
National Park Service
U.S. Department of the Interior



Lake Clark National Park and Preserve
Alaska

Management of Off-Road Vehicles near Port Alsworth in Lake Clark National Preserve Environmental Assessment May 2008



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Lake Clark National Preserve
Environmental Assessment
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Note to Reviewers

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You may also comment online. Go to <http://parkplanning.nps.gov> to retrieve this document on the website and provide comments electronically. You may also send comments to Joel_Hard@nps.gov.

Cover Photo: ORV on Port Alsworth woodlot trail.

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PURPOSE AND NEED

The National Park Service (NPS) is considering designating existing trails for off-road vehicle (ORV) use in the woodlots near Port Alsworth in Lake Clark National Preserve (Figure 1). The NPS is proposing this action to manage ORV use in this area to minimize adverse impacts to the resources and values for which the park was established while also providing reasonable access to subsistence firewood resources. Subsistence firewood gathering is allowed and firewood cutting is permitted under NPS regulations (36 CFR 13.485). Currently no trails or routes have been designated for general travel purposes in the Port Alsworth area.

From a practical standpoint, it is difficult to distinguish between ORVs uses for subsistence purposes and other uses, such as recreation. Therefore, the NPS proposes to designate ORV trails for all users. The designation of ORV trails would be authorized through special regulations in accordance with 36 CFR 4.10.

The Port Alsworth area is remote and accessible primarily by aircraft. Woodcutting has occurred in the area since the first prospectors arrived to camp near the mouth of the Tanalian River between 1898 and 1910. Today, ORVs are used to access firewood resources near the community of Port Alsworth, especially when Lake Clark doesn't freeze and/or there is not adequate snowcover to use snowmachines to get to more distant timber resources. Local residents have been using tractors since 1945 and ORVs since the mid 1970s to access the woodcutting areas near Port Alsworth for subsistence firewood harvesting. This use has created a network of ORV trails and has damaged vegetation and aesthetic qualities of the area. There is a need to designate ORV trails to protect park resources while ensuring local residents can access locations where subsistence firewood harvesting activities have historically occurred.

Over the years the ORV trail network has expanded throughout the woodcutting areas within the ½ mile corridor along the Tanalian River that local residents refer to as the “woodlots.” Currently there are about 3.5 miles of ORV trails in the Port Alsworth area that are on NPS land. There are approximately 2.2 miles on private land and 0.85 miles on Native Corporation land in the Port Alsworth area. The main trail used to access woodcutting areas (Figure 1) is also an access route to a Tanalian Incorporated inholding. The trail network has resulted in trails providing duplicate access and an increase in adverse impacts to park resources and values. ORV trails have degraded habitats by compacting soils and trampling vegetation and they have degraded the scenic quality of the area. Limiting ORV access to designated trails is necessary to prevent undue resource damage while providing access to the woodcutting areas.

This environmental assessment (EA) analyzes a no-action alternative and two alternatives for managing ORV access. The EA has been prepared in accordance with the National Environmental Policy Act of 1969 and regulations promulgated by the Council of Environmental Quality in Title 40 of the Code of Federal Regulations (CFR). Neither this proposal, nor subsequent regulations, will address or restrict inholder access, since this is covered separately by Section 1110(b) of the Alaska National Interest Lands Conservation Act (ANILCA) and the Alaska Region's Interim Guide to Inholder Access.

Park Purposes and Significance

The purposes for which LACL was created are found in the language of ANILCA. As a unit of the National Park System, Lake Clark National Park and Preserve shall be administered to:

- protect the watershed necessary for the perpetuation of the red salmon fishery in Bristol Bay;
- maintain unimpaired the scenic beauty and quality of portions of the Alaska Range and Aleutian Range, including active volcanoes, glaciers, wild rivers, lakes, waterfalls, and alpine meadows in their natural state; and
- protect habitat for and populations of fish and wildlife including but not limited to caribou, Dall sheep, brown/grizzly bears, bald eagles, and peregrine falcons.

Lake Clark National Park and Preserve encompasses four million acres of diverse ecosystems adjoining the Alaska and Aleutian Mountain Ranges in Southwest Alaska. The park and preserve protect 2.5 million acres of designated Wilderness, three Wild Rivers and other features of national natural significance.

The convergence of multiple large ecosystems within the park and preserve, as well as changes from Pleistocene glaciation, has resulted in diverse natural resources and vegetative communities within the park and preserve.

Cultural resources include prehistoric and historic Dena'ina archeological sites, sites related to historic Russian-American era fur trading and the development of regional travel and ethnographic values related to contemporary Dena'ina and "Bush" life styles.

Recreational uses focus on non-consumptive river floating, day hiking, sportfishing, bear viewing and backpacking. These activities occur along coastal areas, upper lakes region, river corridors and in numerous areas of natural and cultural resource interest. Subsistence hunting, general hunting, and commercial hunting occur throughout the park and preserve depending on eligibility. Subsistence and sport fishing occur throughout the park.

Legal Context

General Direction for Public Enjoyment and Resource Protection

The 1916 Organic Act directed the Secretary of the Interior and the NPS to manage units of the national park system to:

“...conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” (16 U.S.C. 1.)

For all planning processes in the park system, the Organic Act provides a fundamental standard for management – that park resources should remain “unimpaired” for the enjoyment of future generations.

The Redwood National Park Expansion Act of 1978 (16 USC §§ 1-1a, 92 Statute 166) amends the Organic Act and clarifies the importance Congress placed on protecting park resources such that:

The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

Title I of ANILCA sets forth the reasons Congress established units including Lake Clark National Park and Preserve. Those reasons include preserving the natural and cultural resources in the park and preserve for the benefit, use, education, and inspiration of present and future generations.

Subsistence Management

Subsistence use is permitted in the park and preserve in accordance with the provisions of ANILCA Title VIII.

ANILCA Section 810 [16 USC §3120] states that the NPS shall evaluate the effect of certain federal actions on subsistence uses and needs. The ANILCA 810 Evaluation for this project is found in Appendix A of this document.

ANILCA Section 811 [16 USC § 3121(b)] provides for continued access to public lands for subsistence use. Specifically, it states that “. . . rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands” and “Notwithstanding any other provision of this Act or other law, the Secretary [of Interior] shall permit on the public lands appropriate use for subsistence purposes of snowmachines, motorboats and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulations.”

LACL’s 1984 General Management Plan states that the NPS will “ensure the protection of park timber resources while allowing for noncommercial harvest of house logs and firewood for subsistence purposes.” It also recognizes that additional local residents will compete for subsistence resources and that restrictions on use may become necessary. The section on Visitor Use states, “Existing traditional patterns and means of access and circulation will be maintained.”

ORV Management

36 CFR § 4.10 (Travel on park roads and designated routes) provides for the designation of off-road motor vehicle routes and areas via special regulations. It states: (a) Operating a motor vehicle is prohibited except on park roads, in parking areas and on routes and areas designated for off-road motor vehicle use. (b) Routes and areas designated for off-road motor vehicle use shall be promulgated as special regulations.

The designation of routes and areas shall comply with § 1.5 of this chapter and E.O. 11644 (37 FR 2887). Routes and areas may be designated only in national recreation areas, national seashores, national lakeshores and national preserves. (c) The following are prohibited: (1) Operating a motor vehicle not equipped with pneumatic tires, except that a track-laying motor vehicle or a motor vehicle equipped with a similar traction device may be operated on a route designated for these vehicles by the superintendent. (2) Operating a motor vehicle in a manner that causes unreasonable damage to the surface of a park road or route. (3) Operating a motor vehicle on a route or area designated for off-road motor vehicle use, from 1/2 hour after sunset to 1/2 hour before sunrise, without activated headlights and taillights that meet the requirements of State law for operation on a State highway.

Executive Order 11644 requires that ORV use will not adversely affect the natural, aesthetic or scenic values of the Preserve.

Issues

Issues and impact topics form the basis for environmental analysis. A brief rationale is provided for each issue or topic that is analyzed in the environmental consequences section of this EA.

Subsistence Firewood Harvest: Subsistence firewood harvesters could be affected by management of ORV access. See also Appendix A.

Vegetation and Soils: Vegetation and soils could be impacted directly by use of ORVs and indirectly by an increase or decrease in timber harvest. Impacts could include change in species in a plant community, reduction in plant cover, simplification of the vegetation structure, and alteration of the habitat for plant growth.

Natural, Aesthetic, and Scenic Values: Impacts could include an increase or decrease in natural, aesthetic, and scenic values from creation or recovery of ORV trails. Indirect impacts could result from an increase or decrease in timber cutting caused by increased or diminished opportunities for ORV access.

Issues Eliminated from Further Consideration

Threatened and Endangered Species: No federally designated threatened or endangered species are known to occur within LACL.

Wildlife: An NPS study (NPS 1999) found that wildlife use in the woodlots was infrequent. In addition, the area of concern is small (about 51 acres) and the wildlife species that use the area (birds and squirrels) do not appear to be impacted by current ORV use.

Cultural Resources: Cultural resources in the woodlot area are not likely to be affected by continued ORV use for the subsistence harvest of firewood.

Air Quality: Exhaust emissions produced by ORVs used for subsistence firewood collection would have a negligible effect on the area's air quality because of low ORV use levels. About 15 families use the trails for firewood collection.

Floodplains and Wetlands: The existing ORV trails are located on a gravel floodplain which is compatible with ORV use. There are virtually no wetlands in the project area.

Wilderness Resource Values: LACL's 1984 General Management Plan states that the Port Alsworth area is not eligible for inclusion in the National Wilderness Preservation System.

Natural Soundscape: Noise generated by ORV would be minimal since only about 15 families in the Port Alsworth area participate in the harvest of subsistence firewood. In addition, noise generated by ORVs would be inconsequential to that created by aircraft at the two adjacent airstrips.

Local Communities/Socioeconomic Resources: Local communities would be minimally affected because this plan proposes to designate trails for ORV use; firewood harvest would continue in the area.

Environmental Justice: Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, requires all federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. This project would not result in significant changes in the socioeconomic environment of the area, and therefore is expected to have no direct or indirect impacts to minority or low-income populations or communities.

Permits and Approvals Needed to Complete the Project

Concurrence from the State Historic Preservation Officer will be required for any determinations of effect on eligible historic properties.

The NPS will submit a Negative Determination (Appendix C) to the State of Alaska, Department of Natural Resources, Office of Project Management and Permitting, to request concurrence that this project would not have any adverse effects on land and water resources of the State of Alaska's coastal zone.

DESCRIPTION OF ALTERNATIVES

Actions proposed in this EA apply only to NPS-managed lands. NPS would work with adjacent landowners to address long term access to/from designated trails in the National Preserve.

Criteria used for designating ORV trails in Alternative 2 and Alternative 3 are described in Appendix B.

Alternative 1 – No Action Alternative

Under the no-action alternative 3.51 miles of existing trails in the Port Alsworth area of Lake Clark National Preserve would continue to be used by off-road vehicles to support firewood collection and other activities (Figure 1).

Management of the existing trails would remain unchanged. Trail maintenance and marking would not be undertaken.

Alternative 2 – Designate Primary Trails for ORV Use

Alternative 2 would designate trails in the Port Alsworth area of Lake Clark National Preserve for ORV use that provide primary access to tree harvest areas in the woodlot. Existing trails not meeting this criterion or that provide duplicate access would not be designated (See Appendix B). Figure 2 identifies all trails designated as open to ORV use under this alternative.

This alternative would authorize ORV use on 1.54 miles of existing trails. ORV use off designated trails would be prohibited. Designated trails would be open to ORV use for any purpose. The designation of ORV trails would be authorized through special regulations in accordance with 36 CFR 4.10.

The NPS would delineate open trails on the ground and would post those trails not opened with obvious markings identifying them as closed to ORV use.

Generally each designated trail should be inspected and receive some basic annual maintenance. Existing trails are in good to fair condition so maintenance would be expected to be minimal. Closed trails would be allowed to revegetate naturally.

Alternative 3 – Designate Primary and Secondary Trails for ORV Use (NPS Preferred Alternative)

Alternative 3 would designate trails in the Port Alsworth area of Lake Clark National Preserve for ORV use that provide primary and secondary access to tree harvest areas in the woodlot. Existing trails not meeting this criterion or that duplicate access would not be designated (See Appendix B). Figure 3 identifies all trails designated as open to ORV use under this alternative.

This alternative would authorize ORV use on 2.22 miles of existing trails. ORV use off designated trails would be prohibited. Designated trails would be open to ORV use for any purpose. The designation of ORV trails would be authorized through special regulations in accordance with 36 CFR 4.10.

As a condition of the woodcutting permit, the NPS would establish a 25-foot buffer on each side of all primary (main) trails (see Figure 3) where cutting standing timber would not be allowed (timber gathering and other subsistence activities could still occur within the buffer).

The NPS would delineate open trails on the ground and would post those trails not opened with obvious markings identifying them as closed to ORV use.

Generally each designated trail should be inspected and receive some basic annual maintenance. Existing trails are in good to fair condition so maintenance would be expected to be minimal. Closed trails would be allowed to revegetate naturally.

Mitigation

Cultural Resources

The project area will be surveyed for cultural resources. If any are identified they will be evaluated for eligibility to the National Register of Historic Places and if necessary trails would be rerouted to assure that no historic properties are adversely affected.

If cultural resources are discovered during trail maintenance activities, work would be halted at the discovery site, the discovery would be protected and the Lake Clark Superintendent or Chief of Cultural Resources would be notified. The site would be evaluated for eligibility for the National Register of Historic Places. Appropriate action would be taken to avoid adverse effects to any eligible cultural properties.

Environmentally Preferred Alternative

The Environmentally Preferred Alternative is the alternative that will promote the national environmental policy expressed in the NEPA section 101(b) of the NPS DO-12 Handbook and Director's Order (NPS, 2005a). The Environmentally Preferred Alternative is the action which results in the least damage to the biological resources and environment while protecting, preserving, and enhancing the historic, cultural, and natural resources.

Alternative 3 is the Environmentally Preferred Alternative. It would provide more environmental protection than Alternative 1 because it would designate fewer miles of trail for ORV use and allow more acreage to revegetate naturally. While Alternative 2 would create less impact to vegetation and soils than Alternative 1, the woodcutting buffer described in Alternative 3 would also create less impact to vegetation than Alternative 1 and would provide the greatest protection of scenic values.

Alternatives and Actions Considered but Eliminated from Further Consideration

Several alternatives were considered during the public and agency scoping process but were eliminated from further evaluation in this EA. This section describes the alternatives and actions that were considered and provides justification for their elimination.

1. Designate trails only for ORV use in support of subsistence activities.

From a practical standpoint, it is difficult to distinguish between uses for subsistence purposes and other uses, such as recreation. Therefore, the NPS proposes to designate ORV trails for all users.

2. Designate the Port Alsworth woodlot areas as open to ORV use.

Opening the entire area would allow ORV use on all existing trails and all off-trail areas within the woodlots. This would provide access to timber resources but would not fulfill the specific project purpose (see Purpose and Need section), specifically protecting park resources. Existing use has created a network of ORV trails and has damaged vegetation and aesthetic qualities of the area. Such a designation could lead to impairment of park resources.

3. Close the Port Alsworth woodlots to all motorized use.

Closing the woodlots to motorized use would protect park resources but it would not fulfill the specific project purpose (see Purpose and Need section), specifically providing reasonable access to timber resources. While residents could retrieve timber by snowmachine, on foot, or by other nonmotorized means, the use of ORVs to access the woodlots has been ongoing for some time and there are a number of residents who spend a portion of the winter in the area.

4. Construct new trails in the Port Alsworth woodlots for ORV use.

Residents have been accessing the woodlots since the late 1800s. They have established trails to access timber resources. NPS does not believe it is necessary to construct additional trails.

5. Manage all existing trails for continued ORV use.

This action would require maintaining or improving all of the existing ORV trails in the woodlots. This action was dismissed because many of these trails are duplicative, or are unnecessarily impacting aesthetic resources.

6. Designate trails or areas for ORV use outside the Port Alsworth woodlots.

This action was dismissed because it is outside the scope of this project which is to manage ORV use in the Port Alsworth woodlots.

Table 1: Summary of Impacts of Alternatives

Impact Topic	Alternative 1 (No Action Alternative)	Alternative 2	Alternative 3 (NPS Preferred Alternative)
Subsistence Firewood Harvest	Minor Adverse: Residents continue to have similar opportunities as they do now, but the NPS may need to restrict ORV use to prevent resource damage.	Minor to Moderate Adverse: Residents would continue to have similar opportunities as they do now. Trails would be marked & maintained; however, residents would spend additional time & effort to access timber resources.	Minor Adverse: Residents would continue to have similar opportunities as they do now. Trails would be marked & maintained; however, residents may need to spend additional time & effort to access timber resources.
Vegetation & Soils	Minor to Moderate Adverse: ORV use would suppress re-vegetation on 3.51 miles of existing trails.	Minor Adverse: ORV use would suppress re-vegetation on 1.54 miles of existing trails.	Minor Adverse: ORV use would suppress re-vegetation on 2.22 miles of existing trails.
Natural, Aesthetic, and Scenic Values	Moderate Adverse: These values would be degraded by a network of ORV trails.	Minor Adverse: These values would be degraded by 1.54 miles of ORV trails.	Minor Adverse: These values would be degraded by 2.22 miles of ORV trails but would benefit from a wood-cutting buffer

AFFECTED ENVIRONMENT

Existing Trails

A trail condition assessment (NPS 2006) was conducted in 2006 on Port Alsworth area trails. This assessment is incorporated by reference. The assessment was conducted on trails within the project area and on some trails adjacent to the project area (see trail condition map in Appendix D). The following table shows that the trail condition assessment characterizes most existing ORV trail segments in the Port Alsworth area as fair or good, with a few segments characterized as degraded.

Miles	Condition Class
3.1	Good
2.7	Fair
0.3	Degraded
0.0	Very Degraded
0.0	Extremely Degraded

Subsistence Firewood Harvest

Local rural residents engage in, and depend upon, resources from the park for personal consumption, cultural identity, and to maintain a subsistence way of life.

Johnson (1998) reported that Port Alsworth residents regularly harvest white spruce, birch, and cottonwood in the Port Alsworth area, and more than six species of berries within a half-mile of town. Johnson (1998) reported that fifteen Port Alsworth households use fuel wood for some purpose: twelve use wood to heat or partially heat their homes, two use wood to heat a cabin in the area, four use wood for a steam bath, five use wood for cooking, and six use wood in a smoke house. The total amount of fuel wood utilized per household varies from 0.1 to 11 cords (Johnson 1998). Five respondents stated that there are too many people competing for wood resources in Port Alsworth.

Behnke (1977) writes that, “In terms of replacement value ... the use of spruce and birch for construction and firewood is extremely important economically, since the high cost of transporting lumber and stove-oil put them almost out of the reach of people living the life-style that many do in this area. Without the use of subsistence resources many people could not continue to live in the area, or would be able to do so only at a much lower standard of living.”

Behnke (1977) also states that many social relations revolve around resource harvest activities. It allows multiple generations to participate and enables the passing on of traditional skills and knowledge, helps maintain social and cultural ties, and provides a sense of individualism and self-sufficiency.

Vegetation and Soils

The main woodcutting area in the northern part of the project area is approximately 15 acres and the woodcutting area in the southern part of the project area is approximately 36 acres. The southern portion contains two vegetative communities, a cottonwood and spruce dominated riparian area of overflow drainage channels near the Tanalian River, and a slightly higher terrace to the northeast dominated by spruce and birch. Scattered large spruce grow throughout both types. This area was logged for large spruce during the 1940s (NPS 1999).

The riparian area in the southern portion of the project area has large cottonwood and spruce with numerous spruce and cottonwood seedlings and saplings. Many of the cottonwoods are over mature with dead or damaged tops and rotten centers. Alder are found throughout this part of the woodlot, often over 25-30 feet high. Understory consists of smaller alder, scattered willows, and cottonwood and spruce seedlings, with high bush cranberry, rose and ferns. Ground cover is dominated by litter with scattered grass, forbs and mosses.

The higher terrace area is dominated by young spruce and birch saplings, with occasional large old spruce and birch. A light understory of alder, high bush cranberry and ferns grows under the saplings, with a ground cover of labrador tea, lowbush cranberry and mosses.

The northern portion of the project area resembles a manicured park land with widely spaced spruce and birch up to 90 years old. Understory is scattered highbush cranberry and alder, with ground cover of Labrador tea and lowbush cranberry. The east and west edges of the woodlot are respectively Dry Creek and the Tanalian River, with dense cottonwoods, large spruce and birch near the drainages.

Natural, Aesthetic, and Scenic Values

The woodlots are relatively small areas that have been harvested for decades so their natural qualities have been diminished. Timber cutting has occurred adjacent to ORV trails creating clear cut swaths. Much of the northern portion of the project area resembles a manicured park land. Still, the quality of the scenery is high enough to afford good opportunities for residents and visitors to enjoy this part of the park and experience natural sights, sounds, and smells. The woodlot trails also serve as one of the access trails to the hiking trail system to Tanalian Mountain, Tanalian Falls, and Kontrashibuna Lake.

ENVIRONMENTAL CONSEQUENCES

Impacts identified for each issue are based on the intensity, duration, and extent of the impact. Summary impact levels are characterized as negligible, minor, moderate, or major. Impact level thresholds are defined in Table 2.

The following analysis evaluates environmental impacts from the three alternatives considered in this EA. There are no past, present, or reasonably foreseeable actions that would affect subsistence timber harvest, vegetation and soils, or natural, aesthetic and scenic values.

Table 2. Impact Levels

Negligible	Minor	Moderate	Major
Little or no impact to the resource would occur; any change that might occur may be perceptible but difficult to measure.	Change in a resource would occur, but no substantial impact would result. The change would be perceptible & measurable but not alter resource condition.	Noticeable & measurable change in a resource would occur & would alter resource condition, but the integrity of the resource would remain.	Substantial impact to a resource would occur that is easily defined, highly noticeable, & would measurably alter the integrity of the resource.

Alternative 1 (No Action Alternative)

Under the No Action Alternative local residents would continue to access the Port Alsworth area woodlots to harvest and gather timber resources, especially when Lake Clark doesn't

freeze and/or there is not adequate snowcover to use snowmachines to get to more distant timber resources. Residents would continue to use ORVs on all existing trails.

Effects on Subsistence Timber Harvest

Local residents would continue to use ORVs to access timber resources as they have in the past so residents would continue to obtain timber resources for a while though current harvest levels are not sustainable (NPS 1999). Residents would spend about the same amount of time and effort to harvest timber as they do now. Social relationships, such as the opportunity for children to learn harvest techniques from elders, would not be affected by this alternative. The sense of individualism and self-sufficiency that is often associated with subsistence activities would not be affected by actions in this alternative.

Residents would continue to have opportunities to harvest timber resources and would not spend additional money on construction or fuel sources as a result of this alternative.

However, because these trails would not be designated, trails and areas may be subject to closures or restrictions of ORVs if use degrades park resource values. The trails would not be considered a significant park asset so funding for maintenance would be difficult to acquire.

Effects on Vegetation and Soils

Existing trails in the woodlots primarily occur on areas containing a gravel substrate and are predominately well or moderately well drained. There is considerable evidence of new trails that have been created with only a couple passes of an ORV. Continued ORV use throughout the woodlots, particularly off-trail use, would damage vegetation and compact soils. Continued use of all existing main and secondary trails would continue to suppress re-vegetation on trails in a small area (3.51 miles of trails in approximately 51 acres).

Effects on Natural, Aesthetic, and Scenic Values

The trails in the woodlots are primarily used by local residents for recreation and subsistence woodcutting; however, park visitors occasionally use the main trail on the Port Alsworth side of the Tanalian River for an easy walk in the woods or to access the Kontrash Trail, a footpath that connects with the trail to Tanalian Falls. The likelihood of visitors encountering local residents riding ORVs while walking on the main trail is high and some may be inconvenienced or annoyed by sharing the trail with motorized vehicles or by ORV noise and emissions.

By their very nature, webs of ORV trails and use of ORVs diminish the natural, aesthetic, and scenic value of the woodlots. Continuing the existence of a high density of trails, and continued formation of new trails, would continue to degrade the natural, aesthetic, and scenic values of this part of the park and would degrade the aesthetic value of the Kontrash Trail because visitors can see existing ORV trails from the Kontrash Trail.

Cumulative Impacts

Noise caused by use of the two Port Alsworth airstrips, which are located in close proximity to the project area, would continue to degrade natural soundscapes and consequently, the natural values of the woodlot and the associated hiking experience. Continued woodcutting in the woodlots would result in the removal of trees which would also degrade natural and scenic values of the area. These ongoing actions would have a minor to moderate adverse impact on natural values in the woodlot. The actions in this alternative would contribute moderate adverse impacts as these values would be degraded by a network of ORV trails and subsequent wood-cutting. The cumulative impact of this alternative plus noise from the airstrips would be moderate as impacts would not alter the integrity of the resource. This alternative would be partially responsible for the adverse impacts.

Conclusion

On balance, this alternative would have a minor adverse impact to subsistence timber harvest activities because residents would continue to have similar opportunities as they do now, but the NPS may need to close trails or areas to the use of ORVs to prevent resource damage. This alternative would have a minor to moderate adverse impact to vegetation and soils since continued ORV use would suppress re-vegetation on trails. It would have a moderate negative impact on natural, aesthetic, and scenic values as these values would be degraded by the existing network of ORV trails.

The impact from this alternative to vegetation and soils, and natural, aesthetic, and scenic values would not result in an impairment of park resources that fulfill specific purposes identified in legislation establishing the park or key to the natural or cultural integrity of the park.

Alternative 2 (Designate Primary Trails for ORV Use)

Under this alternative NPS would designate most of the main trails in the Port Alsworth woodlots as open. It would not open most secondary, or rarely used, trails.

Effects on Subsistence Firewood Harvest

Local residents would continue to have opportunities to obtain timber resources. Social relationships, such as the opportunity for children to learn harvest techniques from elders, would not be affected by this alternative. The sense of individualism and self-sufficiency that is often associated with subsistence activities would not be affected by actions in this alternative.

Residents would continue to have opportunities to harvest timber resources and would not spend additional money on construction or fuel sources as a result of this alternative.

Residents would spend additional time and effort to harvest timber because ORVs would be authorized on 1.54 miles (44%) of the 3.51 miles of trails currently in use. Since residents

would be authorized to operate ORVs on less than half the trails they currently use, residents may spend additional effort to access timber resources, requiring them to walk farther to harvest timber.

On the other hand, this alternative would establish open trails as a park asset, which would make them more competitive for funding for trail maintenance. Improved condition of trails would create a small beneficial impact because the trails would be easier to drive on.

Effects on Vegetation and Soils

Trails designated under this alternative primarily occur on a gravel substrate and are predominately well or moderately well drained. Closed trails would be allowed to revegetate. Because no additional trails would be developed and use would be limited to 1.54 miles of trails, impacts to vegetation and soils would be minimal.

Effects on Natural, Aesthetic, and Scenic Values

The trails in the woodlots are primarily used by local residents for recreation and subsistence woodcutting; however park visitors occasionally use the main trail on the Port Alsworth side of the Tanalian River for an easy walk in the woods or to access the Kontrash Trail, a footpath that connects with the trail to Tanalian Falls. The likelihood of visitors encountering local residents riding ORVs while walking on the main trail is high and some may be inconvenienced or annoyed by sharing the trail with motorized vehicles or by ORV noise and emissions.

By their very nature, webs of ORV trails and use of ORVs diminish the natural, aesthetic, and scenic value of the woodlots. Designating only main trails for ORV use would greatly improve the natural, aesthetic, and scenic values of the area by allowing secondary trails to revegetate and by stopping a proliferation of new trails. Limiting new trail formation would improve the natural, scenic, and aesthetic values of the Kontrash Trail.

Cumulative Impacts

Noise caused by use of the two Port Alsworth airstrips, which are located in close proximity to the project area, would continue to degrade natural soundscapes and consequently, the natural values of the woodlot and the associated hiking experience. Continued woodcutting in the woodlots would result in the removal of trees which would also degrade natural and scenic values of the area. These ongoing actions would have a minor to moderate adverse impact on natural values in the woodlot. The actions in this alternative would have a minor adverse impact on natural, aesthetic, and scenic values. The cumulative impact of this alternative plus continued woodcutting and noise associated with the airstrips would be moderate. This alternative would be partially responsible for the impacts.

Conclusion

On balance, this alternative would have a minor to moderate adverse impact to subsistence timber harvest activities because residents would continue to have similar opportunities as they do now, and trails would be marked and maintained; however, residents would spend additional time and effort to access timber resources. This alternative would have a minor adverse impact to vegetation and soils since ORV use would be allowed on 1.54 miles of trails. There would be a minor adverse impact to natural, scenic and aesthetic values since 1.54 miles of trails of ORV trails would exist in the project area. However, this would be a reduction in impacts to natural, scenic and aesthetic values as compared with the No Action alternative. This alternative would benefit these values since secondary trails would revegetate.

The impact from this alternative to vegetation and soils, and natural, aesthetic, and scenic values would not result in an impairment of park resources that fulfill specific purposes identified in legislation establishing the park or key to the natural or cultural integrity of the park.

Alternative 3 (NPS Preferred Alternative)

Under this alternative NPS would designate all of the main trails and many of the secondary trails in the Port Alsworth woodlots as open. Residents would not be permitted to cut standing timber within 25-feet of all main trails.

Effects on Subsistence Firewood Harvest

Local residents would continue to have opportunities to obtain timber resources. Social relationships, such as the opportunity for children to learn harvest techniques from elders, would not be affected by this alternative. The sense of individualism and self-sufficiency that is often associated with subsistence activities would not be affected by actions in this alternative.

Residents would continue to have opportunities to harvest timber resources and would not spend additional money on construction or fuel sources as a result of this alternative.

Residents would spend a minimal amount of additional time and effort to harvest timber because ORVs would be authorized on 2.22 miles (63%) of the 3.51 miles of trails currently in use. Since residents would be authorized to use ORVs on fewer miles of trails, and they would not be allowed to cut wood within 25 feet of a trail, they may need to spend additional time and effort to access timber resources. They would need to walk beyond the 25 foot buffer to cut timber. However, they would continue to gather downed timber within the buffer. While the amount of open trails is reduced in this alternative compared to Alternative 1 (No Action Alternative), this alternative provides access to areas similar to alternative 1; it provides access without opening duplicative routes.

This alternative would establish open trails as a park asset, which would make them more competitive for funding for trail maintenance. Improved condition of trails would create a

small beneficial impact to access. Identifying and maintaining trails, especially secondary trails, for ORV use would enhance access to timber resources.

Effects on Vegetation and Soils

Trails open under this alternative primarily occur on a gravel substrate and are predominately well or moderately well drained. Closed trails would be allowed to revegetate. Because no additional trails would be developed and use would be limited to 2.22 miles of trails, impacts to vegetation and soils would be minimal.

Effects on Natural, Aesthetic, and Scenic Values

The trails being considered in this alternative are primarily used by local residents for recreation and subsistence woodcutting; however park visitors occasionally use the main trail on the Port Alsworth side of the Tanalian River for an easy walk in the woods or to access the Kontrash Trail, a footpath that connects with the trail to Tanalian Falls. The likelihood of visitors encountering local residents riding ORVs while walking on the main trail is high and some may be inconvenienced or annoyed by sharing the trail with motorized vehicles or by ORV noise and emissions.

By their very nature, webs of ORV trails and use of ORVs diminish the natural, aesthetic, and scenic value of the woodlots. Designating a limited number of trails for ORV use and creating a 25 foot wood-cutting buffer would greatly improve the natural, aesthetic, and scenic values of the area by allowing secondary trails to revegetate, stopping a proliferation of new trails, and by preventing a clear-cut corridor along the trails. Limiting new trail formation would improve the natural, scenic, and aesthetic values of the Kontrash Trail.

Cumulative Impacts

Noise caused by use of the two Port Alsworth airstrips, which are located in close proximity to the project area, would continue to degrade natural soundscapes and consequently, the natural values of the woodlot and the associated hiking experience. Continued woodcutting in the woodlots would result in the removal of trees which would also degrade natural and scenic values of the area. These ongoing actions would have a minor to moderate adverse impact on natural values in the woodlot. The actions in this alternative would have a minor adverse impact on natural, aesthetic, and scenic values since 2.22 miles of ORV trails would degrade those values. The cumulative impact of this alternative plus continued woodcutting and noise associated with the airstrips would be moderate. This alternative would be partially responsible for the impacts.

Conclusion

On balance, this alternative would have a minor adverse impact to subsistence timber harvest activities because residents would continue to have similar opportunities as they do now, and trails would be marked and maintained; however, residents may need to spend additional time and effort to access timber resources. This alternative would have a minor adverse impact to

vegetation and soils since ORV use would be authorized on 2.22 miles of trails. It would have a minor adverse impact on natural, aesthetic, and scenic values since 2.22 miles of ORV trails would degrade those values. However, this would be a reduction in impacts to natural, scenic and aesthetic values as compared with the No Action alternative. This alternative would benefit these values since some secondary trails would revegetate and a wood-cutting buffer would enhance the scenic quality of the trails.

The impact under this alternative to vegetation and soils, and natural, aesthetic, and scenic values would not result in an impairment of park resources that fulfill specific purposes identified in legislation establishing the park or key to the natural or cultural integrity of the park.

BIBLIOGRAPHY

Behnke, Steven R. 1977. *Resident resource use in the vicinity of the proposed Lake Clark National Park, Alaska*. Fairbanks, Alaska: University of Alaska.

Johnson, Darryll R., Eugene Hunn, Priscilla Russell, Mark Vande Kamp, Edmund Searles. September 1998. *Subsistence Uses of Vegetal Resources in and around Lake Clark National Park and Preserve*. Technical Report NPS/CCSOUW/NRTR-98-16 NPS D-19. University of Washington Field Station, Seattle, Washington.

National Park Service. 1999. *Port Alsworth Woodlot Evaluation, Lake Clark National Park and Preserve*. On File at National Park Service Alaska Regional Office, Anchorage, Alaska.

National Park Service. 2006. *Trail Condition Assessment for LACL Port Alsworth OHV Trails*. On File at Alaska Regional Office, Anchorage, AK.

CONSULTATION AND COORDINATION

Public Involvement

During the development of this document, NPS consulted with the State of Alaska, the Subsistence Resource Commission in Port Alsworth, and the Port Alsworth Improvement Corporation.

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Appendix A

ANILCA SECTION 810(A) Summary of Evaluations and Findings Management of Off-Road Vehicles near Port Alsworth Lake Clark National Park and Preserve

I. Introduction

This evaluation was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It summarizes the evaluation of potential restrictions to subsistence activities that could result from designating existing trails for ORV use in the woodlots near Port Alsworth.

Lake Clark National Park and Preserve proposes to designate existing trails for ORV use in areas currently used to collect firewood near Port Alsworth. This action is being considered to manage ORV use in this area to minimize adverse impacts to the resources and values for which the park was established while providing reasonable access to subsistence firewood resources. Subsistence firewood gathering is allowed and firewood cutting is permitted by NPS regulations (36 CFR 13.485). Currently no trails or routes have been designated for general travel purposes in the Port Alsworth area.

II. Lake Clark National Park and Preserve

The purposes for which Lake Clark National Park and Preserve (LACL) were created are found in the language of the 1980 Alaska National Interest Lands Conservation Act (ANILCA, Pub. L. 96-487). As a unit of the National Park System, Lake Clark National Park and Preserve shall be administered to:

- protect the watershed necessary for the perpetuation of the red salmon fishery in Bristol Bay;
- maintain unimpaired the scenic beauty and quality of portions of the Alaska Range and Aleutian Range, including active volcanoes, glaciers, wild rivers, lakes, waterfalls, and alpine meadows in their natural state; and
- protect habitat for and populations of fish and wildlife including but not limited to caribou, Dall sheep, brown/grizzly bears, bald eagles, and peregrine falcons.

III. The Evaluation Process

Section 810(a) of ANILCA states: “In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands . . . the head of the Federal agency . . . over such lands . . . shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. No such withdrawal, reservation, lease, permit, or

other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be affected until the head of such Federal agency:

1. gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to Section 805;
2. gives notice of, and holds, a hearing in the vicinity of the area involved; and
3. determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity would involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps would be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions."

IV. Proposed Action on Federal Land

Lake Clark National Park and Preserve proposes to designate existing trails for ORV use in areas currently used to collect firewood near Port Alsworth. The Description of Alternatives section of the EA describes each alternative considered in detail. The following is a brief summary of each alternative.

Under the No Action Alternative local residents would continue to access the Port Alsworth area woodlots to harvest and gather timber resources, especially when Lake Clark doesn't freeze and/or there is not adequate snowcover to use snowmachines to get to more distant timber resources. Residents would continue to use ORVs on all existing trails.

Under Alternative 2 NPS would designate most of the main trails in the Port Alsworth woodlots as open. It would not open most secondary, or rarely used, trails.

The proposed action is presented as Alternative 3. This alternative would designate all of the main trails and many of the secondary trails in the Port Alsworth woodlots as open to ORV use. A condition of the woodcutting permit would stipulate that residents would not be permitted to cut trees within 25 feet of all main trails.

V. The Affected Environment Relative to Subsistence Use

Between 1898 and 1910 the first prospectors arrived to camp near the mouth of the Tanalian River in conjunction with copper mining on Kontrashibuna Lake. They began cutting spruce and birch for firewood. Between 1910 and 1912 the Tanalian Point settlement was established by O.M. Dutton, J.E. Kackley, and J.W. Walker. They were joined by the Trefon Balluta family from Telaquana and Kijik. House logs and firewood cutting around the Tanalian River ran through 1932-1933 when Charlie Denison and his son Floyd arrived and began cutting trees on the south side of the Tanalian River. In 1934-1935 Charlie Denison established the first sawmill in Lake Clark – Iliamna Country; he primarily cut white spruce. Many people from Nondalton assisted the Denisons in cutting spruce on both sides of the Tanalian River. The zenith of the sawmill cutting occurred in the late 1930s into the early 1960s.

Babe and Mary Alsworth arrived in 1944 and built a runway and framed buildings. Until now people used dog teams to transport timber. By 1945-1946 the Alsworths were using a Ford

tractor and a D-4 Cat to transport timber as they began operating the second sawmill at Tanalian Point-Port Alsworth. They cut birch and spruce logs on the north side of the Tanalian River through the late 1970s. The Alsworths last cut sawlogs on the south side of the Tanalian River during the winter of 1976-1977.

Local rural residents continue to engage in, and depend upon, resources from the park for personal consumption, cultural identity, and to maintain a subsistence way of life.

In accordance with regulations in 36 CFR Part 13, residents of the NPS designated resident zone communities of Iliamna, Lime Village, Newhalen, Nondalton, Pedro Bay and Port Alsworth and people who reside inside the boundaries of the park are qualified to engage in subsistence activities in Lake Clark National Park and Preserve. Local rural residents who do not live in these communities or in the park, but who have customarily and traditionally engaged in subsistence activities within the park may continue to do so with a subsistence use permit issued by the park superintendent.

Johnson (1998) reported that Port Alsworth residents regularly harvest white spruce, birch, and cottonwood in the Port Alsworth area, and more than six species of berries within a half-mile of town. Johnson (1998) reported that fifteen Port Alsworth households use fuel wood for some purpose: twelve use wood to heat or partially heat their homes, two use wood to heat a cabin in the area, four use wood for a steam bath, five use wood for cooking, and six use wood in a smoke house. The total amount of fuel wood utilized per household varies from 0.1 to 11 cords (Johnson 1998).

VI. Subsistence Uses and Needs Evaluation

To determine the potential impacts on subsistence activities from designating existing trails for ORV use, three evaluation criteria were analyzed relative to existing subsistence resources:

1. The potential to reduce subsistence fish and wildlife populations by (a) reductions in number, (b) redistribution of subsistence resources, or (c) habitat losses;
2. The potential effect on subsistence fisher or hunter access;
3. The potential to increase fisher or hunter competition for subsistence resources.

1. The potential to reduce populations

In all alternatives considered in this analysis, there is minimal potential to reduce numbers of or redistribute fish and wildlife populations, or reduce habitat for subsistence fish and wildlife populations because the approximately 51 acre project area is not presently used for subsistence hunting, fishing, or trapping.

2. Restriction of Access

Alternative 1 (No Action Alternative). Local residents would be able to access timber resources as they have in the past so residents would spend about the same amount of time and effort accessing timber resources as they do now. However, because the trails would not be formally designated, trails and areas may be subject to closures or restrictions to ORV use if

ORV use degrades park resource values. The trails would not be considered a significant park asset so funding for maintenance would be difficult to acquire. Lack of maintenance could negatively affect the condition of these trails, which could adversely affect access to timber resources. On balance, this alternative is not expected to significantly restrict access to subsistence resources.

Alternative 2. Local residents would continue to have opportunities to access timber resources for subsistence use. This alternative would authorize 1.54 miles of the 3.51 miles of trails currently in use and reduce access to some timber harvesting areas. Limiting the number of trails may require residents to spend additional effort to access timber resources, requiring them to walk farther from the trail to harvest timber.

In contrast to the status quo, Alternative 2 would formally establish open trails as a park asset, which would make them more competitive for funding for trail maintenance. Identifying and maintaining trails for ORV use and improving trail conditions would enhance access to timber resources. On balance, this alternative is not expected to significantly restrict access to subsistence resources.

Alternative 3 (NPS Preferred Alternative). Local residents would continue to have opportunities to access timber resources to sustain their way of life. This alternative would authorize 2.22 miles of the 3.51 miles of trails currently in use and implement a 25-foot buffer where woodcutting is not allowed. Alternative 3 would provide adequate access to timber harvesting areas and help disperse woodcutting activities. Restricting ORV use to designated trails and creating a 25-foot buffer along main trail corridors may make it more difficult for residents to access timber resources and require them to walk beyond 25 feet to harvest timber.

As in Alternative 2, Alternative 3 would formally establish open trails as a park asset, which would make them more competitive for funding for trail maintenance. Identifying and maintaining trails for ORV use and improving trail conditions would enhance access to timber resources. On balance, this alternative is not expected to significantly restrict access to subsistence resources.

3. Increase in Competition

The overall potential for increased competition between resource users is minimal in all three alternatives because the total number of subsistence firewood harvesters would not be likely to increase because of any actions described in this environmental assessment.

VII. Availability of Other Lands

This document addresses designating existing trails for ORV use near Port Alsworth, not creating new or alternative trails or routes. ORVs can be used throughout the year to transport residents to woodcutting areas adjacent to Port Alsworth and access timber resources for firewood.

VIII. Alternatives Considered

This analysis has evaluated three alternatives: Alternative 1, to maintain the status quo; Alternative 2, to designate the most common trails used by local residents to access woodcutting areas adjacent to Port Alsworth; and Alternative 3, to designate the most common trails as well as some secondary trails currently used by local residents to access woodcutting areas adjacent to Port Alsworth.

IX. Findings

This analysis concludes that the proposed action as described in Alternative 3 would not result in a significant restriction of subsistence uses.

Appendix B

Criteria for Designating Existing ORV Trails in Alternatives 2 and 3

Existing ORV trails in the Port Alsworth area were evaluated against a set of criteria to determine which trails would be designated for ORV use under Alternative 2 and Alternative 3. The evaluation criteria are as follows:

Criteria A: Primary trails (used regularly) that provide access to viable woodcutting areas on NPS land.

Criteria B: Secondary (less used) trails that provide access to viable woodcutting areas on NPS land.

Criteria C: Trails that provide access to overharvested woodcutting areas or that duplicate access.

Alternative 2 designated trails that met Criteria A. Alternative 3 designated trails that met Criteria A and B. Neither alternative incorporated trails that met Criteria C.

The goal was to provide a range of alternatives, both of which balance access opportunities with resource protection. Alternative 2 achieves this goal by providing reasonable access opportunities with no vegetative buffer. Alternative 3 achieves the goal by providing additional access opportunities (compared to Alternative 2) but with a vegetative buffer to encourage dispersed woodcutting which would better protect park resource values.

Appendix C

Negative Determination for the Management of Off-Road Vehicles Near Port Alsworth Lake Clark National Preserve

The State of Alaska has an approved coastal zone management program, the Alaska Coastal Management Program (ACMP) which includes regulations in Title 11, Chapter 112 of the Alaska Administrative Code (11 AAC 112). The Alaska Department of Natural Resource's Office of Project Management & Permitting (OPMP) coordinates review of federal consistency determinations as per 11 AAC 110. The Alaska Coastal Policy Council promulgates standards in the ACMP in chapter 112 of Title 11 (11 ACC 112). CZMA Federal Consistency Regulations (15 CFR 930.35(b)) state that negative determinations include an evaluation of the relevant policies set forth in the ACMP and applicable district programs.

The National Park Service (NPS) is proposing a management plan for off-road vehicles (ORVs) near Port Alsworth for Lake Clark National Preserve (T. 1. N., R. 29. W.). Lands in the project area fall within the coastal zone of the State of Alaska and the Lake and Peninsula Borough (ACMP "Coastal Zone Boundaries of Alaska" Map #57 for Lake Clark). The project area is federal land managed by the National Park Service and by definition is outside the state's coastal zone.

This project would authorize and regulate the use of off-road vehicles on specific trails in the Port Alsworth area of the Preserve in support of woodcutting and other purposes while minimizing damage to Preserve resources and values. The designation of ORV trails would occur through special regulations.

A detailed description of the Lake Clark National Preserve Management of Off-Road Vehicles near Port Alsworth Plan is provided in the attached environmental assessment. Alternative 3 is the NPS preferred alternative.

The following section details the NPS's Negative Determination analysis by which it was determined that the Off-Road Vehicle Use Plan would not effect any coastal use or resource. In determining effects, the NPS followed 15 CFR 930.33(a)(1) and has included an evaluation of the relevant enforceable policies of the ACMP and the Lake and Peninsula Borough District. State standards included for analysis are coastal development; coastal access; timber harvest; subsistence; habitats; air, land, and water quality; and historic, prehistoric, and archaeological resources. The project would be located on lands under federal jurisdiction, which are outside the coastal zone.

11 A.A.C. 112.200. Coastal development Standard

- (a) In planning for and approving development in or adjacent to coastal waters, districts and state agencies shall manage coastal land and water uses in such a manner that those uses that are economically or physically dependent on a coastal location are given higher priority when compared to uses that do not economically or physically require a coastal

location.

- (b) District and state agencies shall give, in the following order, priority to
 - (1) water-dependent uses and activities;
 - (2) water-related uses and activities; and
 - (3) uses and activities which are neither water-dependent nor water-related for which there is no practicable inland alternative to meet the public need for the use or activity.
- (c) The placement of structures and the discharge of dredged or fill material into coastal water must, at a minimum, comply with the standards contained in **33 C.F.R. Parts 320-323**, revised as of July 1, 2003.

Analysis: The NPS Preferred Alternative (Alternative 3) would authorize ORV use on 2.22 miles (66%) of existing trails. No new trails would be developed. The designation of trails in the Port Alsworth area of Lake Clark National Preserve is not water-related but there is no inland alternative because the historic woodcutting areas and existing trails are located within the project area.

11 A.A.C. 112.220. Coastal access

Standard

District and state agencies shall ensure that projects maintain and, where appropriate, increase public access to, from, and along coastal water.

Analysis: Alternative 3 would authorize ORV use on 2.22 miles (66%) of existing trails. Designated trails would be open to ORV use for woodcutting and other purposes (i.e., recreation, subsistence, etc.). No facilities or structures would be build that would impede access to tidelands. Actions described in this plan would not affect public access to, from, and along coastal water.

11 AAC 112.250. Timber harvest and processing.

Standard

AS 41.17 (Forest Resources and Practices Act) and the regulations adopted under that chapter with respect to the harvest and processing of timber are incorporated into the program and constitute the components of the program with respect to those purposes.

Analysis: Alternative 3 would authorize ORV use on 2.22 miles (66%) of existing trails. Designated trails would be open to ORV use for woodcutting and other purposes (i.e., recreation, subsistence, etc.). In all alternatives local residents would continue to harvest timber in the Port Alsworth woodlots.

11 A.A.C. 112.270. Subsistence

Standard

- (a) A project within a subsistence use area designated by the department or under **11 A.A.C. 114.250(g)** must avoid or minimize impacts to subsistence uses of coastal resources.
- (b) For a project within a subsistence use area designated under **11 A.A.C. 114.250(g)**, the applicant shall submit an analysis or evaluation of reasonably foreseeable adverse impacts of the project on subsistence use as part of

- (1) a consistency review packet submitted under **11 A.A.C. 110.215**; and
 - (2) a consistency evaluation under **15 C.F.R. 930.39**, **15 C.F.R. 930.58**, or **15 C.F.R. 930.76**.
- (c) Repealed 10/29/2004, **Register 172**.
- (d) Except in nonsubsistence areas identified under **A.S. 16.05.258**, the department may, after consultation with the appropriate district, federally recognized Indian tribes, Native corporations, and other appropriate persons or groups, designate areas in which a subsistence use is an important use of coastal resources as demonstrated by local usage.
- (e) For purposes of this section, “federally recognized Indian tribe,” “local usage,” and “Native corporation” have the meanings given in **11 A.A.C. 114.990**.

Analysis: The Port Alsworth area is in Lake Clark National Preserve and is open to subsistence uses under ANILCA Title VIII. The NPS is responsible for managing subsistence in the Preserve. The NPS has prepared an ANILCA section 810 evaluation and has determined that the plan would not cause a significant restriction of subsistence uses.

11 A.A.C. 112.300. Habitats

Standard

- (a) Habitats in the coastal area which are subject to the program are
- (1) offshore areas;
 - (2) estuaries;
 - (3) wetlands;
 - (4) tideflats;
 - (5) rocky islands and seacliffs;
 - (6) barrier islands and lagoons;
 - (7) exposed high energy coasts;
 - (8) rivers, streams and lakes and the active floodplains and riparian management areas of those rivers, stream and lakes; and
 - (9) important habitat.
- (b) The following standards apply to the management of the habitats identified in (a) of this section:
- (1) offshore areas must be managed to avoid, minimize or mitigate significant adverse impacts to competing uses such as commercial, recreational or subsistence fishing, to the extent that those uses are determined to be in competition with the proposed use;
 - (2) estuaries must be managed to avoid, minimize or mitigate significant adverse impacts to
 - (A) adequate water flow and natural water circulation patterns; and
 - (B) competing uses such as commercial, recreational or subsistence fishing, to the extent that those uses are determined to be in competition with the proposed use;
 - (3) wetlands must be managed to avoid, minimize or mitigate significant adverse impacts to water flow and natural drainage patterns;
 - (4) tideflats must be managed to avoid, minimize or mitigate significant adverse impacts to
 - (A) water flow and natural drainage patterns; and

- (B) competing uses such as commercial, recreational or subsistence uses, to the extent that those uses are determined to be in competition with the proposed use;
 - (5) rocky islands and sea cliffs must be managed to
 - (A) avoid, minimize or mitigate significant adverse impacts to habitat used by coastal species; and
 - (B) avoid the introduction of competing or destructive species and predators;
 - (6) barrier islands and lagoons must be managed to avoid, minimize or mitigate significant impacts
 - (A) to flows of sediments and water;
 - (B) from the alteration or redirection of wave energy or marine currents that would lead to the filling in of lagoons or the erosion of barrier islands; and
 - (C) from activities that would decrease the use of barrier islands by coastal species, including polar bears and nesting birds;
 - (7) exposed high-energy coasts must be managed to avoid, minimize or mitigate significant adverse impacts
 - (A) to the mix and transport of sediments; and
 - (B) from redirection of transport processes and wave energy;
 - (8) rivers, streams and lakes must be managed to avoid, minimize or mitigate significant adverse impacts to
 - (A) natural water flow;
 - (B) active floodplains; and
 - (C) natural vegetation within riparian management areas; and
 - (9) important habitat
 - (A) designated under **11 A.A.C. 114.250(h)** must be managed for the special productivity of the habitat in accordance with district enforceable policies adopted under **11 A.A.C. 114.270(g)**; or
 - (B) identified under (c)(1)(B) or (C) of this section must be managed to avoid, minimize or mitigate significant adverse impacts to the special productivity of the habitat.
- (c) For purposes of this section,
- (1) “important habitat” means habitats listed in (a)(1)-(8) of this section and other habitat in the coastal area that are
 - (A) designated under **11 A.A.C. 114.250(h)**;
 - (B) identified by the department as a habitat
 - (i) the use of which has a direct and significant impact on coastal water; and
 - (ii) that is shown by written scientific evidence to be biologically and significantly productive; or
 - (C) identified as state game refuges, state game sanctuaries, state range areas or fish and game critical habitat under **A.S. 16.20**;
 - (2) “riparian management area” means the area along or around a waterbody within the following distances, measured from the outermost extent of the ordinary high water mark of the waterbody:
 - (A) for the braided portions of a river or stream, 500 feet on either side of the waterbody;

- (B) for split channel portions of a river or stream, 200 feet on either side of the waterbody;
- (C) for single channel portions of a river or stream, 100 feet on either side of the waterbody;
- (D) for a lake, 100 feet of the waterbody.

Analysis: The NPS Preferred Alternative (Alternative 3) would authorize ORV use on 2.22 miles (66%) of existing trails. No new trails would be developed. This would benefit wildlife habitat because 1.29 miles of existing trails would be allowed to re-vegetate. There are no stream crossings involved in this plan. The existing ORV trails are located on a gravel floodplain which is compatible with ORV use. There are virtually no wetlands or other habitat types in the project area.

11 A.A.C. 112.310. Air, Land & Water Quality Standard

Notwithstanding any other provision of this chapter, the statutes and regulations of the Department of Environmental Conservation with respect to the protection of air, land, and water quality, identified in **A.S. 46.40.040(b)** are incorporated into the program and, as administered by that department, constitute the exclusive components of the program with respect to those purposes.

Analysis: The NPS Preferred Alternative (Alternative 3) would authorize ORV use on 2.22 miles (66%) of existing trails. No new trails would be developed. No other lands would be affected. ORV operation would not affect air or water quality in the surrounding area. Exhaust emissions produced by ORVs used for subsistence firewood collection would have a negligible effect on the area's air quality because of low ORV use levels. About 15 families use the trails for firewood collection.

11 A.A.C. 112.320. Historic, Prehistoric, and Archeological Resources Standard

- (a) The department will designate areas of the coastal zone that are important to the study, understanding or illustration of national, state or local history or prehistory, including natural process.
- (b) A project within an area designated under (a) of this section shall comply with the applicable requirements of **A.S. 41.35.010 – 41.35.240** and **11 A.A.C. 16.010 – 11 A.A.C. 16.900**.

Analysis: The alternatives proposed in this plan will not expand disturbance into areas not already disturbed by ORV use. Cultural resources in the woodlot area are not likely to be affected by continued ORV use for the subsistence harvest of firewood. The project area will be surveyed for cultural resources. If any are identified they will be evaluated for eligibility to the National Register of Historic Places and if necessary trails would be rerouted to assure that no historic properties are adversely affected. If cultural resources are discovered during trail maintenance activities, work would be halted at the discovery site, the discovery would be protected and the Lake Clark Superintendent or Chief of Cultural Resources would be notified.

The site would be evaluated for eligibility for the National Register of Historic Places. Appropriate action would be taken to avoid adverse effects to any eligible cultural properties.

Enforceable Policies of the Lake and Peninsula Borough that apply to the Port Alsworth project are described below.

Coastal Development Policies

A-1 Water-Dependent and Water-Related Activities

A-2 Multiple Use

Analysis: *See analysis of 11 A.A.C. 112.200. Coastal development.*

Transportation, Coastal Access, and Utilities

E-1 Maintaining Traditional Coastal Access

Projects along coastal water shall include roads, waterways, trails, campsites, picnic sites, or marine anchorages whenever practicable to increase public access to coastal waters.

Analysis: *See analysis of 11 A.A.C. 112.220. Coastal access.*

NEGATIVE DETERMINATION: Based on the above information the National Park Service finds that the Lake Clark National Preserve Management of Off-Road Vehicles near Port Alsworth Plan would not have any effects on land or water resources in the State of Alaska's coastal zone.