



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

**Gates of the Arctic  
National Park and Preserve  
Alaska**



**General Management Plan Amendment / Wilderness Stewardship Plan**

**Finding of No Significant Impact**

**April 2016**

Recommended:  April 27, 2016  
Superintendent, Gates of the Arctic National Park and Preserve      Date

Approved:  7 June 2016  
Regional Director, Alaska      Date



**GATES OF THE ARCTIC NATIONAL PARK AND PRESERVE**  
**GENERAL MANAGEMENT PLAN AMENDMENT /**  
**WILDERNESS STEWARDSHIP PLAN**  
**FINDING OF NO SIGNIFICANT IMPACT**

The National Park Service (NPS) has prepared a general management plan amendment / wilderness stewardship plan for Gates of the Arctic National Park and Preserve. The purpose of this plan amendment is to address how the National Park Service can best fulfill Gates of the Arctic National Park and Preserve's purpose, maintain its significance, and protect its resources unimpaired for the enjoyment of present and future generations. The general management plan amendment / wilderness stewardship plan serves as a framework to assist NPS managers in making decisions today and in the future. It updates the 1986 general management 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 Gates of the Arctic 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 NPS preferred alternative, generally reflects current management conditions but applies current NPS planning standards through the use of zoning and indicators and standards for wilderness character to guide management. Alternative C applies current NPS planning standards to guide management, but would also foster increased visitor understanding of park resources through increased education opportunities.

**DECISION**

Alternative B is the National Park Service's preferred alternative (selected action) as identified in the environmental assessment. Alternative B will continue to protect the wilderness character of the park. Visitor services and park management and operations will occur at similar levels as today, including field activities, education, and interpretive programs. No new infrastructure and visitor facilities will be built within the park and preserve. To fulfill the intent of providing outstanding opportunities for solitude or primitive and unconfined recreation, visitor services and park operations and management will be conducted in a focused manner that minimizes the imprint of contemporary humans.

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

- The current National Park Service approach to managing the park and preserve will continue, including the current resource management approach. The focus of backcountry operations will continue to be on monitoring and protecting resources, monitoring use, and responding to emergencies.
- A strong focus will continue to be placed on protecting wilderness character, and opportunities for solitude and self-reliance.
- To promote opportunities to experience solitude, self-reliance, challenge, wilderness discovery, and freedom of movement in the park, no new roads or trails will be built (with the exception of the transportation right-of-way allowed under ANILCA section 201(4)(d)).
- No formal or designated access points will be established in the park and preserve, and new access points will not be encouraged.
- Temporary or permanent facilities for recreational visitor use are not planned, but the National Park Service may reconsider this for the safety, well-being and health of visitors.
- No new structures and facilities to support park operations are anticipated, but if they become needed they will be built outside the park and preserve.
- The National Park Service will further attempt to limit their interaction with and impact on visitors during patrols, research, overflights, etc., and will exercise restraint in NPS administrative activities to further support the emphasis on wilderness character and visitor wilderness experience.
- A wilderness character monitoring program will be established using indicators and standards. This program will be used to help determine if there is a need to allocate or distribute use to protect park resources and values.
- The National Park Service will continue to partner with Anaktuvuk Pass to help minimize trash debris into the John River.
- The park staff will develop a more active ATV trail monitoring system and management on park non-wilderness lands to mitigate resource impacts within Anaktuvuk Pass Land Exchange Area.
- Park staff will partner with Commercial Use Authorized aircraft operators to better distribute aircraft traffic along the John River.
- Nonnative plants in the Walker Lake area will be controlled through manual extraction of plants.
- The park staff will explore the possibility of a voluntary online orientation program for visitors.

## **RATIONALE FOR THE DECISION**

The National Park Service selected alternative B because it best meets the purpose and need for the general management plan amendment / wilderness stewardship plan 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, protecting wilderness character, and minimizing intrusions in the wilderness area.

The selected alternative will maintain opportunities for visitors, maintaining solitude and self-reliance, while also protecting wilderness and park resources. The management zones clearly identify desired resource conditions and values to be maintained and visitor experience and use and opportunities to be provided in the park. Instituting a wilderness character monitoring program will also help ensure the park's wilderness character and natural systems remain undiminished in the future.

All of the proposed actions in alternative B will have beneficial or minimal adverse impacts on the park's natural and cultural resources, subsistence users, visitors, and wilderness character. 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. The park's 1986 general management plan would continue to not meet current NPS policy and planning requirements. Without the application of zones and the use of indicators and standards there would be no framework by which park managers can monitor changes in wilderness character and determine if administrative activities and/or visitor use levels are resulting in unacceptable changes that require corrective action. The park would continue to not fulfill NPS policy requirements to have a wilderness stewardship plan. A number of the issues raised during the scoping process for this plan, including concerns regarding wilderness management, also would continue to not be resolved.

Alternative C was not selected because its focus did not emphasize protecting wilderness character to the same degree as alternative B. Although alternative C would increase educational and interpretive efforts to inform visitors about the park and its resources slightly more than alternative B, it could also result in some change to wilderness character due to the effects of visitor use in a few popular areas.

## **MITIGATION MEASURES**

As described in the general management plan amendment / wilderness stewardship plan, the following mitigation measures will be applied to avoid or minimize potential impacts from implementation of the preferred alternative. Because there is no facility

development or construction planned and due to the wild nature and light footprint of NPS management of the park, these are not traditional mitigation measures. Instead, most of the mitigation procedures apply to ongoing operations and management and are intended to support the relationships between the National Park Service and its partners.

- A minimum requirements analysis will continue to 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).
- All projects with the potential to affect natural or cultural resources will be implemented in compliance with state and federal laws, such as ANILCA section 810, to ensure that possible effects will 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 local 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 participation in the Subsistence Resource Commission and Indian Reorganization Act meetings, other tribal government concerns, and local subsistence advisory groups
  - continued participation and emphasis on developing strong partnerships with local communities, including but not limited to all Gates of the Arctic resident zone communities
  - continued emphasis on building relationships with tribes and participating in formal government-to-government consultation
- An emphasis will be placed on educating Gates of the Arctic and other NPS staff, visiting researchers, and other partners on
  - the Alaska Native Claims Settlement Act, the Alaska National Interest Lands Conservation Act, the Anaktuvuk Pass Land Exchange 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 Gates of the Arctic 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 Gates of the Arctic National Park and Preserve

## **ALTERNATIVES**

Two alternatives besides the preferred alternative were considered for the *Gates of the Arctic National Park and Preserve General Management Plan Amendment / Wilderness Stewardship Plan*. 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.

Like alternative B, alternative C would continue protection of the wild character of the park and preserve and apply current NPS planning standards through the use of zoning and indicators and standards to guide management. In addition, alternative C would seek to better foster visitor understanding and appreciation of park resources, the role the park played in the development of the wilderness concept in the United States, and climate change. Areas well-suited for education outreach and stewardship building would be identified. Opportunities would be sought for the park to serve as an outdoor laboratory and involve the public in some field activities. Where appropriate, limited new infrastructure and facilities could be developed in the future to enhance these opportunities or protect resources.

## **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 *Gates of the Arctic General Management Plan Amendment/ Wilderness Stewardship Plan Environmental Assessment*. Both alternatives would have minimal impact on biological or physical resources, and those impacts would be slight and localized in most cases. No facility developments in the park or preserve would occur under either alternative. 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 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 SELECTED 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 in the selected action that will require analysis in an environmental impact statement. No greater than minor adverse impacts will result to any resource from implementation of alternative B.

Overall, alternative B will have a beneficial impact to the park's vegetation and wildlife, wilderness character, cultural resources, visitor use and experience, subsistence use, and the socioeconomic environment. It will result in minor adverse impacts in a few popular use areas like Walker Lake and the Arrigetch Peaks to vegetation and wildlife, wilderness character, and to park operations. 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 Gates of the Arctic National Park and Preserve.

*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), the Wilderness Act, 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, minor beneficial impacts to cultural resources. No adverse impacts were identified.

*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 / wilderness stewardship plan was initiated with the publication of a notice of intent to prepare an environmental impact statement in the *Federal Register* on January 27, 2010. The intent at that time was also to prepare a wilderness study for Gates of the Arctic National Park and Preserve. The environmental impact statement and the wilderness study were subsequently terminated and an environmental assessment for the general management plan amendment / wilderness stewardship plan was prepared.

In February 2010, a scoping newsletter was distributed inviting the general public to open house events in Anchorage and Fairbanks, and public meetings in the following Gates of the Arctic National Park and Preserve Resident Zone Communities: Anaktuvuk Pass, Bettles/Evansville, Wiseman, Alatna, Allakaket, Nuiqsut, Kobuk and Shungnak. All meetings were completed by late April 2010. A total of 40 electronic and mailed comments were received in response to this newsletter. These comments were considered and incorporated into the issues for the plan.

A second newsletter was distributed in September 2010, and public meetings were set up in both Anchorage and Fairbanks the following month. A total of 17 people participated in the public scoping process at these meetings. In November 2010, public meetings were held in resident zone communities of Bettles/Evansville and Anaktuvuk Pass. The public meetings in resident zone communities were held in January and February 2011, in Allakaket, Alatna, Kobuk, and Shungnak. A total of 24 people attended meetings in these resident zone communities. Primary topics and issues on which comments were received include the level of visitor opportunities, solitude and quietness, subsistence use, proposal of new designated wilderness, and the importance of preserving Gates of the Arctic National Park and Preserve as the “ultimate wilderness park.” All comments were considered and incorporated into the issues for the plan.

In October 2011, a third newsletter was distributed to interested individuals, the resident zone communities, and others. This newsletter informed the public of the results from the previous scoping period and provided information on the wilderness study component of the plan, including maps of wilderness study options. No formal comment period was held with this newsletter.

Subsequently, the National Park Service decided to defer the preparation of a wilderness study until decisions on the congressionally authorized transportation corridor in the Western (Kobuk River) Unit. On November 20, 2013, the National Park Service published a notice in the *Federal Register* to terminate the wilderness study and environmental impact statement. The plan continued as an environmental assessment.

The plan/environmental assessment was available for public review from January 12, 2015 to March 13, 2015. A total of 74 written correspondences were received in the NPS Planning, Environment and Public Comment (PEPC) site, of which 40 were form

letters. Most of the correspondences were from private Alaska citizens. Organizations providing comments included the State of Alaska, National Parks Conservation Association, Sierra Club Alaska Chapter, Alaska Miners Association, Resource Development Council for Alaska, Arctic Slope Regional Corporation, and the Alaska Industrial Development and Export Authority.

Public meetings on the draft plan were held in Anchorage on February 17, 2015, in Fairbanks on February 19, and at Anaktuvuk Pass on February 25, 2015. A total of 10 people attended the Anchorage meeting, 11 individuals attended the Fairbanks meeting (which was also a public hearing per ANICLA), and three individuals came to the Anaktuvuk Pass meeting.

### **Section 106 Consultation**

To meet the requirements of 36 CFR 800, the National Park Service initiated consultation with the Alaska state historic preservation office as part of state review of this document. Park staff corresponded with the State Historic Preservation office staff in early 2015

### **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 in January 2012 and was invited to comment. The State of Alaska ANILCA program also commented on the plan in winter 2015. A final in person meeting was held on March 10<sup>th</sup>, 2016 before finalizing the document.

### **Government to Government Consultation**

The park superintendent initiated ongoing consultation on the plan amendment in a letter sent to tribes and Native corporations in early 2015. 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 Naqsrarmiut Tribal Council responded to the request for government to government consultation. Meetings with affected Alaska Native entities were held on an ongoing basis throughout the planning process. The communities of Anaktuvuk Pass, Alatna Village Traditional Council, and Native Village of Nuisqsut expressed support for the preferred alternative.

### **ALASKA NATIVE CLAIMS SETTLEMENT ACT (ANCSA) CONSULTATION**

ANCSA corporations associated with Gates of the Arctic National Park and Preserve (Arctic Slope Regional Corporation, Doyon Incorporated, NANA Regional Corporation) received letters inviting consultation. Corporations were also invited to the public meetings in 2010, 2011, and 2015. 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 through the Spring of 2015.

## **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 minor. 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

### **Gates of the Arctic National Park and Preserve General Management Plan Amendment / Wilderness Stewardship Plan / Environmental Assessment**

Corrections and revisions to the general management plan amendment / wilderness stewardship plan / environmental assessment are listed in this section. These revisions have not resulted in substantial modification of the selected action. It has been determined that the revisions do not require additional environmental analysis. The page numbers referenced are from the *Gates of the Arctic National Park and Preserve General Management Plan Amendment / Wilderness Stewardship Plan / Environmental Assessment*.

Page 27, Introduction: The reference to the NPS Alaska Regional Management Guidelines has been removed.

Page 52, Table 3, Potential Management Strategies for Plant and animal species and communities: Final sentence in this cell should read “Consider changes to hunting regulations (e.g. changes to bag limits, seasons, permits, closures) though working with ADF&G Board of Game or Federal Subsistence Board, superintendent’s compendium, etc.

Page 52: Remove indicator “Plant and animal species and communities”. The measurable standard does not sufficiently reflect the state of the indicator.

Page 58, Delete Bullet #9, “The Isiak Cabin complex would be removed and the site rehabilitated.” In light of additional information obtained during the scoping process, the National Park Service will consider this action at a future date.

Pages 67, 79, 92 Temporary Facilities: The final two sentences of these sections are replaced with “Visitors may not construct new temporary facilities (including tent platforms), unless provided for by ANILCA 1316 and implementing regulations.”

Page 76, Visitor Permits/Registration: Add the following sentence to the end of the second paragraph “Implementation will follow established regulatory procedures.”

Page 133, Alternatives: The Impacts Summary Table (table 6) was inadvertently left out of the printed version of the document. The table was included in the PDF version of the document, which can be accessed at: [http://parkplanning.nps.gov/gaar\\_gmp](http://parkplanning.nps.gov/gaar_gmp).

Page 189, Environmental Consequences: The fourth bullet under General Assumptions should read: No major oil and gas drilling or mining occurs on Native corporation lands within the park during the life of the plan. Gravel mining for community infrastructure needs on certain Native corporation lands is allowed within the park. Arctic Slope Regional Corporation has access to subsurface areas for oil and gas in the Itkilik Lake area within the preserve.

Page 194, Environmental Consequences: “Tulilik Lake on the Itkillik River” should be “Lake Tulilik on the Killik River.”

Page 203 and 205, Environmental Consequences: Remove the references to proposing wilderness designation. The wilderness study and associated environmental impact statement was terminated in November 2013.

Page 235, Public and Agency Involvement: The name “Alaska Department of Transportation and Public Safety” was changed to the “Alaska Department of Transportation and Public Facilities”.

Page 235, Public and Agency Involvement: The North Slope Borough was added to the list of Local Communities and Local Governments.

Page 235, Public and Agency Involvement: The Nunamiut Corporation and AIDEA were added to the list of Nongovernment Organizations and Businesses.

Page 237, List of Agencies, Organizations, and Individuals Receiving a Copy of this Document: The Arctic Slope Borough was changed to the North Slope Borough under Regional and Local Governments.

Pages 259 and 307, Appendix C and References: References to the “Gates of the Arctic Wild River Outstandingly Remarkable Value Statements” have been removed.

## **COMMENTS AND RESPONSES**

### **GATES OF THE ARCTIC NATIONAL PARK AND PRESERVE GENERAL MANAGEMENT PLAN AMENDMENT / WILDERNESS STEWARDSHIP PLAN / ENVIRONMENTAL ASSESSMENT**

The environmental assessment was available for public review and comment for more than 60 days, from January 12, 2015 to March 13, 2015. A total of 74 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. AMBLER MINING DISTRICT RIGHT-OF-WAY**

Comment: Commenters suggested the NPS consider the proposed Ambler Mining District project in this plan. Several comments suggested that visitors might use the Ambler Road right of way to access GAAR.

Response: As described on page 14 of the EA, section 201 of ANILCA provides for surface transportation access across the Kobuk River Preserve to the Ambler Mining District. On November 24, 2015 the NPS received a right of way (ROW) application for access under this provision. At this time, the NPS has not identified a specific route through the preserve and there is no certainty that a road will ultimately be constructed through the preserve. Consideration of a ROW through the Kobuk Preserve is outside the scope of this plan.

#### **2. ANILCA WILDERNESS REVIEW**

Comment: There was a wide range in the comments on how the plan amendment addressed the issue of proposing new wilderness in the preserve units. On one end of the spectrum, commenters stated the plan should have included a wilderness study and a proposal for new designation of wilderness within the park and preserve, as required under section 1317 of ANILCA. On the other hand, objections were raised to the stated intent to conduct a wilderness study in the future and that all non-designated lands will be managed to protect their wilderness character indefinitely.

Response: The National Park Service recognizes its legal requirement under the Wilderness Act and section 1317 of ANILCA to study the preserves for possible designation as wilderness. But section 201(4)(b)-(e) of ANILCA also provides for surface transportation access across the Western (Kobuk) Unit. As stated on pages 19-20 in the plan, the National Park Service believes a wilderness study cannot be undertaken for the Western (Kobuk) Unit until a decision has been reached on the location of the congressionally authorized transportation corridor — there is too much uncertainty about the location and design of the corridor, or even if it will pass through the unit, to prepare a wilderness study.

With regard to studying the lands in the future for wilderness designation, the National Park Service maintains that the requirements of section 1317 of ANILCA still applies — the agency is still required to conduct wilderness studies on all eligible park/preserve lands that were not already designated as wilderness by ANILCA. Although the 1987 date in the legislation to submit recommendations to Congress was not met, this does not eliminate the wilderness study requirement. NPS *Management Policies 2006* (§6.3.1) also require the agency to manage wilderness eligible lands, like the preserves, to protect their wilderness character until a decision is made on whether or not to designate these areas: “The National Park Service will take no action that would diminish the wilderness eligibility of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed.”

### **3. ACREAGE**

Comment: There is inconsistency in the acreage numbers provided in the document for the park, the preserve units, and the designated wilderness area.

Response: According to the NPS’s most recent calculations based on GIS data, the national park area proper is approximately 7,523,897 acres. The two units that make up the national preserves, the Eastern Unit (Itkillik) and the Western Unit (Kobuk River), together contain approximately 948,608 acres. Thus, the total park and preserve acreage combined is approximately 8,472,506 acres.

In 1980, Section 701(2) of ANILCA designated approximately 7,052,000 acres of the park as wilderness. Due to changes in land status conditions, a land exchange, and map refinements, this figure is now approximately 7,167,192 acres of designated wilderness.

### **4. MANAGEMENT ZONING**

Comment: A concern was raised that the management zones in the plan would adversely affect subsistence activities of Anaktuvuk Pass residents. It was noted that the zone 2 description did not recognize local subsistence use and was inaccurate regarding encounters with other people. It was also stated that while limited recreational improvements are allowed in all of the zones, under the Anaktuvuk Pass Land Exchange the construction of temporary facilities and structures was prohibited on Native lands if not related to subsistence activities.

Response: The National Park Service recognizes that part of the purpose of Gates of the Arctic National Park and Preserve is to provide opportunities for traditional subsistence use and activities. Subsistence is a fundamental value of the park and a primary use of the park. As stated on page 19, this plan does not change subsistence uses and opportunities in the park — the subsistence use management directions in the 1986 general management plan still apply in the park and preserve. And as stated on page 274, the park will continue to provide access for the opportunity for continuation of subsistence activities by Anaktuvuk Pass residents.

With regard to management zones, the zones identify desired conditions for resource conditions and visitor experiences, not for subsistence use, on lands managed by the National Park Service. As stated in the text on page 74, nonfederal lands within the park boundary, including Native regional and village corporation lands, Native allotments, and other private lands will not be zoned. As shown in the map on page 75, none of the lands in the vicinity of Anaktuvuk Pass are zoned. The zones' direction on limited recreational improvements does not apply to these lands.

## **5. COMMERCIAL SERVICES**

Comment: The text on pages 59-61 about commercial services does not identify which commercial services are appropriate within each management zone.

Response: All commercial services listed on page 59 are allowed in all management zones.

## **6. LAND PROTECTION PLAN**

Comment: The text states that Native allotments may be acquired or exchanged from willing sellers; there is a concern that this may suggest that the National Park Service views Native land ownership as inconsistent with park purposes.

Response: The National Park Service does not view Native land ownership as inconsistent with park purposes. The intent of this section was to clarify that Native allotments could be exchanged or acquired from willing sellers only. By law, NPS General Management Plans must address potential boundary adjustments, a topic which has been incorporated by reference into this document via the 2014 Gates of the Arctic National Park and Preserve Land Protection Plan.

## **7. CONSISTENCY WITH THE 1986 GAAR GMP**

Comment: It is not clear if the plan is intended to replace or update the 1986 GMP.

Response: This plan updates the 1986 GMP. The 1986 GMP is still the primary comprehensive plan for Gates of the Arctic National Park and Preserve.

Comment: The plan does not fulfill the provisions of ANILCA Section 1301.

Response: The sections of the 1986 GMP not amended fulfill this provision.

Comment: Snowmachine use is allowed pursuant to ANILCA Sections 811 and 1110 and ANILCA implementing regulations at 36 CFR 13.460 and 43 CFR 36.11(c), respectively. Closures have never been implemented by regulation, as required by 43 CFR 36.11(h).

Response: The 1986 GMP states that the park unit will be closed to recreational snowmachine use. However, closures to recreational snowmachine use have not been implemented by regulation because recreational snowmachining is not yet an issue due to the conditions for use within the Dalton Highway corridor, as maintained by the Bureau of Land Management. The chart indicates that any unauthorized use of snowmachining, as defined in the GMP, could trigger the potential management strategy of clarifying the policy set out in the GMP by crafting a regulation to enforce a prohibition on the recreational use of snowmachines in Gates of the Arctic National Park and Preserve.

## APPENDIX -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 2014 Gates of the Arctic General Management Plan Amendment Wilderness Stewardship Plan / Environmental Assessment. Impairment determinations are not necessary in the areas of visitor use and experience, subsistence use, socioeconomics, 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: natural resources

(including vegetation, wildlife, and water quality) and cultural resources (including archeological resources, historic structures, and ethnographic resources).

## **NATURAL RESOURCES**

Gates of the Arctic National Park and Preserve is a mostly undisturbed area with respect to its vegetation, wildlife, and water quality. The vast majority of the area has been left to the forces of nature. Ecosystem processes are intact throughout the park and preserve. Habitats are seamlessly interconnected and support wholly intact, naturally occurring plant and wildlife populations. These natural resources are a key element underlying the purpose and significance of the park and preserve, including its fundamental resources and values.

The diverse ecosystems and natural processes of Gates of the Arctic National Park and Preserve are especially vulnerable to the impacts of climate change. Average Arctic temperatures have risen at almost twice the global rate over the past 100 years. These temperature increases could cause things such as less snow cover, the loss of permafrost, changes to vegetative regimes, reduced precipitation, changes to the distribution and population densities of wildlife species, expanding ranges of invasive species, and the loss of Arctic lakes and wetlands. These impacts are occurring across Gates of the Arctic National Park and Preserve, are not fully understood, and will present future managers with infinite challenges.

Overall, the selected alternative would result in long-term, minor, adverse impacts to vegetation and wildlife and water quality in a few highly localized areas, mainly popular destinations like the Arrigetch Peaks and Walker Lake areas. None of these impacts would affect the viability of populations of plants and wildlife in the park, or substantially degrade water quality. Moreover, the selected alternative would also beneficially affect these resources due to the application and monitoring of wilderness character measures and standards. Therefore, the preferred alternative would not result in impairment to the park's natural resources.

## **CULTURAL RESOURCES**

Evidence of more than 12,000 years of human history is protected in Gates of the Arctic National Park and Preserve. Cultural resources in the park include sites used by prehistoric peoples, Iñupiat (Eskimos), Athabascans, miners, trappers, backcountry guides, and back-to-the-landers. Examples of archeological sites include campsites, villages, hunting overlooks, fish camps, caribou drive lines, and historic gold mining operations. More than 1,500 archeological sites have been documented in the park, although less than 2% of the park has been examined by archeologists. More recent historic sites include cabins and other structures associated with mining, trapping, and guiding activities. The park staff also protects ethnographic resources by working with

traditionally associated peoples to document and interpret their cultural and traditional practices, beliefs, and languages.

Overall, the selected alternative would result in long-term, minor, beneficial impacts to cultural resources. Cultural resources would continue to study the long-term human use of the area, such as carrying out written histories, ethnographic overviews, and archeological surveys and inventories. Law enforcement would continue to educate visitors about avoiding inadvertent damage to cultural resources. Continued monitoring and education efforts would result in increased understanding and protection of cultural resources. Therefore, the preferred alternative would not result in impairment to the park's cultural resources.