

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

**Lake Clark
National Park and Preserve
Alaska**



General Management Plan Amendment

Finding of No Significant Impact

November 5, 2014

Recommended: M. L. Lodge 11/10/14
Superintendent, Lake Clark National Park and Preserve Date

Approved: Robert C. Smith 11/10/2014
Regional Director, Alaska Date

LAKE CLARK NATIONAL PARK AND PRESERVE

GENERAL MANAGEMENT PLAN AMENDMENT

FINDING OF NO SIGNIFICANT IMPACT

The National Park Service (NPS) has prepared a general management plan amendment for Lake Clark National Park and Preserve. The purpose of this plan amendment is to address how the National Park Service can best fulfill Lake Clark National Park and Preserve's purpose, maintain its significance, and protect its resources unimpaired for the enjoyment of present and future generations. The plan amendment serves as a framework to assist NPS managers in making decisions today and in the future. It updates the 1984 plan to current NPS standards for zoning and articulates desired future conditions for resources and visitor experience.

The environmental assessment (EA) evaluated three alternatives for managing Lake Clark National Park and Preserve, a no-action alternative, and two action alternatives. Alternative A, the no-action alternative, consists of a continuation of existing park management and serves as a basis for comparison of the other alternatives. Alternative B, the preferred alternative, would continue and enhance protection of the natural and cultural resources and wilderness character of the park and preserve, and would also foster increased visitor access, opportunities, and interpretation. Alternative C is similar to Alternative A in that it maintains existing use patterns, with some changes to park operations. Both action alternatives incorporate management zoning and visitor use indicators and standards to reflect current National Park Service guidelines.

DECISION

Alternative B is the National Park Service's preferred alternative (selected action) as identified in the environmental assessment. Alternative B will expand the diversity of available visitor activities and protect and maintain wilderness and park resources. This alternative will provide for more prescriptive management in areas that receive higher visitor use levels, such as in the preserve, near Lake Clark, and in some coastal locations. A range of management actions will be available to protect resources. A modest approach to improved infrastructure will be provided.

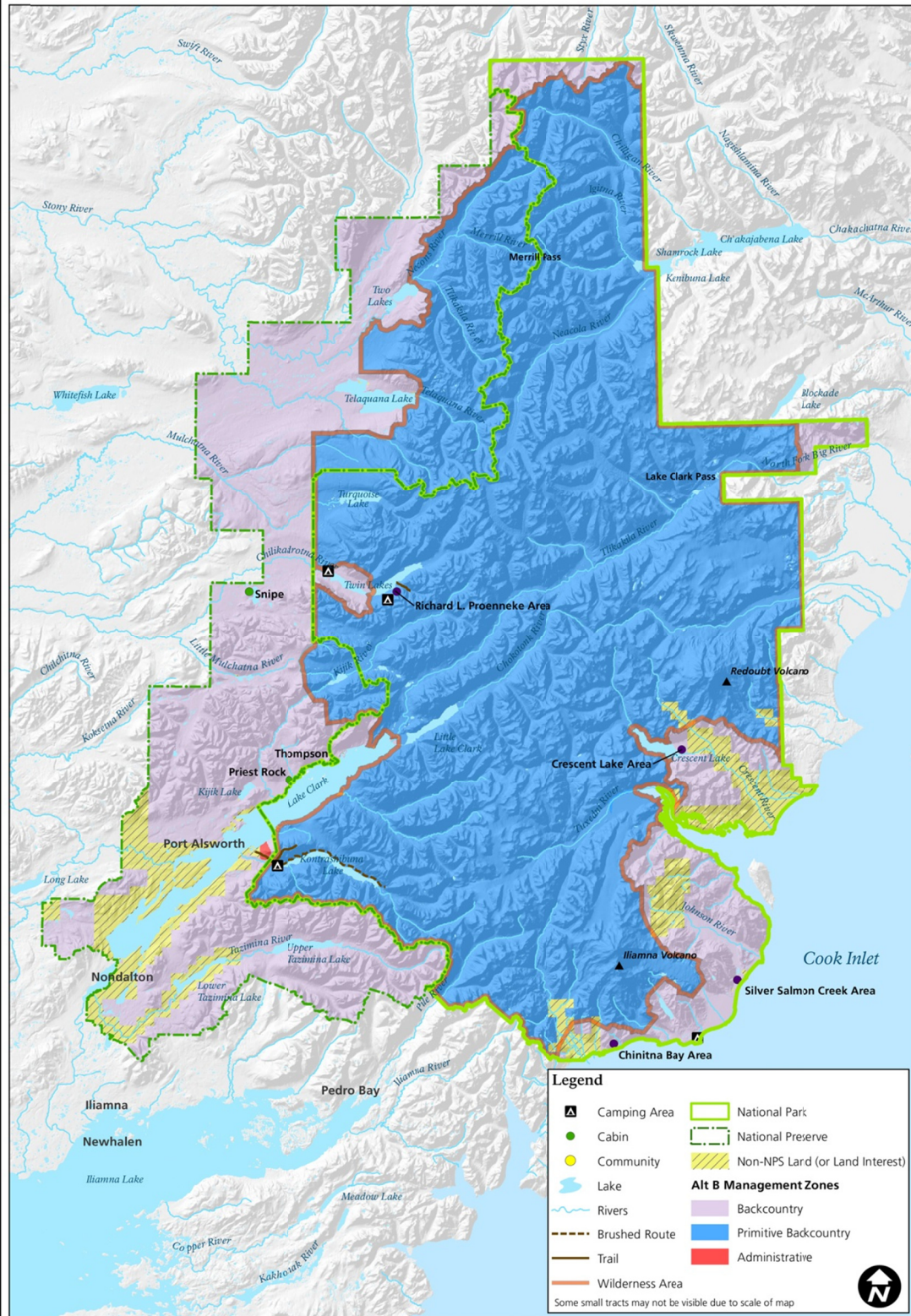
After appropriate future consultations and environmental compliance and/or planning processes are completed, key actions and strategies that will be considered under the preferred alternative include the following:

- Designating three to eight existing cabins for public use, including the Joe Thompson, Priest Rock (Allen Woodward) and Snipe Lake cabins;

- Managing the Richard L. Proenneke National Historic Site as an open-air exhibit focused on the connection between the site, the surrounding wilderness, and specific natural features;
- Identifying an informal water route on Lake Clark for recreation;
- Providing limited new commercial services to improve visitor access and expand the range of recreational opportunities;
- Providing improved visitor facilities, including an upgraded restroom facility at Port Alsworth, public bear-resistant improvements at high use areas and a day-use storage facility at Silver Salmon Creek;
- Brushing additional routes to provide expanded visitor opportunities, and improving the condition of some trails in the Port Alsworth area, and providing for accessible trail opportunities;



Alternative B



Produced by: NPS Denver Service Center Planning Division
Boundary file source: NPS Land Resources Division November 2011

0 5 10 20 Miles

Date: 10/1/2014

RATIONALE FOR THE DECISION

The National Park Service selected alternative B because it best meets the purpose and need for the GMP Amendment compared to the other alternatives. The selected alternative fully meets the requirements of ANILCA, the Wilderness Act, and NPS management policies. It also best addresses the issues raised by the public, park managers, and stakeholders, including management of visitor opportunities and amenities, cabins, the Richard L. Proenneke National Historic Site, and commercial services.

The selected alternative will expand/enhance opportunities for a diversity of visitor activities, while also protecting wilderness and park resources. Expanded/enhanced interpretive services and limited new commercial services, backcountry hiking routes, and a water route will improve recreational opportunities for visitors, focusing on popular destinations.

The designation of three to eight existing cabins for public use will be of particular benefit to visitors. The management zones clearly identify desired resource conditions and values to be maintained and visitor uses and opportunities to be provided in the park. All of the proposed actions in alternative B will have minimal adverse impacts on the park's natural and cultural resources, visitors, and subsistence users. Although the preferred alternative will require some additional funds and staff to fully implement, the park staff will work towards the goals of the alternative with existing funding.

Alternative A, No Action, would not accomplish the purpose and need for the GMP Amendment. No new opportunities would be provided for visitors to enjoy and access Lake Clark National Park and Preserve. The 1984 General Management Plan would continue to not meet current NPS policy and planning requirements. Many of the issues raised during the scoping process for this plan also would continue to not be resolved.

Alternative C was not selected because it focuses primarily on accommodating current patterns of visitor use. It would not provide new opportunities for visitors to use and enjoy the park.

MITIGATION MEASURES

As described in the General Management Plan Amendment, the following mitigation measures will be applied to avoid or minimize potential impacts from implementation of the preferred alternative. Because there is limited facility development or construction planned and due to the wild nature and light footprint of NPS management of the park, most of the mitigation procedures apply to ongoing operations and management.

- A minimum requirements analysis will be carried out for projects in designated wilderness to determine if and how actions or research would be implemented in accordance with the Wilderness Act, section 4 (c).

- Visitors will be educated in Leave No Trace ethics in order to minimize or avoid impacts on natural and cultural resources in and around historic cabins.
- Implementation of the GMP Amendment will require the Park Section 106 Coordinator to review specific proposed projects with the potential to affect cultural resources in compliance with Section 106 of the National Historic Preservation Act and the 2008 NPS Nationwide Section 106 Programmatic Agreement. Once the identification and evaluation processes have occurred, as needed, all reasonable measures will be taken to avoid, minimize, or mitigate adverse effects in consultation with the Alaska State Historic Preservation Officer, Alaska Native tribal groups, traditional councils, as well as Alaska Native Regional and Village corporations, as appropriate and necessary.
- Implementation of the GMP Amendment for certain proposed actions to historic structures and other properties that are listed or are considered eligible for listing on the National Register of Historic Places will require studies and plans, such as a historic cabin management plan. To appropriately preserve and protect national register-listed or eligible historic structures and associated cultural landscape features, all stabilization, preservation, or restoration efforts will be undertaken in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) and the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes (1996).
- All projects with the potential to affect natural resources will be implemented in compliance with state and federal laws, such as ANILCA section 810, to ensure that possible effects would be adequately addressed. All reasonable measures will be taken to avoid, minimize, or mitigate adverse effects in consultation with, Alaska Native tribal groups, traditional councils, the Lake Clark National Park Subsistence Resource Commission, and Federal Subsistence Regional Advisory Councils, as well as Alaska Native Regional and Village corporations, as appropriate and necessary.
- An emphasis will be placed on improving and maintaining relations with State of Alaska and Alaska Native tribal offices, local community groups, and community development efforts, including but not limited to
 - Continued emphasis on working with the Lake Clark National Park Subsistence Resource Commission
 - Continued participation in meetings of the Bristol Bay Federal Subsistence Regional Advisory Council
 - Continued participation and emphasis on developing strong partnerships with local communities, including but not limited to all Lake Clark resident zone communities
 - Continued emphasis on building relationships with tribes and initiating and engaging in formal government-to-government consultation

- An emphasis will be placed on educating Lake Clark and other NPS staff, visiting researchers, and other partners on
 - The Alaska Native Claims Settlement Act, the Alaska National Interest Lands Conservation Act, and other important laws in Alaska that relate to land management and land use
 - Unique aspects of Alaska history and culture, especially those that relate to the residents and communities of the park's resident zone that use areas within Lake Clark for traditional and customary activities
 - Areas or topics of special concern such as archeology in the park, subsistence use, and wilderness management
 - The distinctive and special aspects of the remote and wild character of Lake Clark National Park and Preserve

ALTERNATIVES

Two alternatives besides the preferred alternative were considered for the *Lake Clark National Park General Management Plan Amendment*. Under the No Action alternative, the park and preserve would continue to be managed according to existing law, policy and the original park general management plan without amendment. There would be no changes in facilities, access, or visitor services in the park and preserve.

Alternative C would focus on accommodating current patterns of use. The alternative would continue to maintain existing access, visitor use, and infrastructure. Minimal new infrastructure would be provided. No public use cabins would be designated under this alternative.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

According to Council on Environmental Quality regulations implementing the National Environmental Policy Act (43 CFR 46.30), the environmentally preferable alternative is the alternative that “causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the responsible official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative.”

Alternatives B and C were both identified to be environmentally preferable in the *Lake Clark General Management Plan Amendment/Environmental Assessment*. Both alternatives would have minimal impact on biological or physical resources, and those impacts would be slight and localized in most cases. There are only minor facility improvements in the park and preserve under alternative B, and none under alternative

C. Although both action alternatives would have different impacts on the environment due to their slightly different emphasis on visitor use, education, and management activities, the impacts from both alternatives would be small.

Both action alternatives provide environmental benefits over the no-action alternative through the use of management zoning, visitor use indicators and standards, and progress toward desired conditions for fundamental resources and values of the park and preserve. There is little difference between the two action alternatives because both are strongly grounded in the provisions of the Wilderness Act, ANILCA, and NPS policies for protection of resources from damage. There are slight differences between the two action alternatives in the ways they would impact, protect, preserve, and enhance historic, cultural, and natural resources.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 *Code of Federal Regulations* (CFR) §1508.27, significance is determined by examining the following criteria:

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.

No major adverse or beneficial impacts were identified that will require analysis in an environmental impact statement. No greater than moderate adverse impacts will result to any resource from implementation of alternative B.

Overall, Alternative B will have a beneficial impact to brown bears, some historic structures, museum collections, archeological resources, and visitor use and experience. It will result in minor to moderate negative impacts to archeological resources, and minor negative impacts to soils and vegetation, brown bears, historic structures, and wilderness character in some localized instances. None of these impacts meet the threshold of significant impacts.

The degree of effect on public health or safety.

Visitor safety will remain a priority under the selected action. The elements proposed in the selected action will not result in any additional risks to human health or safety not already inherent in the natural environment of Lake Clark National Park and Preserve. Alternative B will have a positive impact on some visitors' health and safety because of actions such as maintaining cabins in the backcountry for public use and brushing some routes.

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

As described in the environmental assessment, no major adverse impacts were identified for any rare or unique resources or values due to the selected action.

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

Implementation of alternative B will not result in highly controversial effects on the quality of the human environment. Given the relatively few comments that were received on the environmental assessment and the substance of these comments, there is no evidence that the effect to the quality of the human environment will be highly controversial.

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, and is not likely to result in any highly uncertain impacts to the human environment. The actions proposed in the selected alternative are similar to actions taken in other national park units in Alaska.

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

The implementation of Alternative B does not establish a precedent for future actions. All of the actions proposed in the alternative are consistent with the NPS Organic Act, the Alaska National Interest Lands Conservation Act (ANILCA), and NPS management policies.

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.

The environmental assessment analyzed the cumulative impacts of past, present, and reasonably foreseeable actions in the area. No major or significant cumulative impacts were identified that will result from the implementation of alternative B.

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.

Alternative B will result in long-term, localized, minor to moderate adverse impacts to precontact and historical archeological resources, minor adverse impacts on historic cabins, minor adverse impacts on the Richard L. Proenneke National Historic Site, and minor to moderate adverse impacts on collections. However, none of these impacts will be a significant adverse effect. The adverse impact will neither diminish the overall

integrity of the park's cultural resources nor compromise their potential for listing in the national register.

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.

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

No federal, state, or local laws or requirements imposed for the protection of the environment will be violated by implementing this action.

PUBLIC INVOLVEMENT, AGENCY CONSULTATION, AND COMMENTS ON THE ENVIRONMENTAL ASSESSMENT

Public involvement for the General Management Plan Amendment was initiated in June 2011 with the release of a newsletter. Public scoping meetings were held in Anchorage, Homer, and Soldotna. Thirteen members of the public participated in those meetings. Meetings were also held in the resident zone communities of Port Alsworth, Iliamna/Newhalen, Nondalton, Kokhanok, and Pedro Bay. A total of 36 people attended those meetings. The general planning process and timelines were explained and public concerns and comments were noted. A total of 25 comments were submitted after this series of meetings. Shortly after these meetings, the National Park Service initiated contact with the Lake Clark National Park Subsistence Resource Commission. No concerns were raised.

A second newsletter focused on preliminary management alternatives was distributed in March 2012. An update on the wilderness eligibility reassessment was also included in the newsletter. The public was invited to share their feedback at open houses and an online public meeting. Open house events were held in Homer, Soldotna, and Anchorage. In total, 21 people attended the meetings. An online public meeting was held on April 26, 2012, through social media platforms Facebook and Twitter. A total of 47 separate correspondences were received during the comment period. These comments, as well as comments collected during the public meetings, were considered and incorporated as appropriate into the plan.

A third newsletter was distributed in February 2013. The newsletter was informational in nature, and focused on the preferred alternative for the plan amendment. The newsletter also included a schedule for the rest of the planning process. The newsletter was left open on PEPC for comments for 30 days, but comments were not expressly requested. Public comments generally focused on the zones and the number of cabins. The NPS planning team subsequently made changes to the zone names and

descriptions. The number of cabins also was changed back to what was stated in the alternatives newsletter.

Section 106 Consultation

To meet the requirements of 36 CFR 800, the National Park Service initiated consultation with the Alaska State Historic Preservation Officer as part of state review of this document. Park staff met with the State Historic Preservation office staff on April 9, 2012; July 13, 2012; and February 5, 2013. Discussions focused on implementation of the preferred alternative, Section 106 consultation processes and collaboration, identifying when the Section 106 process would be triggered for specific proposed actions, and the need to include archeology as an impact topic. Archeology was added as an impact topic due in part to these consultation discussions.

State of Alaska Consultation

Throughout the planning process, the National Park Service consulted with the State of Alaska. A draft of this document was provided to the State of Alaska ANILCA program office for review. Park and regional office staff met with state staff on December 19, 2012. Discussions focused on questions and concerns about the plan and suggestions from the state to edit some language in the plan. Changes to the plan that resulted from these discussions included clarifications of language in the draft plan about management zoning, wilderness eligibility, and hunting. A second meeting was held on July 10th, 2014. These discussions included further clarification regarding the status of the 1984 GMP, the NPS park planning framework, and some of the proposed changes expected as part of this decision document.

Government to Government Consultation

The park superintendent initiated ongoing consultation on the plan amendment in a letter sent to tribes and Native corporations on May 24, 2011. The letter stated the park's intent to conduct government-to-government consultation with tribes as well as to consult with tribes and corporations pursuant to section 106 of the National Historic Preservation Act. The Lake Clark National Park and Preserve community liaison based in the Pedro Bay tribal office communicated largely via phone and e-mail with tribal offices to call attention to the planning newsletter that had been mailed to corporations and tribes, to provide additional copies, and to encourage participation in the upcoming community meetings. The liaison assisted park staff in communicating with tribes and encouraging comment and input on the planning process. Meetings with affected Alaska Native entities were held on an ongoing basis throughout the planning process.

A second government-to-government consultation letter was sent by the superintendent to the tribes (with native corporations copied) on October 25, 2011, to follow up on the summer 2011 public meetings and to share the record of public comments from those meetings. This letter invited and encouraged participation in the planning process and

specifically invited tribes to request that meetings be scheduled with the superintendent at their convenience.

The title of the front-country zone, which was termed “developed zone” in early draft elements of the plan, was changed to “front-country” zone due to suggestions during tribal consultation. Further modifications of the zone occurred by deleting the front-country zone and adding an administrative zone for Port Alsworth.

A third letter was mailed February 19, 2013, to continue consultation on the plan. Meetings were held in April 2013 with the Nondalton and Iliamna Tribal Council. No concerns about the GMP Amendment were raised.

In-person meetings were held with Cook Inlet Region, Incorporated and Kijik Native Corporations, and with the communities of Tyonek, Iliamna, Nondalton, and Port Alsworth, in 2013.

ALASKA NATIVE CLAIMS SETTLEMENT ACT (ANCSA) CONSULTATION

On May 25, 2011, and October 25, 2011, ANCSA corporations associated with Lake Clark National Park and Preserve received letters initiating ongoing consultation. Corporations were also invited to the public meetings in 2011 and 2012. Additionally, new U.S. Department of Interior policy on consultation with ANCSA corporations was released in August 2012. Although elements in this plan are not anticipated to affect corporation land, water, or resources, or impact the ability of corporations to participate in departmental programs, consultation was continued in spring 2013 via letters mailed March 2013. There were concerns raised about the term Non-NPS Land Interest in the alternatives map legend. As a result, a change was made to the legend to depict Non-NPS Land (or Land Interest).

CONCLUSION

As described above, the preferred alternative (alternative B) does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement. The preferred alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with adverse impacts that are localized and range from short- to long-term, and negligible to moderate. There are no unmitigated adverse effects on public health and safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection laws.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this plan amendment and thus will not be prepared.

ERRATA SHEET

Lake Clark National Park General Management Plan Amendment / Environmental Assessment

Throughout the document, replace text that the plan “updates and replaces the 1984 GMP” with the statement that the plan “updates the 1984 GMP”.

Throughout the document, remove all references to the NPS Alaska Management Guidelines.

Throughout the document, remove all references to the park’s “Land Protection Plan.”

Page 17: The reference to the park’s Land Protection Plan is removed; the plan is not currently posted on the park website.

Page 20, Table 1: ANILCA and implementing regulations have been added under Wilderness Character.

Page 22, Table 1: ANILCA and implementing regulations have been added under Visitor Use and Experience.

Page 36, Title: The title of this section was changed to “Lake Clark National Park and Preserve Area Descriptions.”

Page 36, Rustic Areas: Some content was deleted to make the first paragraph clearer.

Page 37, Rustic Areas: The language has been changed to “wild character” for consistency.

Page 47, Management Zones: ANILCA Sections 1315(a) and 1316 have been added to the description of the Primitive Backcountry zone.

Page 47, Management Zones: ANILCA Sections 1315(a) and 1316 have been added to the description of the Backcountry zone.

Page 58, Actions Common to All Alternatives: The State of Alaska has been specifically added to the list of organizations.

Pages 63 and 66, Alternative Maps: The “Rustic Areas” icon and label were deleted from the map legends.

Page 65, 3rd paragraph in left column: Changed “frontcountry zone” to “administrative zone.”

Page 75, Table 4: The cost estimates were completed in 2012; this has been added to the text.

Page 93, Brown and Black Bear: The word “substance” has been replaced with “subsistence”; this was a typographic error.

Page 192, 1st bullet under strategies is changed to: “Management of wilderness will continue to follow a minimum requirements analysis (MRA) where required, including all scientific studies that occur within the wilderness boundary.”

Page 192, 9th bullet under strategies: Delete the bullet “The wilderness designation process for the eligible, undesignated of Lake Clark National Park and Preserve will be carried out in accordance with NPS policies.”

Page 193, Appendix C, Fire Management: The date of the fire management plan has been changed to 2010.

Page 181, Appendix B, Wilderness Eligibility Reassessment: The location of Silver Salmon Creek (icon #11) has been corrected on the Unit 3 Inset map.

COMMENTS AND RESPONSES LAKE CLARK NATIONAL PARK GENERAL MANAGEMENT PLAN AMENDMENT / ENVIRONMENTAL ASSESSMENT

The environmental assessment was available for public review and comment for more than 60 days, from January 22, 2014 to March 26, 2014. Fifteen written comment letters were received from individuals, organizations, and agencies. These comments did not change the conclusions in the environmental assessment about the effects of the action.

1. GENERAL MANAGEMENT PLANNING AND NEPA CONCERNS

Comment: The General Management Plan (GMP) Amendment does not meet the requirements of Section 1317 of ANILCA for a comprehensive GMP revision.

Response: Section 1317 only addresses the wilderness review requirement. Section 1301 required a conservation and management plan be prepared for each unit of the national park system. The National Park Service fulfilled this requirement when it published the 1984 general management plan.

The National Parks and Recreation Act of 1978 and NPS Management Policies 2006 (§2.3.1.12) mandate that general management plans be reviewed and amended or revised to keep them current. As stated in the "Purpose and Need" for the GMP Amendment, this plan was intended to address several topics that either have changed since the original general management plan, or were not addressed in the 1984 plan, and to address changes that have occurred in NPS management policies and in the NPS director's order on planning.

Comment: The NPS Portfolio of Management Plans and this GMP Amendment do not constitute a comprehensive general management plan.

Response: In June 2012 the NPS adopted a park planning portfolio approach to guide decision-making. As stated on page 29, the portfolio is a dynamic compilation of planning elements that are updated as needed. It includes a variety of plans, including the GMP Amendment, as well as the park foundation document, site management plans, and implementation plans, such as a cabin management plan or a long-range interpretive plan. Taken together, the plans in the portfolio will address all of the park's issues and topics in a single, unified system, and thus is in fact a comprehensive approach to planning.

Comment: An environmental impact statement rather than an environmental assessment should have been prepared for this plan.

Response: The scoping for this plan, including written public comments and public open houses, revealed no major issues or concerns that needed to be addressed. In addition, we did not propose major, potentially controversial changes in the plan that merited preparation of an environmental impact statement, as required under the National Environmental Policy Act and Council of Environmental Quality guidance. Finally, none of the proposed actions were determined to result in a major or significant impact to the environment. Thus, an environmental assessment was the correct NEPA pathway for this plan.

Comment: The statement “it is probable that use levels will increase in the future” is unsubstantiated.

Response: The plan used the best available data, which is commercial use authorization (CUA)-reported visitor numbers, to analyze use levels, and the trend does show an increase in visitation, especially along the Cook Inlet coast. Please refer to the Visitor Use section (pp. 109-114), in particular the graphs on page 110. In addition to the data in the environmental assessment, park data show that between 2009 and 2013, the park’s visitation increased by 34%.

Comment: The zoning of the wilderness area diminishes wilderness.

Response: Management zones identify and describe the appropriate variety of resource conditions and visitor experiences to be achieved and maintained in different areas of a park. They cover desired conditions for resources, visitor uses, and facilities in different parts of a park, consistent with the park’s purpose, significance, and special mandates. Management zoning is a required element under NPS Management Policies 2006 (§2.3.1.2). Zoning also appropriately addressed differences in desired visitor experiences and resource conditions in wilderness, so long as the zones do not diminish or reduce the maximum protection afforded lands with wilderness values (NPS Management Policies, §6.3.4.1). As described on page 47 in the Lake Clark General Management Plan Amendment, both the primitive backcountry and the backcountry zones would protect the wilderness qualities of both designated and eligible wilderness as required under NPS policies. No prescriptions are proposed within these zones that would be inconsistent with the protection of wilderness.

Comment: The rustic areas are a form of zoning and suggest future management.

Response: Rustic areas are not zones, nor do they prescribe management of these areas. As stated on page 36, the rustic areas are descriptions of areas of the park that “would be managed based on the character and quality of the underlying management zone.” Rustic areas are descriptions intended to depict what exists in four areas at the

time of the writing of this plan and to assist with both visitor expectations and management decisions in the future.

Comment: The plan did not provide a map for alternative A to provide comparisons with alternatives B and C.

Response: Alternative A, the no-action alternative, would continue current management direction. No management zones exist under this alternative, unlike alternatives B and C. Consequently, the overview map of the park on page 6 in the document represents alternative A and is sufficient for purposes of comparison with the other alternatives.

Comment: Priority should be given to conducting baseline studies of park resources, including establishing soundscapes for each area subject to visitation, so that monitoring can be undertaken and the qualities of a natural, wilderness park be preserved to the maximum extent possible.

Response: We agree that it is important to conduct baseline studies of park resources, including soundscapes, and are conducting such studies as resources and staff permit. As noted on page 186, 187, 190, and 193, monitoring of the park's ecosystems, landscapes, vegetation, and wildlife is an important strategy to assess conditions and trends. Furthermore, it is noted on page 195 that NPS staff will inventory and monitor, as feasible, key locations for maintaining natural acoustic conditions. NPS staff may also monitor soundscapes for trends in specific anthropogenic sources and potential impacts to the natural landscape.

Comment: It is not clear if the plan is intended to replace or update the 1984 GMP. As a replacement it does not appear to fulfill the provisions of ANILCA Section 1301.

Response: This plan updates the 1984 GMP. The 1984 GMP is still the primary comprehensive plan for Lake Clark National Park and Preserve. This has been addressed in the Errata.

Comment: The Management Guidelines referenced in the plan may not fulfill the provisions of ANILCA 1301, need public review and should be included as part of this plan and NEPA document.

Response: The Management Guidelines document will not be referenced in the plan, and will not be included in this document. This has been addressed in the Errata.

Comment: The plan does not have enough maps to fulfill the provisions of ANILCA Section 1301.

Response: The maps in the 1984 GMP fulfill this provision.

Comment: The cost estimate presented in the plan is not sufficient.

Response: The cost estimates were done in a manner consistent with the Service's GMP-level planning standards.

Comment: The public meetings held for the GMP Amendment do not meet requirements to hold public hearings per section 1301 of ANILCA.

Response: The National Park Service is committed to ensuring that public involvement on Alaska GMP Amendments will be announced in accordance with Section 1301 of ANILCA. The National Park Service will clarify in announcements when a public meeting is also a "public hearing" for the purposes of meeting Section 1301 in the future.

A total of six public meetings were held on the plan during public review, which were broadly announced via letters; newspaper, radio, Chamber of Commerce and meeting facilities event calendars; newspaper display ad; posters; Lake Clark National Park and Preserve and NPS Alaska Regional Office webpages and social media platforms Facebook and Twitter; and through PEPC. In addition, eight public scoping meetings were held in 2011, three open houses in 2012, and an online public meeting held through the social media platforms Facebook and Twitter (see page 151).

While the meetings were not announced as "public hearings," we believe this is a technicality and the intent of section ANILCA 1301(d) was fulfilled under the GMP Amendment planning process. Attendance at the meetings was extremely low. All public comment received during the meetings was documented.

Comment: The plan provides no information regarding the intent to establish a water route on Lake Clark. The plan does not include the supporting laws, regulations, and policies needed for the establishment of a trail.

Response: The proposed route would be a recommended route for visitors to experience the park and would be shared through interpretive media to help with trip planning. It would not be an established trail.

Comment: The park and preserve boundary shown in the EA across Tuxedni Bay is incorrectly shown and is not consistent with the official ANILCA map.

Response: This issue has been ongoing for many years and has not yet been resolved. When it is resolved, all park documents including the GMP Amendment will be updated to reflect the final boundary.

2. WILDERNESS AND ELIGIBLE WILDERNESS

Comment: All of the original section 1317 wilderness reviews for Alaska national parks were completed as environmental impact statements. Because wilderness eligibility was reassessed in this plan, an environmental impact statement is warranted.

Response: A wilderness eligibility assessment does not require the preparation of an environmental document under the National Environmental Policy Act. An eligibility assessment is an administrative action that determines if lands meet the minimum criteria for inclusion in the national wilderness preservation system — it is the first step in the identification and designation of wilderness and is a preliminary step to preparing a wilderness study under NPS policies. Normally, under NPS policies eligibility assessments consist of a brief memorandum. The only requirement for a wilderness eligibility assessment under NPS policies (§6.2.1.3) is notification of the public of the assessment.

Comment: The preferred alternative will not adequately preserve the wilderness character of designated wilderness and impair wilderness eligible lands. Proposed visitor facilities are inappropriate for eligible and designated wilderness. The National Park Service proposes to impair wilderness with more facilities rather than place limits on public use.

Response: The National Park Service recognizes and appreciates the significance of wilderness in Lake Clark National Park. The Wilderness Act, ANILCA, and NPS policies do not permit us to propose facilities that would be inappropriate in wilderness. As noted on page 58, all designated and eligible wilderness areas would continue to be managed consistent with the Wilderness Act and NPS policies.

Very few facilities are proposed in the preferred alternative in either designated or eligible wilderness. The only facilities identified were brushed routes and public use cabins, both of which are appropriate facilities in wilderness under ANILCA. The preferred alternative only states that existing routes occasionally would be brushed (see page 71). Brushed routes simply means routes that would be cleared of large debris as needed, which is compatible with both designated and eligible wilderness. Public use cabins necessary for public health and safety are permitted under section 1315(d) of ANILCA. However, the National Park Service is not proposing to build any new public use cabins in designated or eligible wilderness. Several existing cabins are being proposed as public use cabins in eligible wilderness, but none of them are in designated wilderness. The existence and use of these public use cabins in eligible

wilderness does not preclude these areas from being proposed for wilderness designation, particularly if the cabins are historic.

The National Park Service uses a variety of management strategies to protect wilderness character from increasing public use, many of which are identified in table 2 (e.g., educate visitors). Limitations on the number of visitors and dispersal of concentrations of visitors are two measures that may be followed, but typically are the last steps that are implemented and given low use levels at Lake Clark these measures are not identified as being needed at this time.

Comment: The determination of the Johnson River in Unit 3 as eligible for wilderness should be revised. This area essentially surrounds inholdings of Cook Inlet Region, Inc.

Response: The National Park Service is required under the Wilderness Act to determine the eligibility of all its lands for inclusion in the national wilderness preservation system. The Johnson River area meets the criteria to be eligible for wilderness designation. However, a finding that an area is eligible does not necessarily mean it will be proposed for wilderness designation. Whether or not the Johnson River area would be proposed for wilderness designation will be determined when a wilderness study is completed in the future.

Comment: The plan does not reference ANILCA Section 1317 and assumes the 1988 Wilderness EIS process was not completed.

Response: The wilderness review process required under ANILCA Section 1317(b) has not been completed on the 19 million acres that were identified as eligible in the 1984-86 General Management Plans. Although EISs and Records of Decision were completed by the NPS, no final action was taken in the Secretary of the Interior's office and no wilderness recommendation was ultimately conveyed to Congress. Park General Management Plans remain the authority for eligible wilderness until a new wilderness study or eligibility assessment is completed.

3. FUTURE SELECTION OF PUBLIC USE CABINS

Comment: The plan is unclear regarding the future selection of public use cabins.

Response: As noted on page 15, over 70 cabins exist in the park and preserve, in varying ages and condition. Information on these cabins was compiled in Cabins of Lake Clark National Park and Preserve in 2003. Aside from the three cabins identified in the plan, it is not possible at this point in time for the National Park Service to identify which of the other cabins might be selected as future public use cabins. As stated on page 78, a future cabin management plan will determine which cabins will be preserved and may be designated for public use. As noted on pages 70-71, a cost-benefit analysis

would be conducted, evaluating such factors as visitor need and available park resources for managing and maintaining the cabins.

Comment: The National Park Service is planning to restore cabins in the park ahead of any decision in this plan, and is engaged in piecemeal planning, which does not comply with NEPA.

Response: No decisions have been reached on the future management and use of cabins in Lake Clark other than what is described in the January 2014 GMP Amendment. An environmental assessment was prepared for the Snipe Lake cabin in 2008, but this only covered the repair and rehabilitation of the cabin. As stated on page 78, a cabin management plan will be prepared in the future that will determine the disposition of cabins in the park, including those cabins that may be designated for public use in the future. This plan will be subject to the requirements of the National Environmental Policy Act and other appropriate compliance.

4. PROENNEKE CABIN SITE MANAGEMENT

Comment: Providing staff or volunteers at the site does not provide visitors with the experience of understanding and appreciating the wilderness life led by Richard Proenneke. To address the concern about potential vandalism, remove the artifacts from the cabin and replace them with copies and provide a written description of the site some distance from the cabin.

Response: As noted on pages 69-70, visitors would have opportunities for both NPS-led and self-guided visits at the Proenneke site, and some selected artifacts would be left on-site while others would be replicated and removed. There would be opportunities for visitors to explore the site and not see NPS staff, particularly if they come during nonpeak times. In addition, although some visitors appreciate having no other people at the site for a wilderness experience, others prefer the opportunity to listen to and learn from a NPS staff person or volunteer about the life of Richard Proenneke. We do not believe having a person on site detracts from the wilderness character of the overall area, and in fact can enhance the experience of visitors. Finally, as noted, the on-site presence of staff or volunteers can also help protect park resources.

Comment: The plan should expand the analysis to include the potential impacts to visitors who want a more developed and structured experience at the Proenneke site.

Response: The Proenneke site is located within designated wilderness and is accessed primarily by floatplane. If necessary, additional analysis would be conducted as part of a planning effort that proposes any expansion to the footprint of the site.

APPENDIX A— Nonimpairment Finding

NPS *Management Policies 2006*, section 1.4, requires analysis of potential effects to determine whether or not proposed actions would impair a park's resources and values. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park. Although Congress has given the National Park Service the management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the National Park Service must leave resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation 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 as being of significance in the park's general management plan or other relevant NPS planning documents.
- An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park.

This determination of no impairment has been prepared for the selected action described in the Finding of No Significant Impact, for the applicable impact topics that were considered in the 2013 Lake Clark General Management Plan Amendment / Environmental Assessment. Impairment determinations are not necessary in the areas of visitor experience, socioeconomics, public health and safety, environmental justice, land use, and park operations because impairment findings relate back to park resources and values. These impact topics are not generally considered park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissal of the above topics, the remaining areas for evaluation for possible impairment include: soils and vegetation;

brown and black bear; historic sites, structures, and cultural landscapes; museum collections and historic objects; and archeology.

Soils and Vegetation

The landscapes of Lake Clark National Park and Preserve range from the irregular coastline of western Cook Inlet framed by rugged peaks and spires, glaciers, and snow-clad volcanoes to the interior region characterized by braided glacial rivers, streams, waterfalls, and lakes. The park's soils and vegetation are similarly diverse. In general, soils in the park are young, poorly developed, variable, and derived from glacial or volcanic processes. Aside from some localized compaction of soils by visitors creating social trails and camping areas in a few localized areas, the vast majority of parks soils have not been disturbed or altered by people. Likewise, the vegetation communities in the park are extremely diverse – up to 24 different vegetation communities have been identified –and few areas have been altered by humans. The protection and interpretation of these important natural resources are elements of the preferred alternative.

The preservation of the soils and vegetation are of high importance in the selected alternative, in order to support the diverse, intact ecosystems of the park and preserve. There would be a minor, long-term adverse impact on the park's soils and vegetation due to visitors altering soils and vegetation at a few popular destinations, such as Twin Lakes, and possible development of a few facilities. The preferred alternative would also have some benefits for the park's soil and vegetation, due to improved management of existing camping areas, and the possible development of a boat storage rack, which would reduce trampling of soils and vegetation along Kontrashibuna Lake. Overall, the minor, adverse impacts would be highly localized, and therefore the preferred alternative would not result in impairment to soil and vegetation resources.

Brown and Black Bear

Lake Clark's brown and black bears are important species, both from an ecological and visitor standpoint. Healthy populations of brown/grizzly bears are found in all park habitats from coastal beaches to alpine areas, while black bear are found in all habitats but spend less time at higher elevations. Both are top predators, shaping populations dynamics of other animals and circulating nutrients in the ecosystem. The coast is renowned for high quality brown bear habitat, and viewing bears is one of the attractions for visitors. One of the purposes of the park is to protect habitat and populations of brown bear. Visitor use management along the coast is one of the key elements of the preferred alternative, in order to protect bears and their habitat while allowing for safe and sustainable bear viewing opportunities for visitors. The protection and interpretation of these important natural resources are elements of the preferred alternative.

The alternative would have a long-term, minor, adverse impact on brown and black bears in localized areas, primarily due to visitor use along the coast. However, this alternative would also benefit bears from the implementation of a visitor use

management framework and by providing bear-resistant visitor improvements at high use areas. Because the adverse impacts to bears would be minor and highly localized, and mitigated by beneficial outcomes of other management actions, there would be no impairment to brown and black bear.

Historic Sites, Structures, and Cultural Landscapes

Lake Clark National Park and Preserve contains many historic cabins and structures that have been used for subsistence and sport hunting, mining, and trapping since the late 19th century. Selected backcountry cabins are identified for potential public use under preferred alternative, in order to provide safe and available opportunities for visitors in the backcountry. Some of these restored cabins (e.g., Priest Rock [Allen Woodward], Joe Thompson, and Snipe Lake cabins) have been determined historic structures eligible for the National Register of Historic Places. The Richard L. Proenneke National Historic Site on Upper Twin Lake is listed in the national register. Completed in 1968, the Proenneke cabin and associated historic site preserve and interpret an important era in Alaskan history as well the conservation movement. The cabins are in designated or eligible wilderness, and protection of wilderness character is an important consideration for the management of cultural resources, visitor experience, and use. The park also contains several important cultural landscapes, including the Kijik Archeological District/National Historic Landmark, and the national register-listed Telaquana Trail. The entire park and preserve also represents an ethnographic landscape encompassing a significant part of the ancestral coastal and interior Dena'ina homelands. The protection and interpretation of these important cultural landscapes are key elements of the preferred alternative.

The selected alternative would have long-term, minor adverse impacts on some historic sites and structures, such as wear and tear on public use cabins, and continued visitor use at the Proenneke site. Long-term, minor to moderate beneficial impacts on selected historic cabins, associated structures and cultural landscape features and on the Proenneke site are also expected from the preferred alternative, due to preservation treatments of site structures and cultural landscape features. More detailed strategies for cabin treatment and use would be incorporated in a future cabin management plan, as specified in the preferred alternative. Because the adverse impacts to historic sites, structures, and cultural landscapes would be minor and highly localized, and mitigated by beneficial outcomes of other management actions, there would be no impairment to these resources.

Museum Collections and Historic Objects

The park preserves a collection of artifacts, archives, natural history specimens, oral histories, movies, and images that document the natural and cultural history of the area, as well as the park's administrative history. Original furnishings and other items displayed at the Proenneke cabin and other historic cabins are treated as museum objects although they are not yet technically part of the park's museum collections. The collections consist of approximately 222,000 items and most are stored in the Alaska Regional Curatorial Center in Anchorage. Natural history items include a herbarium and a diverse collection of mammal, fish, insect, paleontological, and geological specimens

from across the park. Over 200 oral history recordings and 2,500 historic photos are included in the collection. The collection also includes items from historic cabins and structures across the park and preserve, some of which are or will be used for interpretive displays or programming.

The opportunity to share the history of the park and preserve, the different eras of human use of the area, and the Proenneke site in particular are among the most important aspects of park management. The preferred alternative would have long-term, minor to moderate beneficial impacts on furnishings and objects associated with historic cabins, including the Proenneke site. Most historic objects would not be returned to the restored cabins and would instead be accessioned into the park's museum collection in Anchorage. Replicas of some original Proenneke-fashioned objects would be continued to be used in on-site interpretation. Minor to moderate adverse impacts may also occur from visitor use impacts on exhibited collection items, though those items would have been carefully selected for use in those situations. Because the adverse impacts to museum collections and historic objects would be minor and highly localized, and mitigated by beneficial outcomes of other management actions, there would be no impairment to these resources.

Archeological Resources

Park archeological resources include hunting camps, villages, burials, and ritual sites that document over 10,000 years of human use, occupation, and adaptation to the area's changing environments. The Kijik Archeological District National Historic Landmark includes an old village site, a Russian Orthodox cemetery, and more than a dozen other archeological sites associated with the Inland Dena'ina Athabascan people whose descendants continue to live in the Lake Clark area. The district is recognized as the largest known grouping of Dena'ina settlements and represents the most complete and intact archeological record of Dena'ina cultural continuity and change over the last 1,000 years. Other archeological districts have been recorded in the park that are eligible for listing in the national register.

Preservation of the archeological resources in the park and preserve is an important element of the selected alternative, which includes management actions intended to reduce adverse impacts and educate visitors. Long-term or permanent, localized, minor to moderate adverse impacts on precontact and historical archeological resources may occur under the preferred alternative from erosion, visitor use, and other factors. However, long-term, minor to moderate beneficial impacts would result from the continued management of archeological resources in accordance with NPS policies and guidelines, monitoring, and public education and outreach. Because the adverse impacts to archeological resources would be minor and highly localized, and mitigated by beneficial outcomes of other management actions, there would be no impairment to archeological resources.