

**National Park Service
U.S. Department of the Interior**

Wrangell-St. Elias National Park and Preserve, Alaska



Finding of No Significant Impact

Devils Mountain Lodge Airstrip Extensions Environmental Assessment

April 2012

Recommended:

Wayne Chalmer Acting 4-30-12
Superintendent, Wrangell-St. Elias National Park and Preserve Date

Approved:

[Signature] 5/3/12
Regional Director, Alaska Date

[Signature]

FINDING OF NO SIGNIFICANT IMPACT

Devils Mountain Lodge Airstrip Extensions Environmental Assessment

Wrangell-St. Elias National Park and Preserve, Alaska April 2012

The National Park Service (NPS) evaluated an SF-299 application submitted in 2011 by Kirk Ellis, acting as representative for the Ellis Family Homestead (EFH), to enlarge the family's privately-owned Devils Mountain Lodge Airstrip by extending each end onto adjacent park lands. These extensions would constitute new access facilities.

The EFH, which serves as a base for commercial air services and hunting concessions operated by Ellis family members, lacks sufficient length on private property to construct a longer airstrip. The existing airstrip is too short and has obstacles at both ends. Safe use of the current airstrip requires an unusually steep angle of ascent, which affects loading and limits cargo weights. Such conditions are problematic because they limit normal operations and pose avoidable risks. Only limited types of aircraft can now operate within the required parameters, so the existing airstrip is generally restricted to use by small high-performance aircraft.

The NPS utilizes the July 2007 "Interim User's Guide to Accessing Inholdings in National Park System Units in Alaska" and employ the criteria and processes articulated in Wrangell-St. Elias National Park and Preserve's (WRST) 2008 "Established and Maintainable Access to Inholdings Programmatic Plan and Environmental Assessment" to analyze and issue the Ellis family an Alaska National Interest Lands Conservation Act (ANILCA), Section 1110(b) Right-of-Way Certificate of Access (RWCA) for the resulting airstrip extensions.

The NPS has selected Alternative 2, the Preferred Alternative, to grant the Ellis Family the RWCA necessary to extend its existing airstrip at Devils Mountain Lodge at each end onto adjacent park lands. The RWCA contains specific mitigating measures to address unique resource protection needs.

Written comments were received from the State of Alaska, ANILCA Implementation Program; the Alaska Department of Transportation and Public Facilities; and four (4) local residents supporting the proposed action as described. These comments did not change the conclusions in the EA about the environmental effects of the action. NPS responses to substantive comments are provided in Attachment A.

ALTERNATIVES

This EA evaluated two alternatives.

No Action Alternative

Under the No Action Alternative, the NPS would not issue the Ellis family the RWCA necessary to extend the Devils Mountain Lodge Airstrip onto park lands. No facilities would be removed, modified, or constructed. Existing safety needs would not be addressed and would likely worsen over time as demand for the area's limited commercial aircraft services increases. Opportunities to expand access to federal lands and enhance services for park visitors would be limited.

Proposed Action Alternative: Devils Mountain Lodge Airstrip Extensions (NPS Proposed Action Alternative)

Under Alternative 2, the NPS would issue the Ellis Family the RWCA necessary to extend its existing airstrip on private lands at Devils Mountain Lodge at each end onto adjacent park lands.

The proposed improvements would include two constructed extensions to the Devils Mountain Lodge Airstrip, with one situated on park lands at each end and abutting the northern and southern boundaries of the EFH. These facilities would each be rectangular in shape and measure 600 feet long by 300 feet wide. Each would contain approximately 4.13 acres, with the pair totaling 8.26 acres. All of the proposed construction and maintenance activities analyzed by this environmental assessment (EA) would be confined to the EFH and these two new airstrip extension facilities.

The NPS would attach specific mitigating measures to the RWCA in order to address unique resource protection needs.

PUBLIC INVOLVEMENT

The Devils Mountain Lodge Airstrip Extensions Environmental Assessment was placed on the NPS Planning, Environment and Public Comment (PEPC) website on March 15, 2012, where it was available for public review and comment through April 15, 2012. Notice of the EA's availability was published in the *Copper River Record* and broadcast on KCHU radio in Valdez and KCAM radio in Glennallen, and was mailed to 35 interested individuals, organizations, and governmental agencies. Park staff also conducted informal discussions with several local landowners to brief them on the EA's contents and status.

Comments on the EA were received from the State of Alaska, ANILCA Implementation Program; the Alaska Department of Transportation and Public Facilities; and five (5) local residents. All responses either supported the proposal as proposed or requested clarification of specific points. The public comments received did not change the conclusions in the EA about the environmental effects of the action. The NPS responses to substantive public comments are found in Attachment A.

DECISION

The NPS decision is to select the Proposed Action Alternative: issue the Ellis Family the RWCA necessary to extend its existing privately-owned Devils Mountain Lodge Airstrip at each end onto adjacent park lands (NPS Proposed Action Alternative), along with the mitigating measures attached to the RWCA (Attachment B).

Mitigating Measures

The allowable uses and special stipulations, described in Exhibit A of the Devils Mountain Lodge Airstrip Extensions RWCA (Attachment B), are adopted as part of the selected alternative. These measures describe actions to avoid or reduce impacts to the area's hydrology, aquatic habitat and fish, water resources, native plants, and wildlife.

Rationale for the Decision

Alternative 2 will satisfy the purpose and need for action better than the no-action alternative. Enlarging the Ellis family's privately-owned Devils Mountain Lodge Airstrip will significantly reduce aviation-related hazards and improve visitor services. The runway extensions will (1) improve the margin of safety of aircraft operations, (2) enhance the ability to operate larger aircraft which will allow the Ellis family to modify their air fleet to provide a broader range of services, and (3) allow other agencies (NPS and State of Alaska) to base some critical flight operations at the airstrip.

Development of the airstrip extensions under Alternative 2 will result minor adverse effects on natural and cultural resources.

Significance Criteria

The preferred alternative will not have a significant effect on the human environment. This conclusion is based on the following examination the significance criteria defined in 40 CFR Section 1508.27.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

This decision will result in some negative impacts to visual resources, vegetation, soils, wildlife, and visitor experience, and some beneficial impacts to visitor services, and visitor experience, economic environment, park safety; and park operations. This action would not result in the impairment of any resources that fulfill specific purposes identified in the park's enabling legislation or that are key to its natural or cultural integrity.

(2) The degree to which the proposed action affects public health or safety.

This action will enhance the safety of local residents, visitors, park staff, and emergency responders by providing a safer facility from which to stage routine and emergency operations.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.

This action will not significantly impact any rare or unique resources or values.

(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

This action will not result in highly controversial effects on the quality of the human environment.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

This action is not known to include any unique or unknown risks or is likely to result in any highly uncertain impacts to the human environment.

(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.

Under the terms and conditions specified in this environmental assessment, this action would not establish a precedent for future actions with significant effects nor would it represent a decision in principle about any future consideration.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

This action is not related to any other actions possessing individually insignificant but cumulatively significant impacts.

(8) Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The RWCA issued as a result of this action will include specific protection measures to address unique resources. The degree or possibility that implementation of the selected alternative will cause loss or destruction of known scientific, cultural, or historic resources is extremely remote.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

No endangered or threatened species have been recorded in the project vicinity.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

This action complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988, 11900, and 12898. There will be no significant restriction of subsistence activities as documented by the ANILCA Title VIII, Section 810(a) summary evaluation and findings. No federal, state, or local laws or requirements imposed for the protection of the environment will be violated by implementing this action.

FINDINGS

The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park. However, it will reduce aviation hazards and enhance both commercial and visitor services. Granting the RWCA will be consistent with ANILCA 1110(b) access to inholdings provisions.

The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990 for floodplains and wetlands. There will be no restriction of subsistence activities, as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

The National Park Service has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.

ATTACHMENT A

NPS Responses to Public Comments For the Devils Mountain Lodge Airstrip Extensions Environmental Assessment

This attachment amends the subject environmental assessment (EA) and provides NPS responses to public comments.

NPS RESPONSE TO PUBLIC COMMENTS

Comments were received from the State of Alaska, ANILCA Implementation Program; the Alaska Department of Transportation and Public Facilities; and five (5) local residents. All responses either supported the proposal as proposed or requested further clarification of specific points.

The paraphrased questions and the NPS responses follow. These questions did not change the EA conclusions about the effects of the proposed action or other alternatives.

Public Question No. 1: How does the NPS propose to implement the Migratory Bird Act?

In order to protect nesting birds, no land clearing will be permitted between May 1 and July 15.

Public Question No. 2: How does the NPS propose to manage the disposal of the slash created by the action?

The Permittee must submit a plan for the Superintendent's approval prior to establishing burn piles. All burning on park land must be authorized by the Park Superintendent.

Public Question No. 3: How does the NPS propose to manage the distribution of the salvaged firewood?

Logs suitable for building materials or firewood will not be placed in burn piles or piled in clearing berms. Logs ≥ 6 " in diameter will be left on site and available for harvest by local residents. Wood must be stacked in log lengths, cleaned of soil or other debris. Park staff will notify local residents of its availability. Stumps less than three feet in length with root wads attached are not considered suitable.

ATTACHMENT B

Draft ANILCA 1110(b) Right-of-Way Certificate of Access (RWCA)

National Park Service Alaska Region 240 West 5th Avenue, Room 114 Anchorage, Alaska 99501	RWCA No.: 9865-12-001 Wrangell-St. Elias National Park and Preserve
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1. An ANILCA 1110(b) Right-of-Way Certificate of Access (hereinafter "RWCA") is hereby issued pursuant to Section 1110(b) of the Alaska National Interest Lands Conservation Act (ANILCA) of December 2, 1980 (16 USC 3170).

2. This RWCA provides access across National Park Service (hereinafter NPS) managed lands in Wrangell-St Elias National Preserve to the following non-federal land:

U.S. Survey 5535, Chitina Recording District, Third Judicial District, State of Alaska. Also identified as NPS tract WRST 10-113.

3. Nature of Interest:

a. By this instrument the Ellis Family Homestead, an Alaska Limited Partnership (hereinafter "Holder"), whose address is HC63 Box 1402, Gakona, Alaska, 99586, receives a right to construct, operate, use, maintain, and terminate two airstrip extensions on NPS managed lands in Wrangell-St. Elias National Preserve and within an area described as follows:

Bearings are not used because the bearings given in U. S. Survey 5535 are not accurate. All corners are right angles.

Northern Extension:

Commencing at corner number 3 U. S. Survey 5535, thence westerly, 15 feet, along the northern boundary of U.S. Survey 5535 to the point of beginning, thence westerly, 300 feet, along the northern boundary of U.S. Survey 5535, thence northerly, 600 feet, thence easterly, 300 feet, thence southerly, 600 feet, to the point of beginning on the northern boundary of U. S. Survey No. 5535, as shown on Exhibit B, which is attached to and made part of this instrument.

Southern Extension:

Commencing at corner number 4 U. S. Survey 5535, the point of beginning, thence easterly, 35 feet on the same bearing as the southern boundary of U. S. Survey 5535, thence southerly, 600 feet, thence westerly, 300 feet, thence northerly, 600 feet, thence easterly, 265 feet, along the southern boundary of U.S. Survey 5535 to the point of beginning, as shown on Exhibit B, which is attached to and made part of this instrument.

Located in protracted Sections 10 and 15, unsurveyed Township 7 North, Range 13 East, Copper River Meridian, Alaska.

The area of use authorized by this RWCA is illustrated on the attached map (Exhibit B).

b. The areas authorized by this RWCA are two (2) three hundred (300) foot-wide by six hundred (600) foot- long airstrip extensions and consists of approximately 8.26 acres in total. Each extension consists of a one hundred (100) foot-wide by five hundred (500) foot-long runway extension core area surrounded by a one hundred (100) foot-wide vegetation control area.

c. This RWCA shall not be construed as an interest in the land authorized for use by this RWCA, or as an abandonment of use and occupancy by the United States, but shall be considered a use of the land as described, anything contained herein to the contrary notwithstanding. This RWCA shall not be construed as an interest in water or a water right or as an abandonment of water use by the United States.

d. The stipulations, plans, maps, or designs set forth in Exhibit A, dated January 24, 2012, attached hereto, are incorporated into and made part of this instrument as fully and effectively as if they were set forth herein in their entirety.

4. Rental Fee. No rental fees apply because it is NPS policy not to charge fees when a requested use involves exercise of a right (not a privilege).

5. General Terms and Conditions:

a. The Holder shall comply with all applicable State and Federal law and existing regulations in the construction, operation and/or maintenance within the area authorized by this RWCA. It is the responsibility of the Holder to obtain any permits or other authorizations that are required by other governmental entities for the uses authorized by this RWCA.

b. This RWCA will expire when it is no longer needed for the purposes for which it is issued unless, prior thereto, it is relinquished, abandoned, or modified pursuant to the terms and conditions of this instrument or of any other applicable federal law or regulation.

c. This RWCA may be amended to adjust the terms and conditions for changed conditions, to correct oversights, or to address conditions not previously contemplated. Either the NPS or Holder may initiate an amendment by notifying the other in writing and providing a justification for the proposed revision or supplement. Amendments by mutual consent of the NPS and Holder may occur, but the NPS may also require an amendment without the consent of the Holder if uses within the area authorized by this RWCA or other conditions become inconsistent with the regulatory standards of Title 43 CFR 36.9 and 36.10(e)(1). The NPS will consult with the Holder when any amendment is initiated. Any amendment must result in the Holder continuing to have adequate and feasible access to his/her property.

d. The Holder shall perform all operations in a good and workmanlike manner.

- e. This RWCA is for the purpose of providing the Holder with access across NPS lands to his/her non-federal land or valid occupancy. It does not authorize the Holder to use the area authorized by this RWCA for any activities other than access.
- f. This RWCA may be assigned. The proposed assignee must state in writing that he/she agrees to comply with and to be bound by the terms and conditions of the existing RWCA. With such a written statement from the proposed assignee, the NPS Regional Director will approve the assignment of the RWCA to the assignee, who shall become the Holder. The assignment becomes effective upon the written approval of the NPS Regional Director, Alaska Region.
- g. Resource Protection. The Holder shall take adequate measures as directed and approved by the superintendent of the NPS unit to prevent or minimize damage to resources. This may include restoration, soil conservation and protection measures, landscaping with indigenous grasses and shrubs, and repairing roads, trails, etc. The superintendent or his/her representative may enter and inspect the area authorized by this RWCA and any facilities in it, as deemed necessary by the NPS and without restriction.
- h. Cultural Resources. The Holder will halt any activities in the area authorized by this RWCA and notify the superintendent of the NPS unit upon discovery of archeological, paleontological or historical artifacts. All artifacts unearthed remain the property of the United States.
- i. Pesticides/Herbicides. Use of pesticides or herbicides is prohibited within the area authorized by this RWCA.
- j. Use by the Holder is subject to the right of the NPS to establish trails, roads, and other improvements and betterments over, upon or through the area authorized by this RWCA. Also, at the discretion of the NPS, the area authorized by this RWCA may be open to use by the public and others. If it is necessary for the NPS to exercise such right, every effort will be made by the NPS to refrain from unduly interfering with use of this area by the Holder for the purposes intended under this RWCA. The Holder agrees and consents to the occupancy and use by the NPS and by individuals and entities authorized by the NPS, of any part of the area authorized by this RWCA. The Holder's right to "adequate and feasible access" under Title XI of ANILCA will be respected by the NPS.
- k. No deviations from the locations authorized in this RWCA shall be undertaken without the prior written approval of the superintendent of the NPS unit. The superintendent may require the filing of a new or amended application for a proposed deviation.
- l. Notwithstanding the relinquishment or abandonment of this RWCA by the Holder, the provisions of this RWCA, to the extent applicable, shall continue in effect and shall be binding on the Holder, its successors, or assigns, until they have fully satisfied the obligations and/or liabilities accruing herein.
- m. Upon expiration or termination of this RWCA, in the absence of any agreement to the contrary, the Holder will be allowed six (6) months or such additional time as may be granted

in which to remove from the area authorized by this RWCA all property or improvements of any kind, other than a road and usable improvements to a road, placed thereon by the Holder; but if not removed within the time allowed, all such property and improvements shall become the property of the United States.

n. Upon expiration or termination of this RWCA the Holder may be required by the NPS to restore the NPS lands affected by the RWCA.

o. This RWCA has no effect on any valid existing rights of access pursuant to any other authority.

p. The Holder agrees that in undertaking all activities pursuant to this RWCA, it will not discriminate against any person because of race, color, religion, sex, or national origin.

q. No member of or Delegate to Congress or Resident Commissioner shall be admitted to any share or part of this RWCA or to any benefit that may arise therefrom, but this provision shall not be construed to extend to this RWCA if made with a corporation for its general benefit.

r. Holder shall indemnify the United States against any liability for damages to life, person or property arising from Holder's occupancy or use of the areas authorized for their use.

s. Any alterations to this instrument must be in writing and signed by the NPS and Holder.

t. Nothing herein contained shall be construed as binding the NPS to expend in any one fiscal year any sum in excess of appropriations made by Congress or administratively allocated for the purpose of this RWCA for the fiscal year, or to involve the NPS in any contract or other obligation for the further expenditure of money in excess of such appropriations or allocations.

u. The waiver of any breach of any provision of this RWCA, whether such waiver be expressed or implied, shall not be construed to be a continuing waiver or a waiver of, or consent, to any subsequent or prior breach of the same or any other provision of this RWCA.

IN WITNESS WHEREOF, the Regional Director, Alaska Region of the National Park Service, acting on behalf of the United States, in the exercise of the delegated authority from the Secretary of the Department of the Interior, has caused this ANILCA 1110(b) Right-of-Way Certificate of Access (RWCA 9865-12-001) to be executed this _____ day of _____, 2012.

Regional Director, Alaska Region
National Park Service
United States Department of the Interior

ACCEPTED this _____ day of _____, 2012.

Kirk Ellis
Printed name of Holder

Signature of Holder

EXHIBIT A: ALLOWABLE USES AND SPECIAL STIPULATIONS

ALLOWABLE USES:

- Holder may utilize the following types of motorized vehicles within the RWCA: airplanes, 2- wheel drive highway vehicles, 4-wheel drive highway vehicles, motorcycles, tracked and wheeled maintenance equipment, 4 or 6-wheeled and tracked all-terrain vehicles (ATVs) and off road vehicles (ORVs), and snow machines.
- Holder may use dump trucks, bulldozers or equivalent motorized equipment for construction and maintenance operations to place fill and grade the runway surface within the 100 foot-wide runway extension areas.
- Holder may place fill material within the runway to a level which exceeds the adjacent ground level.
- Holder may cut and/or remove vegetation, brush, shrubs, and living or dead trees from within the area authorized for use by this RWCA and maintain the vegetation within the vegetation control areas.
- Holder may place synthetic materials such as geotextiles, geoblock, and/or natural materials such as logs, sand, gravel and rock within the 100 foot-wide runway to prevent the loss of, and damage to, soils and substrates.
- Holder may plow snow within the 100 foot-wide runway.
- Holder may post an NPS approved sign noting that the runway provides access to private lands.

SPECIAL STIPULATIONS:

MAINTENANCE:

- Construction and maintenance operations shall be confined to the area authorized for use by this RWCA.
- Holder shall not blade the surface in the vegetation control zones.
- Holder shall contact the superintendent prior to the start of all non-routine maintenance activities (such as grading or brushing the surface or adding additional fill utilizing heavy equipment) to inform the NPS of the nature, extent and schedule of the work to be performed.
- Holder shall not pave, chip seal or otherwise hard seal the runway. Any change in surface material shall require prior written authorization by the superintendent.
- Holder shall not plow snow or grade the runway in a manner that disturbs the adjacent natural soil or vegetation in the vegetation control area.
- Holder shall remove any temporary stakes and/or flagging upon completion of construction or maintenance activities.
- Holder shall take all precautions necessary to prevent wildfires. No burning of debris on parklands will be allowed without specific authorization of the superintendent.
- Holder is authorized to cut or clear any standing live vegetation within the area authorized for use by this RWCA.
- Holder shall not use or place dust suppressant chemicals within the area authorized for use by this RWCA unless authorized by the superintendent or his/her designee.
- Holder shall obtain and maintain any required Army Corps of Engineer permits.
- Holder shall obtain and maintain any required Alaska Department of Transportation and Public Facilities permits.

- Holder shall allow for subsistence harvest of firewood and green logs within the area authorized for use by this RWCA prior to construction, as directed by the superintendent.
- Holder shall not disturb or damage any survey monuments.
- Holder is prohibited from taking sand, gravel, rock, soil or plant material from parklands outside of the area authorized for use by this RWCA.

FUELING:

- No refueling is authorized within the area authorized for use by this RWCA.
- All spills of oil, petroleum products, and hazardous substances shall be reported to the Alaska Department of Environmental Conservation (ADEC) in accordance with Alaska law. Concurrent spill notification shall be provided to the superintendent at (907) 822-5234 at the time notification is provided to ADEC.

HYDROLOGY:

- Holder shall maintain water control features to accommodate flood events and to avoid damage to the facility or environment.
- Holder shall insure that installation and replacement of surface water control features such as culverts, small bridges, French drains, ditches, grade dips, crowning, out-sloping, or depressions with permeable gravels, cobble, or rock will preserve natural hydrological functions within and adjacent to access facilities.

AQUATIC HABITAT AND FISH:

- Access facility drainages shall be routed away from potentially unstable stream channels, fills, and hill slopes.
- Side-casting of materials from an access facility is prohibited on segments within or abutting areas essential for riparian and aquatic protection.

WATER RESOURCES:

- Holder shall not measurably alter the water quality and/or the banks of streams, rivers, or lakes.
- Holder shall not block or change the character or course of, or cause measurable siltation or pollution in any stream, river, pond, pothole, lake, and lagoon or drainage system.

NATIVE PLANTS:

- Prior to importing fill material (such as borrow and gravel) for use on the access facility, Holder shall obtain approval by the superintendent or his/her designee that these materials are free of exotic or invasive plant species.
- When transporting livestock forage and bedding materials with non-native species and their seed across parklands, Holder shall prevent the loss of these materials onto parklands. These materials must be covered with tarps or enclosed in containers to prevent the introduction of exotic or invasive species on NPS lands.

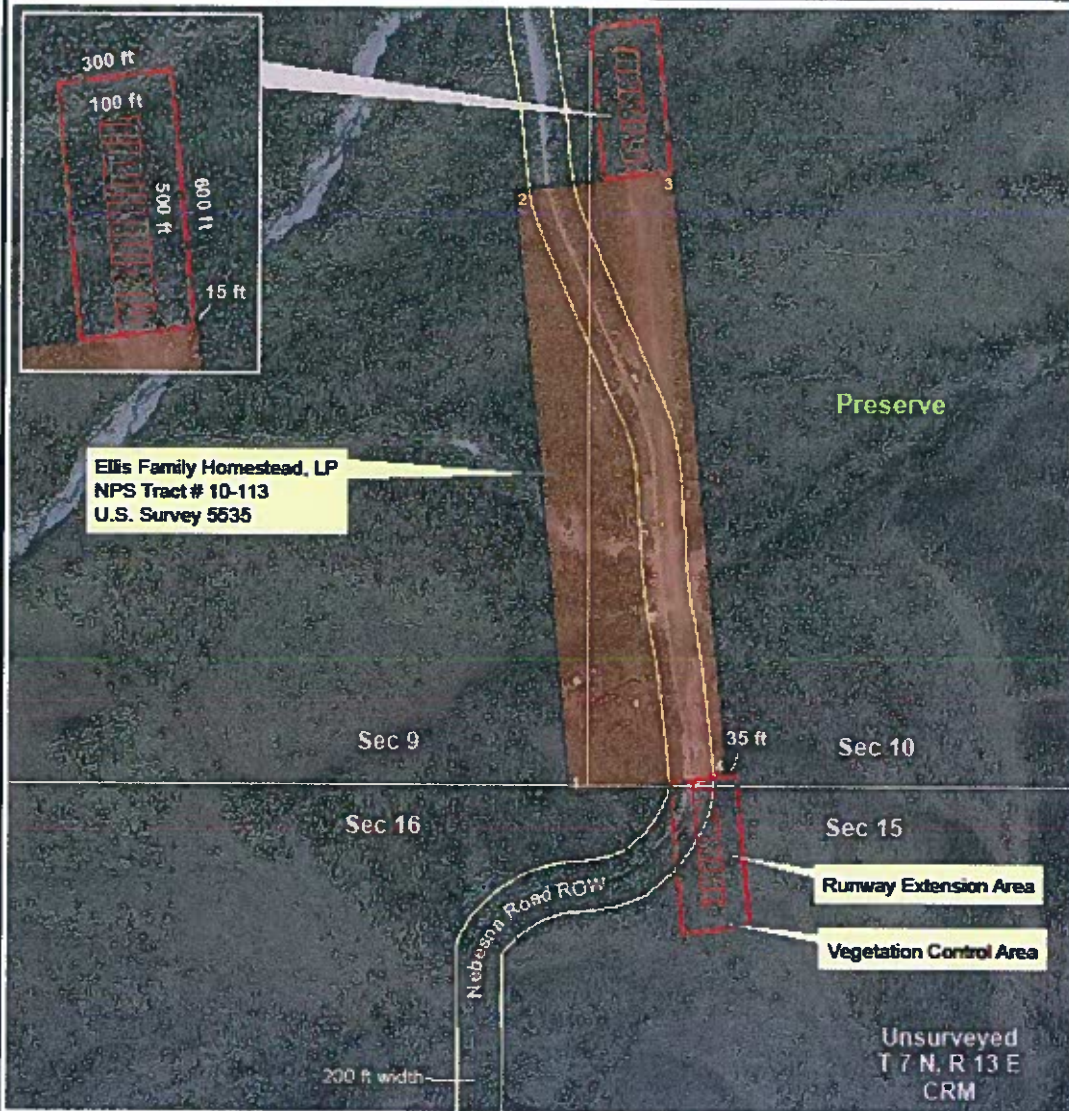
WILDLIFE:

- Holder shall not undertake the clearing of vegetation or construction during bird nesting seasons. If Holder conducts vegetation clearing, grubbing, and other site preparation and construction activities during bird nesting seasons, such activities shall be conducted in a manner that shall not result in the destruction of active bird nests, eggs, or nestlings. If an active nest is encountered at any time, it must be protected from destruction.

EXHIBIT B

ANILCA 1110(b) Right-of-Way Certificate of Access (RWCA) #9865-12-001
Wrangell-St. Elias National Park & Preserve

Total Width 300 Feet



<p>Legend</p> <ul style="list-style-type: none"> RWCA Private Land <p>Base Image: IKONOS Satellite Imagery from Year 2005</p>		<p>0 100 500 1,000 Feet</p> <p>National Park Service Alaska Regional Office Land Resources Program Center and Wrangell-St. Elias National Park & Preserve</p>
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ATTACHMENT C

DETERMINATION OF IMPAIRMENT

A determination of non-impairment is made for each of the resource impact topics carried forward and analyzed in the environmental impact statement for the preferred alternative. The description of park significance in chapter 1 was used as a basis for determining if a resource is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Impairment determinations are not necessary for visitor services, visitor experience, economic environment, safety, and park operations, because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources and values.

Visual Resources

Alternative 2 would cause direct impacts to visual resources. During the construction period, visual resources in the project area would be altered by the presence of crews, machinery, and associated activities. Once completed, the area's visual resources would be altered by the facilities' removal of vegetation (trees and shrubs) and its disturbed soils. Hand and mechanical maintenance activities would also temporarily affect visual resources.

The construction and maintenance of the airstrip extensions would affect the visual quality and aesthetics at each site, although their total area is small relative to the surrounding landscape, and the dominance of impact would be reduced by their proximity to previously developed private land.

The impacts on visual resources from Alternative 2 would include the addition of the two airstrip extensions, a minor expansion of colors and forms that would starkly contrast with the natural environment. However, considering the small size of the facilities and the limited period required for their construction and maintenance activities, that impact would be minor.

Alternative 2 would result in direct, medium intensity and long-term negative impacts to contextually-important visual resources. However, its overall effect would be minor, because its contribution is minimal in terms of the park's total visual resources and its proximity to existing development.

Vegetation

Alternative 2 would cause direct and indirect impacts to vegetation. The construction of the two airstrip extensions on park lands would result in the complete loss of approximately 2.3 acres and the alteration of approximately 5.96 acres of regionally-common vegetation. Vegetation would be cleared within the Runway Extension Areas and cropped near ground level within the Vegetation Control Areas. No threatened or endangered species of vegetation would be cleared or altered at either of the sites.

The impacts on vegetation from Alternative 2 would include direct loss of native plant cover and a potential reduction in ecological function, such as wildlife habitat, biomass production or carbon dioxide sequestration. These impacts would be minimized by the mitigation measures described in the EA and RWCA.

Indirect impacts resulting from this activity include the creation of an area suitable for establishment and propagation of invasive and exotic plant species. Some trampling of surrounding vegetation could also occur during construction and maintenance due to the increased activity around the sites.

Localized impacts to vegetation would be high, as they would result in the loss and/or alteration of vegetation within the project footprint for the foreseeable future. However, considering the small amount of regionally-common vegetation impacted relative to the size of the park, this impact would be minor.

Alternative 2 would result in direct, high intensity and long-term negative impacts to contextually-common vegetation. However, its overall effect would be minor, because its contribution is minimal in terms of the total park vegetation and those areas already impacted by previous activities and operations within the Nabesna Road corridor.

Soils

Alternative 2 would disturb about 2.3 acres of shallow subsurface soils during excavation, construction, and maintenance of the two RSAs. Direct impacts to soils as a result of Alternative 2 would be of medium intensity to a small, highly localized area and would include compaction, loss of cover, and exposure to localized runoff and erosion. Direct impacts from the project activities would be highest during construction, but would continue during maintenance activities at reduced levels.

Implementation of Alternative 2 would result in direct and indirect, medium intensity and long-term negative impacts to contextually-common soils. However, its overall effect would be minor, because its contribution is minimal in terms of the total park soils and those areas already impacted by previous activities and operations within the Nabesna Road corridor.

Wildlife

Alternative 2 would cause direct impacts to wildlife. During the proposed project's construction period, wildlife in the immediate vicinity of the construction activities would be temporarily displaced. Maintenance activities would also disturb wildlife.

This project would also eliminate approximately 2.3 acres and alter approximately 5.96 acres of wildlife habitat. However, neither of the proposed airstrip extensions would be located in a sensitive area.

The impacts on wildlife from Alternative 2 would include a direct displacement of wildlife and a reduction in available wildlife habitat. These impacts would be minimized by the mitigation measures described in the EA and RWCA.

Localized impacts to wildlife would be of medium intensity and long-term, as this action would result in a loss of habitat within the project footprint for the foreseeable future. However, considering the tiny amount of habitat impacted relative to the size of the park, that impact would be minor.

Alternative 2 would result in direct, low intensity and long-term negative impacts to contextually-important wildlife. However, its overall effect would be low, because its contribution is minimal in terms of total park wildlife populations.

SUMMARY

The minor adverse impacts anticipated as a result of implementing the preferred alternative on a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the park's general management plan or other relevant NPS planning documents, would not rise to levels that would constitute impairment.