying access to the various groups of people who are now using them. This would be devastating to the Los Alamos community, especially those of us in White Rock who have no other area to ride their horses unless we trailer somewhere. (The nearest place would be North Mesa, which, since the Pajarito Road closure, is now 45 minutes one way - not easy to do when you are working, especially not in winter time. Besides, everything north and east of Rendija Canyon is now off limits.) The joggers and hikers will have a hard time, too, because jogging and hiking along side the highway is not without danger.

In your report on page 36 you did express some concern about the quality of life being affected by the trail closures. I believe this concern is underestimated. Los Alamos does not have much to offer besides recreational activities; the fire reduced hiking, riding and jogging opportunities in Los Alamos to a large extent and makes it less attractive to live here. In addition, the drought has reduced incentives to live here as well. The quality of life here will be even more reduced if the lab decides to close some of these trails, resulting in attracting fewer employees, fewer tourists and a reduction in property value. I believe these are serious impacts on our community.

An additional concern I have is that we, Los Alamos residents, are not invited to be part of the "trail team". Is it possible to have some representatives of the various "user" groups included? I am thinking of the Canine S&R group, the local hiking groups, the Pajarito Riding Club, the bike club, perhaps the Homeowners Associations.

Furthermore, I am worried that this initial "openness", which was so well displayed last Wednesday, may not last. Is there some assurance that we will be timely informed about the lab's actions on trail management?

The next issue I have is not part of the EA draft but does concern access to the trails, which are presently closed due to fire danger. Although I am fully aware of the drought and the dry conditions in the forests around us, why is it that only the lab (and not even Bandelier) closed its trails, especially after all the efforts expended on making these enormous firebreaks in Potrillo Canyon and along SR 4? Is the lab saying this huge expense was in vain? At Wednesday's meeting I heard you say that after sufficient rain fall (or cooler temperatures perhaps), the trails would be re-opened. Is that a guarantee? This is important to know since some WR residents are already discussing moving elsewhere if the trails stay closed even if the drought eases off.

One more, and this is the last one: we are not necessarily privy to your budgetary plans. But, since these are our tax dollars: how much has been projected this will cost annually, and who is paying for it? How many FTEs will be devoted to trail maintenance, and what will you do if you exhaust your resources before the 10-year plan is finished? Will you then close the trails due to lack of funds?

Thanks for willing to let us express our concerns.

Sincerely,

Corry Clinton

Elizabeth:
My voice in for the 'No action' plan. This action is something which is neither wanted nor helpful. It would make a lot of people unhappy for no good reason.

Jim Cobble,

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting

Wednesday July 30th, 2003

6pm—8 pm

Fuller Lodge

Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

If LANL/DOE/NNSA is looking to further decrease the moral of this Laboratory and the community that supports it, by all means shut down the trails on DOE land permanently. I understand that the DOE is not tasked with supporting recreation, but sixty years of history has preceded this EA that allows recreational usage on many DOE sites in the Los Alamos area. Please don't take these away. There are no other DOE facilities that have a land situations quite the same as LANL, so a comparison is hard to come by. I realize that a middle of the road option to create a trails committee to review the trails on a case-by-case basis might also be created. There was mention of allowing invited guests onto DOE trails and that these requests would need to go through the committee. I worry that this would be a bureaucratic board that would be slow to react and wouldn't help protect our environmental, historical, or our security assets anyway. I would be in support of no action.

If you would like a response please provide your name and a mailing address:

Mark Van Eeckhout

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.
These trails have been used for many years and I often hike some of the public trails on the DOE land. One of the reasons I live and work in LA and provide supporting services to many of the LANL employees is because of the quality of life and these trails are certainly a major part of that quality.

Bob Ellenberg

I would like to draw attention to the benefits of trail use to the mental and physical well being of the lab workers who use these trails. I also believe the trail use to be a big draw for hiring new staff.

Frame(

Kate Frame

I am writing to express my concern about the proposed closure of LANL/DOE lands to use by laboratory employees and the public.

Sitting in splendid isolation on a mesatop in Northern New Mexico, Los Alamos does not offer many of the amenities provided by other research and academic institutions: a range of cultural opportunities, restaurants, shopping (even for some basics), convenient access to major airports, etc. etc.... What makes up for all of the inconvenience is easy access and a tight connection to the natural environment.

In spite of the recent assaults on the landscape by fire and pestilence, the vast majority of people in Los Alamos still treasure their access to the mountains and the mesas and the canyons. By eliminating access to a big chunk of the land in the county you will eliminate one of the major features that brings people to Los Alamos, and that persuades them to stay.

John S. George, PhD

The trails on Los Alamos National Laboratory property should be valued for the benefits of trail use for the mental and physical well-being of lab workers and/or members of the public who use these trails. This priority should rank near the same level as the other priorities with regard to public safety, operational security, and the protection of sensitive natural and cultural resources.

If you would like a response please provide your name and a mailing address:

Jeffrey M. Hoffman

Please use other side if necessary. There seems to be an effort to ignore the people that live in the county and most often use the trails. This could have a drastically negative effect between the town and laboratory and Pueblo Indians. Many of us who live here do so because we enjoy the environment we live in.

If you would like a response please provide your name and a mailing address:

Don Gettemy

Please consider my comments. It seems the "No Action" alternative was ruled out when the decision to write an EA was made and I certainly hope that it is obvious that closing the trails would be a terrible decision. My main concern is the implementation of the management program. My comments argue against closing the trails and apply to the program implementation as well.

Recreational use of the LANL trails is a significant benefit to the physical and mental health of the users.

Trail closures will push users to the roadways which are considerably more dangerous than the existing trails.

The trails I access from TA-3 were all very stable and in very good condition prior to the fire when firebreaks were constructed and the tree thinning which followed.

I use the trails to get away from the roads and sidewalks. It is not at all desirable to have wide, well paved trails everywhere. The trails are attractive because they offer more of a challenge, more stimulation than the sidewalks, roads, or paved bike paths. Trail users must accept a certain amount of risk due to uneven surfaces and poor footing in places. Trail maintenance should be aimed at erosion control only.

I have not personally had any experiences which would indicate a need to restrict trails to specific groups (hikers, runners, horses, bikes, etc.) although motorized vehicles would be a danger to the rest.

I am concerned that when the time comes, trails will be closed for extended periods or permanently due to the lack of funds for maintenance. Every effort should be made to keep a trail open in the absence of a compelling reason to close it.

Please keep our trails open.

Thank you,
Duncan
Duncan L. Hammon

TO: Elizabeth Withers

SUBJECT: Environmental Assessment for a LANL Trails Management Program

Thank you for the opportunity to comment on the Predecisional Draft of the Environmental Assessment (EA) for a proposed Trails Management Program. I find this a rather strange document to have been issued. One would presume that the necessity for such a plan would be implicit, if not directly stated, under the National Environmental Research Park or National Environmental Policy Acts. It would seem that the effort would have been better spent on a trails program itself. Presuming some bureaucratic need for this EA, please note as a public comment that I feel a Trails Management Program is an essential component of any land management agency and long overdue at LANL.

Here are my comments on the EA itself.

TRAIL USERS: A program of this type typically focuses on the users, listing the benefits of the plan to users and at least implying intent to adapt the program to welcome more use of the resulting trail system. The usual benefits of more exercise for a sedentary population and an effort to encourage non- motorized transportation are standard rationales for a Trails Management Program. I find it incomprehensible that NNSA would even consider a Trails Closure Alternative! At LANL, trail use is a major component of employee stress management strategies.

I can find no reference in this document that user benefits will be an important factor in this proposed plan. Although the purpose of an environmental assessment should focus on the environmental concerns, the ultimate benefit (or detriment) is to trail users. The prevailing tone of this EA is that users are a nuisance that must be managed as an objective of the proposed program.

PUBLIC INVOLVEMENT: Intent for public involvement is mentioned throughout the document. I feel that the issue can not be stressed enough. I feel the recent thinning operation in Potrillo Canyon is an object lesson of the consequences of poor public involvement. The Pajarito Acres people were left frustrated by the inability to even locate a LANL contact and the grudging and unsatisfactory communication following contact. One presumes it could not have been pleasant for LANL managers and could have been easily handled with some minimal public outreach.

I could not attend the July 30 public meeting; instead, I attended a presentation by the Risk Reduction and Environmental Stewardship (RRES) Division on their proposed public involvement plan. The RRES plan appears to be a sincere effort to determine public perception and preferences concerning waste management and environmental remediation at LANL. The division leader attended the meeting. The RRES plan appears to have the potential to be effective; your proposed plan would do well to partner with the RRES plan in those areas having hazardous waste sites, as mentioned as a rationale for your Preferred Alternative.

I was a member of the ad hoc committee that drafted the original Trails Management Plan for Los Alamos County and subsequently served on the Trails and Pathways Subcommittee of the Parks and Recreation Board. We held several public meetings on the plan and on subsequent actions undertaken under auspices of the county plan. It was not enough, as judged by subsequent confrontations, threats, and vandalism. Your plan would be well advised to specifically specify for each trail action local informational meetings that included truly listening to the audience.

A colleague and I recently completed documenting homestead roads and trails in Los Alamos County, including some on DOE property not previously assessed by LANL's environmental group. We nominated ten trails for the State and National Registers of Historic Places, include two on DOE property scheduled for transfer. In the course of our interactions with LANL personnel, we felt that the lab does not have good documentation on historic roads and trails. I note in your social trails table on page 11 of the EA mention of Dead Man Crossing in Los Alamos Canyon, apparently disregarding the fact that the southern part of that route was access to the Duran Homestead, patented in 1904, that TA 3 now occupies. We feel that these old homestead roads are important features of the past that LANL should give priority to protecting. These old roads also make excellent trails and should be included in a trails management program.

I note that on pages 6 and 39, you mention "non-DOE issued guidebooks." As a presumed author of some of these documents, let me merely say that, after reasonable search, we couldn't find anyone to ask. Presumably, a Trails Management program would alleviate that problem.

During my 23 years of employment at LANL, I sincerely had come to believe that the reason many LANL employees remain at the lab through all the wrenching turmoil is that they love the environment here. The lab can inadvertently either capitalize or destroy that asset. At relatively little cost, LANL can enhance that amenity with a well crafted Trails Management Program.

Dorothy Hoard

Nowhere in the draft EA is the issue addressed as to the consequences to the physical and mental well being of the LAB workers to closure of trails. The benefits to the metal and physical health of the LAB workers far outweigh the other issues mentioned in the report. This is not a stated goal or objective of the study. This should be central to any decision. Many of the major stake holder groups, such as the Los Alamos Mountaineers and the Tuff riders were not asked to partake in this study. Employees at all levels and in all TA's should be asked to comment on such a far reaching decision that impacts their daily lives. The trails around the lab are one of the prime reasons people choose to work at Los Alamos. This EA needs to be revised to reflect the impacts to the existing trail users and the impacts on their lives if trails are shut down. There are many unanswered questions like: 1) How many daily users are there on each trail? 2) If they instead chose to walk and bike on the roads, what are the odds of them getting hit by a car (cyclists have been killed biking the roads within DOE property)? 3) What is the increased risk of heart and cancer desease from people not having a place to hike at noon? These are not trivial issues. They are very important to a large segment of the DOE workforce.

If you would like a response please provide your name and a mailing address:

Chris Horley

Please don't close LANL property to public access. The area in and around the lab is a HUGE asset to all of northern New Mexico. It's hard to find a safe a beautiful place to hike. PLEASE, PLEASE KEEP IT OPEN. Sincerely, Starr Johnson

Hi Elizabeth,

Alternative 1 is regressionary. While anti-terrorist sentiment is strong, it is in the end counterproductive to penalize workers and residents alike. Closing the trails will not provide any additional security from the determined, well-trained terrorist. Instead vigilance around sensitive buildings as is currently practiced is preferred. Hikers usually do not carry equipment, fire arms, etc. They just jog or walk and usually have females as part of the group. Thus, even cursory surviellance can sort out threatening groups from hikers and joggers (who wear almost nothing!).

Alternative 2 isn't as bad as it sounds. Trails can be repaired by volunteer work as is done in the county (funding is seldom given to do such maintenance). Here I sense a bureaucratic tendency to be able to say we actively are involved and in control. This has not been necessary for 60 years, and (see above) is thus demonstrably not needed now.

alternative 3 looks like a strawman, unfundable option designed to drive the resulting decisions back to Alternative 1. As such it unless there is really some source of funding, it is a rhetorical artifact and nat a true option.

To me Alternative 2 is the good enough. The other two alternatives are examples of the best being the enemy of the good. The underlying logic is that, if we can't do it perfectly with explicit funding and mandate, we should close everything. Let's get real here and realize that terrorist profiles seldom include walking up Los Alamos Canyon, or up the hill beside Rt. #502.

Finally, a comment on making the Lab safe from terrorism and in general concern for environmental damage. Clearly the only way to do that would be to close the mesa entirely as in the early years of the Lab. Since no one seriously is considering this, we need to search out ways to inhibit terrorist access that do not destroy a way of life that has been in place for half a century.

Thank you for this opportunity to comment.

Chick Keller (Lab employee for 33 years and member of Our Common Ground, retired).

Chick and Yvonne Keller

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting

Wednesday July 30th, 2003

6pm—8 pm

Fuller Lodge

Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

The importance of the LANL trails to the local community seems to be seriously underestimated in this report. These trails, many of which are remote from Laboratory operations, are extensively used for recreation by a wide spectrum of area residents, employees and non-employees alike. Some are also used for work site access, and should perhaps be counted as alternate transportation routes. While it is true the NNSA has no charge to provide public recreation, the NNSA must also recognize that as the largest landholder in the area, it must recognize that it's lands are *de facto* public lands, and manage the lands and trails that do not present security or actual safety risks (beyond those normally expected in wilderness or back country situations) accordingly. The conclusion of "slight negative socioeconomic impact" of trails closure seriously underestimates the use and importance of the local trails to the community. We are surrounded by lands that are "owned" by various governmental agencies, all of which have been closed to use by the general public. The LANL land, some of which is almost in individuals back yards, must remain open, where feasible, to use by the general public.

John Ullmann

National Nuclear Security Administration

Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

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Wednesday July 30th, 2003

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Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

No consideration of the safety and health effects of closing the trails appears to have been considered. For example, forcing runners and bicyclists onto the roadways increases the likelihood of serious or fatal accidents. Conversely, the runners or bikers are forced to drive to a locale where they are allowed in the back country. Hence, more cars on the road and greater probabilities for accidents. To my knowledge, no one has died from accidents in the back country, whereas at least a couple of cyclists and a handful of motorists have died on local roadways in the last ten years or so.

A similar consideration is the resultant discouragement of exercise and the consequent effects. Numerous people walk, run or bike from their workplace into the surrounding back country for exercise and/or stress relief. Clearly, lack of exercise and pent-up stress are major predicators of serious health issues such as hypertension, obesity, diabetes, heart disease, etc. Such health issues are extremely serious. About 2/3rds of American adults are overweight and some 400,000 Americans will die of heart disease this year. A critical element in getting people to exercise or simply take a walk is convenience. Currently, a large fraction of the workforce is immediately adjacent to areas where such possibilities are right outside their door. If, instead, they do not have enough time or are forced to drive to public lands to take a quiet walk or run (roadsides are not pleasant because of exhaust and noise), many people will be discouraged from pursuing the outlet they need. A thorough "epidemiological" survey would undoubtedly expose the negative implications of eliminating healthful opportunities.

Mahlon S. Wilson,

I have already submitted some comments directly to you on behalf of the membership of the search and rescue team Mountain Canine Corps. The following comments are my additional personal comments on the draft EA DOE/EA-1431.

First, I do not agree with the statements that either the Proposed Action or the Trails Closure Alternative would have a minimal effect on worker and public health. The Cerro Grande fire diminished recreational opportunities off DOE/LANL land. Closure of additional trails that results from either the Proposed Action or the Trails Closure Alternative further limits the public's ability to pursue healthy activities, such as hiking, running, rock climbing, and mountain biking. These activities provide both physical and mental health benefits and are activities encouraged by the Laboratory, especially in the face of rising health care issues. Also, given the high stress levels of most LANL workers and the lack of other recreational opportunities in Los Alamos, closure of any trails (from either alternative) will have health repercussions on the community. I have a strong objection to the closing of trails and areas that, being on Laboratory land, were being protected during the Cerro Grande fire at the expense of other areas.

Second, I do not agree with the statements made in the EA of a minimal socioeconomic impact. I am a younger staff member at the Laboratory and I would not have come here without the abundance of outdoor recreational opportunities. I feel that the work I accomplish here is not because of the Laboratory, but in spite of it. My hopes are the Laboratory will be able to reform and become a truly good place to work. But, at this point, if my recreational opportunities become more limited, I would have a hard time justifying staying at this Laboratory. I know I am not alone in these feelings.

I am also disappointed that funding is not addressed in this EA. While DOE/NNSA does not, as stated in the EA, have a "public recreational mission established by Congress", the Proposed Action will surely affect, through its workforce's reaction, LANL's ability to fulfill the missions mandated by Congress. I also believe that, without funding, forcing the Laboratory into a possibly expensive Trails Management Program with the option of trails closure is, in effect, a poorly veiled effort at closing the trails. Any trail closures would be a great disservice to this community.

Thank you for your consideration of these comments,
Cyndi Wells
Los Alamos resident and LANL employee

National Nuclear Security Administration
Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico
Public Meeting
Wednesday July 30th, 2003
6pm—8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

I run on the trails on Lab property several times a week. Closing them would have a large impact on my ability to get exercise and train for races. The impact of closing these trails on the general public far outweighs any advantage to the Lab that I can imagine. The trails are **not** unsafe. This is not the same as saying they are perfectly safe, but that is an unrealistic goal and one the Lab would be stupid to aspire to.

Blake P. Wood

Dear Ms. Withers,

Please open Potrillo Canton, Water Canyon and Ancho Canyon now. It has rained and all that spring chopping of trees was to reduce the fire danger. Our horses and dogs and people who live near the canyons and use them every day are not happy walking or riding our horses on the highway.

Judy Young, Secretary of Pajarito Riding Club

Elizabeth,

One of the big attractions to working at LANL is the tremendous outdoor recreational opportunities provided by the natural environment. Much of this area with easy access is on DOE land. I both climb and hike on land owned by DOE. While there are certainly other areas accessible to me for my activities during most times, it is difficult to imagine being able to take walks at lunch time without being allowed access to DOE lands. This is a big attraction to working here at LANL and being denied access would remove a major incentive for working at LANL.

Thanks for accepting input on this matter.

Mark Zander

National Nuclear Security Administration
Public Comments on the Predecisional Draft Environmental
Assessment for the Proposed Los Alamos National Laboratory
Trails Management Program, Los Alamos, New Mexico
Public Meeting
Wednesday July 30th, 2003
6pm—8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

I have read the Environmental Assessment [EA] for the Proposed LANL Trails Management Program. The EA addresses the common elements usually addressed in such reports, but does not address some important aspects related to the use of trails in and around LANL. The application of the EA process in this case is questionable, because the report does not address the impetus for considering a Trails Management Program at this time. The report makes the case that the environmental impact of any option is minimal. The real questions that should be asked and answered are not in the report. Based on this fact, the "No Action Alternative" option is the only reasonable decision.

The trails in and around LANL must be kept completely open and accessible. These trails are a major benefit of working at LANL and are used by hundreds of employees. Any student of business management or human behavior knows that providing a pleasant work place is one of the key factors in job satisfaction. The EA makes no effort to measure the impact of tail management or closure on the work environment at LANL. Closure or unneeded regulation of these trails will harm the morale of workers at LANL, make LANL an unpleasant place to work, and lead workers and the public to question the decision making ability of the NNSA and the Laboratory.

The intrusion of a "policy making" body, or a Trails Management Program on these trails is uncalled for – unwanted, unneeded and yields no added value to the environment of the laboratory. The need to make a "policy" about everything and "regulate" everything in and around LANL is not only a monumental waste of the taxpayer's dollars; it is ridiculous to any reasonable person. The Trails Management Program is a classic example of fixing something that is not broken – in fact, the trails are one of the few things that really work here – please, don't mess them up.

The Environmental Assessment on the trails did not make any sound arguments for closing or even regulating trail use. Everything is based on a perception that there "might" be some negative impact from people using the trails. I personally use the trails every day; I have never seen any unreasonable impact to the environment, or cultural elements on or near the trails. The issue of PRS problems makes no sense at all. Any real threat of exposure is controlled at a much higher level at the lab – we spend millions of dollars a year on hazard controls. The lack of a trails management program or a trails policy is not going to affect this at all.

The report consistently uses the term "Recreational use" or "social use" when talking about the trails. This term does not take into account the benefit NNSA and the LANL are gaining by having a pleasant working environment. Closing or regulating the use of the trails will lead to a stale, uninteresting laboratory campus environment that is contrary to fulfilling NNSA's and LANL's mission. Regulating, reducing or eliminating the use of trails on LANL property will reduce the quality-of-life at LANL, the NNSA and Los Alamos County in general. Is this reduction in quality-of-life in NNSA's best interest?

Government regulation of the forest caused the destructive Cerro Grande fire that ruined many of the trails surrounding LANL. Volunteers, including trail runners, mountain bikers, and hikers, have worked to restore these trails with no special "trails management programs." Many of these trails are now useable again and are being enjoyed by hundreds of responsible people.

Physical fitness is a key aspect of worker morale, reduced use of health insurance, and general job satisfaction. Reducing or eliminating the trails in and around LANL will reduce the physical fitness of employees and harm these beneficial effects. This measure is outside the purview of the EA, but is imperative to the decision-making process. The myopic view of the EA is not in keeping with responsible decision-making by the NNSA.

Finally, a common-sense issue: Will trail management or closure increase or decrease the quality of the physical environment around LANL? I propose that it will *decrease* this quality by *divesting* the workers at LANL and the people of Los Alamos County from interest in the areas now served by the trails. The EA does not address the effect of this divestiture. By placing the so-called management of these areas entirely on some special group, my personal interest in them will terminate. I am not interested in the management or the future of any area from which I am excluded. On the other hand, I take a great deal of interest in areas that I can use.

I cannot stress enough, my disappointment in the proposed management plan and the closure alternative contained in the EA. I sincerely wish we had leaders and bureaucrats that were more in-tune with what is going on at LANL and the surrounding community. Real people live and work here – we don't want our rights, benefits, or freedoms reduced – no one does.

I want to continue to use the existing trails as I have in the past. If I could vote for anything, it would be an *expansion* of the existing trail system on NNSA property. For the good of LANL and Los Alamos County, keep the LANL trails open and free of "Trails Management Programs" that create another layer of useless bureaucracy.

Jim Tingey

Poor idea, in my opinion; it would be a shame it the "alternative" were pursued.

To continue to provide employees with a sense of investment in this place at a time when the UC contract is up in the air, after the fire, and after the bashing and embarrassment the lab and its people has had to put up post-Wen Ho Lee/post-hard drives, it's important to keep and get as many lab people out in our forty-something square miles as possible.

Closing the trails would constitute a serious public relations and employee morale mistake, in my opinion.

Add to that the security importance of having random cleared eyes perusing random parts of our land on a semi-random basis (at a time when the lab would make a lovely terrorist target, in the unclassified opinion of some), and you have an abundance of reasons for not "fixing" something that not only isn't broken but also is working well.

Maco Stewart
NIS-17

Thanks for your quick response, Elizabeth!

I guess that I'm also concerned about the "slippery slope" aspect to trail closures. For example, the no access signs appear to go up and never come down unless a letter is written to John Browne at future@lanl.gov. I still don't understand these dry condition closures recently. Is there some perception that trail runners, hikers, and mountain bikers are going to me smoking out there and starting fires. We need to let common sense prevail, and that's my whole concern with this whole trail management program. Who foots the bill for all of this anyway? It seems to me that it establishes yet another drain on LANL resources.

I think I need to take a run (up at the ski hill where I will be endangering my safety because I have to drive up there to reach the trails now that the LANL trails are closed) to calm down.

Thanks for letting us vent.

SRT

>Dear Mr. Taylor: Thank you for your comment message. We think that closing
>all trails to recreational use would be a bad idea too - hence our proposal
>to establish a trails management program. E. Withers
>

My background: I am employed at LANL, coming from Germany, am now an American citizen since 1994. A major attraction in assuming a permanent job at LANL was the possibility of having horses at our property in La Senda and having access to riding and hiking trails on adjacent land. We have in past years participated in endurance rides, and the possibility of training the horses on closely located recreational areas was a very important factor. My wife and I are actively involved in search and rescue, using dogs for finding lost people. The training of the rescue dogs requires access to varying environments and open areas.

From my own experience and those of friends, I can conclude that the accessibility of recreational land adjacent to the residential areas, most of it located on LANL/DOE land, is an extremely important factor in choosing to live and work at Los Alamos. Any major restriction of that access will have a severe negative impact on

- The quality of life in Los Alamos
- The attraction to new hires to Los Alamos
- The attraction to visitors (official and non-official) and tourists
- The property value
- The efficiency of training for search and rescue teams

The proposed Trails Management Program in principle has the possibility of severely damaging existing recreational and training possibilities as well as improving upon those possibilities. The most important factor in finding solutions that are satisfying to all interested parties is the adequate representation of those parties. My particular concern is the lack of adequate representation of users of the LANL/DOE trails in the proposed Trails Assessment Working Group. This lack is not only of relevance for representation of their interests but also because the users are the most knowledgeable in the identification of existing trails and connections. I strongly urge you to include representation of such users, associated with organizations such as the Pajarito Riding Club, the Sheriff's Posse, the search and rescue organization Mountain Canine Corps, and others, as well as non-organized users.

Joachim Birn

I find this draft to be very disturbing. As noted on P. 36 of the EA, the access to the trail system and outdoor activities indeed attracts LANL staff to Los Alamos. People don't come here because of the desire for "big city" life and I speculate that many leave because of the lack of activities on the hill besides outdoor recreational opportunities. I worked at LLNL for 11 years and was concerned of quality of life issues in the increasingly congested Livermore Valley and the difficult access to the Sierras (and congestion once accessed). Los Alamos presented an opportunity to live in a uncongested, beautiful environment in the mountains and still be able to perform exciting and relevant scientific research. The possibility of trail running on nearby LANL trails during lunch hour is fantastic. Although the enjoyment has decreased some due to the fire and bark beetle kill, it is still fun to watch the forest rejuvenate. However, I recently have been presented with a very desirable scientific position with another agency in a different location. I have difficulty thinking about leaving Los Alamos and LANL, but I do think laboratory trail closures will probably be the final straw in my decision (this on top of all the problems with LANL UC problems, bureaucrazy (intentional misspelling) run amok (as evidenced by this 71 page EA document), and the continual attacks on LANL and lack of strong leadership to push back on the unfunded, bureaucratic mandates imposed on the laboratory.

I should also say that I recognize that one of the pictures (canyon closed) sign at the lower portion of Los Alamos Canyon. This sign came up not long after the fire when the closure was for safety reasons. I remember sending a letter to John Browne when the sign failed to come down during the winter (noting that the County ice rink was open up stream). He said "done" and took the sign down. But, alas, it has reappeared. We need to LET REASON AND COMMON SENSE

PREVAIL and let folks take responsibility for their action and safety in these situations.

If you would like a response please provide your name and a mailing address:

Steven R. Taylor

Recreational use of trails on LANL land by LANL employees is important to the well-being of the Laboratory workforce. My personal use has included several thousand hours of jogging on trails in upper and lower Mortendad Canyon, on the "Inside Passage" trail between TA-3 and TA-16, in upper Pajarito Canyon, etc. Jogging on trails has significant safety and health advantages compared to jogging on sidewalks on roads including reduced danger from and to vehicular traffic and reduced stress to the joints of the legs (particularly important to our aging Lab workforce). Availability of a natural setting near to the workplace has tremendous psychological benefits for a workforce in highly stressful jobs.

David Scudder

Hello All,

I am a long time resident of White Rock. I am also a home owner in Pajarito Acres. Over the course of my lifetime I have enjoyed playing in the canyons and mesas South of White Rock. As a boy, I learned to ride a dirt bike in water canyon. I also enjoyed using the old dirt pit for a target practice area. These days, I can only enjoy waking my dog on the trails and roads that I used to have unlimited access to. Now I hear that this area may get closed completely. With everything that is happening around this community, I am finding it harder and harder to work and live in Los Alamos. The hardworking people of our community need open places to recreate and spend time with their families. The DOE should consider the impact on the quality of life of their work force that such a closure would have.

I have already started my search for a new job outside of New Mexico. I won't be hard to find a better place work and live.

Jeff Johnson

Ms. Withers,

Please find attached my comments regarding the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program.

I feel it is important that management of LANL trails be carefully implemented, with due regard given to the varied uses of these trails.

Thank you for the opportunity to comment on this matter.

Regards,

D. Dogruel

David Dogruel

As an occasional user of LANL trails for recreation, I feel that continued access to these trails provides positive LANL and employee benefits that are not adequately acknowledged in the draft Environmental Assessment. The trails around LANL have been used for many years by employees for hiking, running, mountain biking, or simply getting away from the office for some peace or exercise. These activities are all have low environmental impact, and through management of existing trails, any future impact can be minimzed.

LANL has tech areas spread out over the entire Pajarito Plateau, with only one central exercise facility. It is logistically impossible for all employees to access and use this facility, and therefore, the trails, which are also spread out over much of LANL, are valuable recreational outlets to many employees. The employees who utilize these trails also provide a benefit to the safety and security of outlying LANL areas, as they provide the eyes and ears in these areas that are not routinely patrolled or monitored by LANL security forces. Continued employee access to the LANL trail system benefits the employees, LANL, and the environment, and I urge the consideration of these benefits in the analysis of the trails in and around LANL.

DEPARTMENT OF PUBLIC SAFETY

NEW MEXICO STATE POLICE

Bill Richardson
Governor

John Denko Jr.
Cabinet Secretary

Carlos R. Maldonado
Deputy Secretary / Chief Operations

Marie "Sisi" Saenz
Deputy Secretary Administration

August 4, 2003

Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street
Los Alamos, NM 87544

Comment on the Predecisional Draft Environmental Assessment (EA) for the Proposed Los Alamos National Laboratory (LANL) Trails Management Program (DOE/EA-1431)

I am the New Mexico State Police Search and Rescue Resource Officer and am writing about the team Mountain Canine Corps (MCC). MCC is actively involved in search and rescue emergency activities in the state of New Mexico. They respond to all search missions they are called out for and have contributed a great deal to the health and safety of the citizens of New Mexico (as well as those people in distress who are visiting New Mexico from elsewhere). Through many years, MCC has been an effective resource in the search and rescue community. Because of the nature of canine search and rescue, they train often and their preparedness for missions are an asset to the state of New Mexico.

I also am aware, having myself attended a mock search on the Laboratory land in the White Rock area in October of 2002, that MCC extensively uses the trails and areas that would be affected by the alternatives posed in the Environmental Assessment.

Sincerely,

James Newberry
Search and Rescue
Resource Officer
NM State Police

Office of the Secretary 827-3370	Deputy Secretary/Chief New Mexico State Police 827-9002	Special Investigations Albuquerque 841-8053	Motor Transportation 827-0321	Office of Emergency Services and Security 476-9600
Training and Recruiting 827-9251	Technical & Emergency Support 476-9600	Information Technology 827-9121	Support Services 827-9016	

P. O. Box 1628 • Santa Fe, New Mexico 87504-1628

Dear E. W.

Closing the walking trails is very bad idea. Motorized vehicles should not be in the woods,
but us walkers cannot make sparks with our tennis! I walk every lunch hour for my health,
I am diabetic, not walking is not an option. If I have to walk on the highway, that is very
dangerous. Example: last week there was a new bright blue pickup turning to TA-16 (I work here) and it was hit by a van. Driver of the van said " He did not see the pickup." I do not want to but my life in danger on the highway, all them huge SUVs, pickups etcr with people on cellphones, eating, not paying attention, if they cannot see a vehicle, how are they going to see me, I am only 5'3" tall?
Please use some common sense if the is any left here in LA

Helena

Helena Korhonen

Hi,
I would like to volunteer for the trails management committee. I am a trained and certified trails development technician and have designed and worked on several trails in the area. I have done GPS mapping (I have a full set of computerized topos and can upload from my GPS unit) of old, new, and suggested rerouting of trails. I have lived in Los Alamos for 18 years and, I think, know every trail in the area. I am a staff member (quantum physicist) in P-21 and I care deeply about the trails in our area.
Thank you.

--
Jane E. Nordholt

As a member of Los Alamos Search/Rescue, I would hate to see these lands closed as they would directly affect our training and effectiveness as a public service organization.

Laurie Rossi

Please consider the time factor involved if all employees who NEED to exercise are obliged to travel to a gym or the Wellness Center. This often requires longer than the 1 hour lunch break, or a very long day (>9hours). If we can let people relieve stress through exercise and still be at their jobs and productive the required hours, it sounds like a win/win situation. Stepping out your office door for a walk is one of the perks of working at Los Alamos Lab.

Judy Buckingham

Access to the lands around LANL is one of the primary benefits of working here at the lab. Many people choose to come to Los Alamos because of the outdoor setting and recreational opportunities (lets face it they certainly do not come here for the fine dining or nightlife). Thus, I believe that the lab has to seriously consider what the impact would be of closing off access to their land on a workforce which in many ways already has a low morale. With the UC contract in question and funding shortages many more people are looking elsewhere for job opportunities and our ability to recruit new employees is significantly hampered. The fine hiking trails around here (generally open to the public yet located on LANL land) are in my mind one of the key selling points as to why someone might wish to work and live in Los Alamos.

Los Alamos County is the smallest in the state. We are lucky however to be surrounded by National Forest lands, BLM, National Monument, Indian, and LANL lands. Unfortunately many of those lands which were once open to the public are now closed for assorted reasons. More and more land is being returned to the Indians who now seem to have an on going policy to restrict access to their lands. (As a child here in NM I remember hiking the Old Chile Linetrail along the banks of the Rio or driving the back dirt road to LA past the rifle range all are now inaccessible to the general public). In addition, a compliment of the Cerro Grande fire, much of the fine hiking in the immediate vicinity has been burned. Though the area is recovering many people choose to not hike in the area for several reasons. First is that it is not safe as dead trees fall daily and unexpectedly, and secondly many people can not or will not enter the area for emotional reasons as the memories of the fire are still too fresh in their minds. To even consider taking away the LANL lands at this time from public access is poor judgment and poor forethought.

I hope LANL will do all it can do to keep the spirit of Los Alamos alive, to help improve morale here at the lab rather than reduce it, and to continue to be a good neighbor to LA county by promoting health, activity, and happiness to any and all who chose to visit or live here in Los Alamos. Please, keep the LANL lands open!

Katie Forman

hi elizabeth,

i have not read the assessment in gory detail but i wanted to jot off a few comments before you terminate the unofficial comment period.

i realize how difficult it is to set something up as multi-use and meet everybody's needs.

i also understand that issues have been raised regarding erosion and unauthorized trail work. i agree in concept with some of these complaints in that i have been dismayed that some of the trail improvements and stabilization efforts have degraded the trails from my perspective (they have been made smoother and less technical, less fun). even though i may not agree with all the work that has been done, i do think it has been done responsibly with the intent and result of stabilizing the trail and surrounding areas from erosion. i question whether the small negatives associated with unauthorized trail building, maintenance, and use justify this huge assessment with its potential of greatly limiting or eliminating this fine public trail network.

i'd like to request that the wording of the 5 selection criteria be reconsidered. it seems the very first criterion, which negates any LANL/DOE mandate for recreation undermines the entire concept of a recreational system and biases the results at the outset toward a much more limited trail network. there are many other criteria that have been totally excluded including potential impacts on the mental and physical health of LANL's work force and LANL's ability to attract and retain needed employees, should the trails be limited or closed off from our use.

assuming the proposed alternative is chosen, i urge you to ensure that the composition of the panel that will be making evaluations and decisions be representative of current trail users. i have been riding these trails for years and by far the greatest number of users are cyclists, hikers, and runners. i have never seen an equestrian in all the years i have frequented these trails. i also bring to your attention the negative impact that motorcyclists and four wheelers have on all trails and hope that they are banned on all trails in the area. all users have some impact but the impact of motorized vehicles is so much greater than other users that trails are effectively ruined for any other use after very few days of moderate motor vehicle usage.

thanks for extending the comment period a little bit and for your consideration of my comments. for many of us, use of this trail network is an integral and fundamental aspect of our employment and/or residence here. at a time when LANL/DOE are in crisis trying to attract and retain qualified employees, reduction or other limitation of our trail usage sounds like a very bad idea especially since there are such limited (and questionable) potential positive impacts.

dave kraig

I have several comments pertaining to the Environmental Assessment and its impact on LANL workers and Los Alamos residents. I believe there would be a significant impact on the well-being of this community should recreational trails be closed to the public, both in terms of morale and community interests.

As a LANL employee, I consider the recreational trails one of the major assets of working at this laboratory and at the site where I work. Until recently, the use of these trails was encouraged by management and by publications from the Wellness Center that promote exercise and stress reduction. I recall reading a strong exhortation from Pete Nanos (February 4 LIM notes) encouraging all lab workers to set aside half an hour a day to exercise in order to counter stress (particularly during this stressful period at the lab.) For me, like many at TA-35, the only exercise I can fit into half an hour is a walk or jog in the canyon behind my building. If this is so strongly encouraged by management, I find it counter-intuitive that all recreational paths for those of us not lucky enough to work close to the Wellness Center should be closed. Does it really make sense to encourage LANL employees to exercise and relieve stress while shutting the major areas where it is possible to do so? Have you considered what impacts this will have on worker morale?

I am a member of the Mountain Canine Corp, a group which provides a service to this community and to the State by using trained dogs to help find lost persons (generally in wilderness settings.) This service depends on being able to train where dogs and handlers can practice in real-life settings, including DOE land, which has provided excellent and varied training options. Should these areas be closed to the team, it will severely reduce the number of locations near town where we can practice, which in turn will have a negative impact on the team's ability to serve the community. I know a longer letter has been sent on behalf of the team, so I will limit my remarks on this topic, but want to make it clear that the decision to close these areas will affect more than just the search and rescue teams, it will also affect the larger interests of the community and the state resources that depend on having teams that can train in their community in a variety of settings.

A final consideration is the impact that closing these areas will have on other recreational areas. Since the Cerro Grande fire, I have observed a large increase in recreational use of Pueblo canyon due to the fact that it was not burned and does not close when other areas are closed due to fire restrictions. The impact on Pueblo Canyon has been significant and very negative. It will only worsen should other recreational areas be closed, and the negative impact to other recreational areas will also increase. This will have an overall negative impact on the interests of the community as it struggles to recover from the effects of the fire and the limited recreational options now that many areas have burned.

I hope your assessment will take into consideration these concerns. I find it troubling that the form you provided at the Public Meeting asks whether we would like to receive a copy of the final EA and the "Finding of No Significant Impact." My belief, which I hope is echoed by many others in this community, is that there would indeed be a significant impact, and I hope you have not already drawn your conclusions before hearing the concerns of the community.

Rebecca Stevens