

Errata for *Lassen Peak Trail Rehabilitation* Environmental Assessment

This Errata document consists of two parts. The first section provides a catalog of the clarifications, corrections, and changes made to the Lassen Peak Trail Rehabilitation Environmental Assessment since its original release for comment. Revised or new language is noted. The second section provides a record of EA comments and responses.

Section 1 Note: Page numbers and paragraphing noted below correspond to the PDF version of the EA. For printed version, the document, printed via different printers, would have slightly different page numbers and paragraphing.

Purpose and Need, Page 11, last bullet: Insert a slash following “road” and add “Volcanic Legacy Scenic Byway – All American Road.”

Purpose and Need, Page 11: To the end of the last sentence, add the following: “These social trails at the end of the Manzanita Creek Trail and around Vulcan’s Castle are clearly visible on high-resolution aerial photos and are being used by visitors who hike cross-country between these two areas.”

Alternatives, Page 28, 4th paragraph: Insert “dry-laid” before “steps” in the last sentence.

Alternatives, Page 28, last paragraph, 2nd to last sentence: Replace “Lost Creek Quarry” with “helipads in the park.”

Alternatives, Page 29, 3rd paragraph: Insert “visitor use,” before “snow creep.”

Alternatives, Page 29, 5th paragraph: Insert “In the future,” at the beginning of the first sentence and change “would” to “could.”

Alternatives, Page 31, last paragraph: Insert “approximately” before “15 percent” and delete “or less” after it.

Alternatives, Page 32, 5th paragraph: Add the following: To allow additional visitors to sign the summit register, the register would be located at the summit plateau until the repeater was removed. Upon repeater removal, evaluation of whether to retain the register at both the true summit and summit plateau would be made.”

Alternatives, Page 33, 1st paragraph below table: Delete “(18-inches wide)” from the 1st sentence under “Summit Crater Area.”

Alternatives, Page 33, 1st paragraph below “True Summit”: After “alignment” insert “, with a variable width that would not exceed 24 inches.” Delete “and would be approximately 18 inches wide, while” and begin a new sentence with “The.”

Alternatives, Page 33, Summit Register: Delete “and a new summit register would be located more prominently and replace with “The summit register would be retained in its current location but would also be located at the summit plateau area, pending removal of the radio repeater structure. Evaluation of the locations would be made when the repeater is removed and there is a potential that it would remain in both locations evaluated.”

Alternatives, Page 33, 3rd paragraph: Insert “in the EA” after “Appendix 2.”

Alternatives, Page 34, 2nd paragraph: To the end add the following: “Other small drainages would be crossed by means of a puncheon, an elevated walkway which allows for water to freely pass underneath. The exact mixture of puncheons, wooden bridges and large rock crossings has not been determined.”

Alternatives, Page 37, Last paragraph, 2nd sentence: Delete “low solar gain.”

Affected Environment, Page 53, after 3rd paragraph (above the table): Add the following: “Whitebark Pine is currently under internal review by the USFWS to assess whether whitebark pine should become a candidate for federal listing as threatened or endangered. This internal review is being conducted prior to a timed official review period and is not court ordered. The USFWS intent to review this species was published in the Federal Register (Federal Register, Vol. 74, No. 241, Thursday, December 17, 2009, USFWS).” Both mature and young whitebark pines are found along the Lassen Peak Trail and the proposed Manzanita Creek Connector Trail.

Affected Environment, Page 57, following 4th Paragraph: Add the following three paragraphs: “Pika (*Ochotona princeps*): Although the pika is not currently listed, as threatened or endangered, the USFWS is analyzing data to consider whether it should become a candidate for federal listing. The State of California is also conducting a review of the species. The federal review ends on February 1, 2010 and it would take a minimum of an additional 45 days before the species could become a candidate for listing.

Pika have been seen and heard in several locations along the proposed trail route between Ski Heil Saddle and Crescent Cliffs. The proposed trail route passes through talus in four locations for a total distance of 400 - 500 meters. Park staff have been surveying for pika throughout the park for the past three summers. Where talus is appropriately sized in Lassen, pika are fairly common.

Environmental Consequences, Page 57: Construction of the proposed connector trail would occur after the young have left the dens (June). The proposed trail work could have short-term minor effect from displacing a few adults. The potential habit loss (directly underneath and adjacent to the trail) in the four traversed talus areas is less than one percent of each talus field. Because talus is a common habitat in the park, effects from loss of this small area of habitat would be negligible to minor.”

Affected Environment, Page 57, 2nd to last paragraph: To end add: “The last known observation of a prairie falcon was ten years ago. Prairie Falcon young fledge in July and the Ski Heil saddle is under snow until July most years. Since summer hikers rarely cross long snowfields, the overlap between nesting time and visitors using the trail would be a few weeks at most.

Environmental Consequences, Page 76, 1st bullet: Replace with Locating staging areas where they would minimize new disturbance of area soils ,vegetation and butterflies.

Environmental Consequences, Page 76, 9th bullet: To end add “where appropriate and viable.”
Environmental Consequences, Page 77, 1st bullet: Delete

Environmental Consequences, Page 78, 7th paragraph: Insert the following prior to the last sentence: “Although the proposed route of the trail would pass within 70 meters of the wet meadow, the line of sight to this meadow is obscured by trees and it would be difficult to see. The meadow would also be visible after leaving the Ski Heil saddle, when the trail passes approximately 400 vertical feet above it above a large talus field, which would deter most visitors from crossing over to it. The trail routing to minimize views was intentional. Park resources staff recognizes this meadow is a unique resource and will investigate further options to give it increased protection.”

Environmental Consequences, Page 82: add bullet “ The wildlife biologist will survey for active raptor nests each summer prior to work on the connector trail. If nests are located a limited operating period will be established.”

Environmental Consequences, Page 83: 3rd bullet: Delete “or avoided.”

Environmental Consequences, Page 83: Following 3rd bullet, add “Construction of the proposed connector trail would occur after young pika have left the dens (June).”

Environmental Consequences, Page 84, 1st bullet: Add “for” between “undertaken” and “rare” Add “nesting” between “rare” and “species”. In second sentence delete “for either the Manzanita Connector Trail, or”

Environmental Consequences, Special Status Species Mitigation Measures, Page 84, 1st bullet: To the end of the first sentence, add “and in high elevation areas alongside the Lassen Peak Trail (all Alternatives).”

Environmental Consequences, Special Status Species Mitigation Measures, Page 84: To end of bulleted list, add: “If the pika or whitebark pine become federally listed, prior to rehabilitation of the Lassen Peak Trail or construction of the Manzanita Creek Connector Trail, the NPS would reinitiate consultation with the USFWS under Section 7 of the Endangered Species Act.”

Environmental Consequences, Special Status Species Mitigation Measures, Page 84: To end of bulleted list, add: “If Prairie Falcon were to be found nesting in vicinity of the proposed trail during pre-construction nest surveys the park would mitigate construction impacts by only allowing work once the young were fledged (limited operating period).”

Environmental Consequences, Page 88: Delete 4th bullet and replace with “Documenting any historic contributing feature that is to be removed to HABS/HAER standards.”

Environmental Consequences, Page 91, 3rd bullet: Add “if the trail is open” to end.

Environmental Consequences, Page 91: Delete 6th bullet.

Section 2: Public Comment and Response Summary

The EA was released for public review from Dec. 9, 2009 through Jan. 11, 2010. Approximately 115 printed and 35 CD documents were distributed; the EA was also made available at public libraries in Burney, Chester, Chico, Quincy, Red Bluff, Redding, Shingletown, and Susanville. In response to the EA, approximately 31 substantive comments were identified in approximately 133 letters and eMails. All comments received are maintained in the project administrative record. Although some comments resulted in minor modifications incorporated into the Selected Alternative, no changes were made in the assessment of environmental consequences, nor did any key issues surface which had not already been considered during the scoping phase or preparation of the EA.

Concerns expressed included the following:

- 1. Add a large warning sign at the base of the Lassen Peak Trail to notify hikers of safety and resource issues. This sign should address need for safety equipment in winter, information about the unstable nature of the trail and how to report problems.**

Additional information, noted above will be addressed at the Lassen Peak Trailhead in conjunction with trail rehabilitation. These issues have been and will continue to be part of the park’s education and interpretive strategy regarding the Lassen Peak Trail.

- 2. Including “increased personal electronic media programming” could interfere with experiential use of the Lassen Peak Trail.**

Because the numerous individuals and families that use the Lassen Peak Trail are very different in their expectations and knowledge about the trail and park, the interpretive and education program would continue to use a variety of means to reach people where they are to inform them of and to interpret Lassen resources. Use of interpretive programming, including signs, guided walks, and potential future electronic media, remains optional.

- 3. Shoulder season bypass steps should not be constructed of concrete.**

The proposed shoulder season bypass areas on the Lassen Peak Trail would likely be constructed of dry-laid rock.

4. Consider native rockwork and steel posts instead of cable and stanchions to true summit.

As noted in the EA, rock would be used for the true summit trail. The proposed cable would be strung along posts or "stanchions," which would likely be of steel construction, to assist visitors in traversing this unstable area.

5. The proposed Manzanita Creek Trail would also concentrate use in less sensitive areas (by designating a trail away from the sensitive Soda Lake / "pothole" meadows area) and would provide a designated trail through areas where visitors are clearly already hiking cross-country between the Lassen Peak Trail parking area and the Manzanita Creek Trail. These impacts are clearly visible on high resolution aerial photos and were easily demonstrated via an internet search.

As noted in the Purpose and Need, the trail has been proposed for several reasons, including decreasing social trails in sensitive areas. Therefore the trail has been specifically designed to avoid impacts to these sensitive areas (such as avoiding vistas of the Soda Lake area and selection of a route well away from sensitive high elevation meadows). Where the trail could facilitate use of sensitive areas and result in impacts, mitigation measures in the EA call for increased monitoring to ensure that these impacts are avoided.

6. More information should be provided about sensitive areas and species along the proposed trail.

See the Errata regarding the provision of some information that was inadvertently left out of the EA. Other specific information can be obtained by contacting park staff, including the park wildlife biologist, botanist and environmental protection specialist.

7. Consider undertaking additional study of high elevation plants adjacent to the Lassen Peak Trail and increasing protection for those that could be affected by trail rehabilitation. Although not currently on either state or federal endangered species lists, these plants warrant preservation, protection, and detailed study, because they may be at risk from climate change.

The NPS has called for mitigation measures in the EA that would continue surveys for rare species and increase protection for plants alongside the Lassen Peak Trail and in the Lassen Crater. These measures, including ongoing surveys, would be implemented as part of the selected alternative. Every effort has been and will continue to be made to avoid increasing use of sensitive areas.

8. There is not enough information to determine whether the alternatives would have "no effect" on listed species.

As noted in the Finding of No Significant Impact (FONSI), the USFWS has concurred with the determination of no effect based on information included in the EA and through follow-up phone consultation.

9. References do not include specific scientific studies for species of special concern and sensitive habitats.

The references provide information about studies cited in the EA. For a more detailed bibliography of park studies, please consult the General Management Plan or the park's website or contact the park regarding specific studies for species and habitats of interest.

10. Consider the visibility of the proposed connector trail from the Lake Helen area.

Informal analysis of scenic resources impacts of the proposed connector trail have noted that the trail would potentially be visible from one pullout along the Lassen Peak Highway, where it might be possible to look over at it.

11. Establish a more expansive viewpoint on the north side of the summit plateau with a full view of Mount Shasta

Based on public comments, this action was considered as part of the summit crater loop trail; however, because the selected alternative calls for a route instead of a well-developed trail, it was rejected. While

this view would remain possible, the viewpoint would not be emphasized. Later, if visitor use patterns change, this viewpoint could be reconsidered.

12. Consider rehabilitating rock-climbing social trail from Peak Parking Lot to avoid increased use.

The current rock-climbing trail is considered an access trail, rather than a social trail, and would not be rehabilitated because it would likely be reestablished by the small number of climbers who use it. Additional use of this trail is unlikely because the proposed connector trail does not connect with it and has been specifically designed to avoid sensitive areas near Vulcan's castle.

13. Consider mitigating social trails by restoration, barricades, video trail monitoring, and substantially increased ranger foot patrols.

Although the first two measures are commonly used and the last is used during staff patrols, video trail monitoring is a more intrusive technique that would likely have more impacts than it solved.

14. Retain "historic" interpretive signs.

Technically, there are no historic interpretive signs on the Lassen Peak Trail. Some signs dating from the 1970s have outlived not only the information portrayed on them but also their design life and would be removed under all alternatives.

15. Provide separate analysis for the Manzanita Creek Trail.

In the EA, the proposed Manzanita Creek Connector Trail was proposed to diversify the visitor experience associated with Lassen Peak and to accommodate existing use already occurring in the area on a formal trail to minimize overall impacts. Therefore, this option was included in the EA as part of two of the four alternatives. If mitigation measures in the EA, such as monitoring social trail development, provide additional information about impacts not analyzed in the EA, the project would either be modified to avoid them or additional environmental analysis and/or consultation with the USFWS would be reinitiated.

16. Additional surveys for species / habitats present along the proposed connector trail should be undertaken.

At least five park staff have undertaken approximately 3-4 separate surveys of the flagged route of the proposed trail alignment, including specific surveys for rare plants, birds, wildlife and wetlands. As noted in the mitigation measures in the EA, additional surveys would be undertaken as the trail is constructed to ensure that conservation measures for rare and listed species are implemented and/or to identify seasonal closures.

17. Because the proposed connector trail is so long, it would likely take most visitors two days to reach Lassen Peak, therefore camping would likely increase and affect nearby sensitive areas, such as Soda Lake.

The NPS concurs that this might be true for a few visitors. As a result, it is likely that, based on monitoring of visitor use, the Soda Lake area would be closed to camping. Park camping regulations already prevent camping in sensitive areas, such as wetlands and small lakes.

18. The EA is confusing about how drainages would be crossed (one section identifies four perennial drainages that would be bridged or crossed above their origin; while another section states that large rocks would facilitate crossings).

There would be a variety of measures used to cross intermittent creeks in the proposed project area. Among these measures would be avoidance of the crossing, rock stepping stones, and puncheon trail or bridges. Of these, the measure that would be most effective, with the least impact to the environment (including from construction and maintenance) would be selected. An important criterion in selecting the crossing measure would be to avoid impeding the flow of water. Most of the crossings would be in the vicinity of the Crescent Cliffs area where multiple headwater streams feeding Manzanita Creek originate. Although most of these are likely intermittent drainages, water observed in late September / October indicates that they may be spring fed. There would also likely be at least one bridge crossing of a tributary to Manzanita Creek.

19. The EA is confusing about extent of work in talus (pika habitat).

Additional consultation with the USFWS regarding the determination of no effect on listed species has provided some additional conservation measures that would be implemented to reduce potential impacts to pikas. Although the pika is not currently listed, as threatened or endangered, the USFWS is analyzing data to consider whether it should become a candidate for federal listing. The State of California is also conducting a review of the species. The federal review ends on February 1, 2010 and it would take a minimum of an additional 45 days before the species could become a candidate for listing.

As noted above in Section 1, relevant information has been added to the Affected Environment and Environmental Consequences sections of the EA.

Existing mitigation measures in the EA, noted below, call for additional monitoring to ensure that effects remain small.

- Modifying Manzanita Lake Connector Trail construction if active nesting of a sensitive species was found.
- Minimizing rock work in occupied pika habitat.
- Undertaking additional surveys for rare species prior to the construction of the Manzanita Creek Connector Trail.

20. Consider retaining, remodeling and signing the radio repeater, which is critical for Lassen National Forest operations.

The current radio facility includes an approximately ten by 20 foot conical building and an approximately five by five by ten foot photovoltaic stand and array. The facility includes a radio repeater and a global positioning system transmitter for the National Park Service, and a radio repeater for Lassen National Forest (U.S. Forest Service).

The Department of Interior has mandated a change to narrowbanding and digital radio systems and radio repeaters for the National Park Service. Because of this change, the installation on Lassen Peak will be required to expand to accommodate additional electronic equipment and additional photovoltaic panels. There is also indication that the U.S. Forest Service will also be required to conduct a similar equipment changeover. This will further necessitate expansion of the facility. Visitors to the summit of Lassen Peak have voiced their disappointment at the placement of the installation on the peak's summit, citing it as an eyesore and a blight to the otherwise natural landscape. Visitors on the Park's roadway and parking lots have also voiced their disappointment at the sight of the installation.

Lassen Peak communications site has been unreliable in the past. Severe weather plays havoc with the hardware which has, in the past, broken down for long periods of time. Repairs of the equipment during the winter, which is the common time for breakdowns, create a dangerous situation. It is often nearly impossible to access the repeater due to high winds, high avalanche danger, and extreme temperatures. Since this is a roadless area, even summer access to the site for preventive maintenance is problematic.

The Park intends to remove their radio repeater hardware in the summer of 2010. However, the removal of the physical structure and solar panels will occur in approximately three years. The Lassen National Forest radio repeater will have the ability to function in the interim. This will allow time for any system modifications to "Fire Net" to accommodate this change. The Park will work with Lassen National Forest on any further accommodations needed to make any radio system reconfiguration as safe as possible. With the upgrades suggested at a meeting between NPS and U.S. Forest Service representatives, much of the loss of this radio repeater can be mitigated. Frequency maps that modeled frequency use on Fire Net showed a high potential of recapturing that loss.

OUTSIDE OF SCOPE

The following comments were outside the scope of the Environmental Assessment because they call for additional trails or other actions not related to the purpose and need for the project:

- Consider extending the Manzanita Creek Trail up Loomis Peak.
- Consider a trail from Summit Lake campgrounds up existing Shadow-Terrace- Cliff Lakes Trail and across a new trail to the Peak Parking Lot.

- Park should consider a trails plan to address trail needs holistically and proactively.
- Consider loop trails (3 miles) through the Devastated Area and Chaos Crags area.
- Reopen Sulphur Works boardwalk.
- Every ranger should have basic first aid training.
- Drinking water monitoring does not mention testing for arsenic and mercury.
- When it is rebuilt and reopened rename the Lassen Peak Trail “Tommy’s Adventure Trail,” in memory of Tommy Botell who lost his life July 29, 2009 while hiking that very same trail with his family. The trail should use markers that recognize scout milestones such as Tiger, Wolf, Bear, etc. all the way to Eagle at the peak.

ACTIONS AND ALTERNATIVES REITERATED DURING PUBLIC REVIEW

1. Include Alternative C or D without the proposed Manzanita Creek Connector Trail

This alternative would be another variation of the alternatives within the EA. For instance, Alternatives A and B were evaluated without the proposed connector trail. As a result, because the decision-maker may choose actions from Alternatives A, B, C and/or D to create the selected alternative, selecting Alternative C or D without the proposed connector trail is an option and therefore does not need to be described separately in the EA.

2. Consider an alternative beginning for the trail starting above the road and then curving up through the trees to connect to existing route (to avoid short-cutting invited by initial switchback).

This alternative action was rejected because trail reroutes would have greater impacts than rehabilitation and because the trail route is historic. This proposal would also likely affect more trees, including the sensitive whitebark pine, which the project has been specifically designed to avoid.

3. Establish a more expansive viewpoint on the north side of the summit plateau with a full view of Mount Shasta

This alternative action was rejected because while the crater loop trail would allow this view, the proposed trail is intended to be more of a route that provides self-discovery for visitors within the crater area.