

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 to 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<sup>2</sup> 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: the PreDecision 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  
BANDELER 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 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 commitments 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 cannot 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 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 necessity 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 of 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 field 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 Schilliacci

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.



**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 a 15 year old girl and a small business owner in Northern 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  No Thanks

**If "Yes", where should it be sent?**

Deborah Francisco  
[Redacted]  
[Redacted]  
[Redacted]

**If you would like to mail your comments send them to:**

Elizabeth Withers, NEPA Compliance Officer  
Los Alamos Site Office  
528 35<sup>th</sup> 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 ~~an~~ environmental 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 environment, away.

Sincerely,  
Deborah Francisco  
age 15 owner of Eaglewings horseback riding school