

United States Department of the Interior

NATIONAL PARK SERVICE

Klondike Gold Rush National Historical Park P.O. Box 517 Skagway, Alaska 99840

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March 3, 2004

PUBLIC REVIEW

Open until April 2, 2004

ENVIRONMENTAL ASSESSMENT

FOR THE CONSTRUCTION OF
MAINTENANCE AND CURATORIAL FACILITIES
IN SKAGWAY, ALASKA FOR
KLONDIKE GOLD RUSH NATIONAL HISTORICAL PARK

Dear Skagway Neighbor or Interested Person,

The National Park Service (NPS) is seeking public input on a construction project being considered in Skagway, Alaska. The NPS is proposing to construct certain facilities at the maintenance yard in Skagway. An environmental assessment (EA) has been prepared for the project. It analyzes three alternatives – the "no-action" alternative, the alternative to build three new buildings, and the alternative for a full lot build-out at the site. The project site is on Alaska Street between 1st and 2nd Avenue. It is a National Park Service owned administrative site, not within the boundary of the National Historical Park (which in Skagway is limited to the Historic District). The EA presents mitigation measures that set limits on any future construction of buildings, additions or facilities on the site. They have been designed to assure that construction is compatible with the character of Skagway.

The EA is available at the park office in Skagway, or on line at the park's web site at www.npg.gov/klgo. Comments on the EA are requested by April 2nd.

Please send your comments, to arrive no later than the close of business on April 2, 2004, preferably by email to Meg_Hahr@nps.gov, or by post to Meg Hahr, Natural Resources Program Manager at the above address, or by fax to 907 983-9249 attention Meg Hahr. If you have any questions, please contact Meg Hahr at 907 983-9228.

| Sincere | ly |
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| | |

Bruce Noble Superintendent

ENVIRONMENTAL ASSESSMENT

FOR THE CONSTRUCTION OF MAINTENANCE AND CURATORIAL FACILITIES IN SKAGWAY, ALASKA FOR KLONDIKE GOLD RUSH NATIONAL HISTORICAL PARK

February 2004



Figure 1. Photo of the Project Area – NPS administrative site, looking south, at the corner of 2nd Avenue and Alaska Street, Skagway, Alaska.

Open for Public Review Public Comment Period ends April 2, 2004 Please send your comments, to arrive by the close of business on April 2, 2004, preferably by email to: Meg_Hahr@nps.gov

or by post to: Meg Hahr, Natural Resources Program Manager Klondike Gold Rush National Historical Park P.O. Box 517 Skagway, Alaska 99840

or by fax to: 907- 983-9249 attention Meg Hahr

<u>Privacy Notice</u>: Comments received from representatives of groups, organizations or agencies will become part of the public record, and may be requested by interested parties under the Freedom of Information Act. Comments received from individuals will also become part of the public record unless the individual requests that their name, address, phone number, email or comment not become part of the public record. Such requests should be prominent and at the top of the comment letter. The National Park Service will try to honor such requests but may be limited by law.

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PURPOSE AND NEED

The National Park Service (NPS) is considering the construction of additional buildings on an administrative site in Skagway that supports Klondike Gold Rush National Historical Park (KLGO). See figure 2 for a map location of Skagway. The property is bounded by Alaska Street, Main Street, 1st Avenue and 2nd Avenue. It is not part of the national park unit. See figure 3 for a map of the Skagway Historic District which is the park boundary in Skagway. See figure 4 for a map of the project site (Park Collection Storage Building and Maintenance Building Addition) in relation to downtown Skagway.

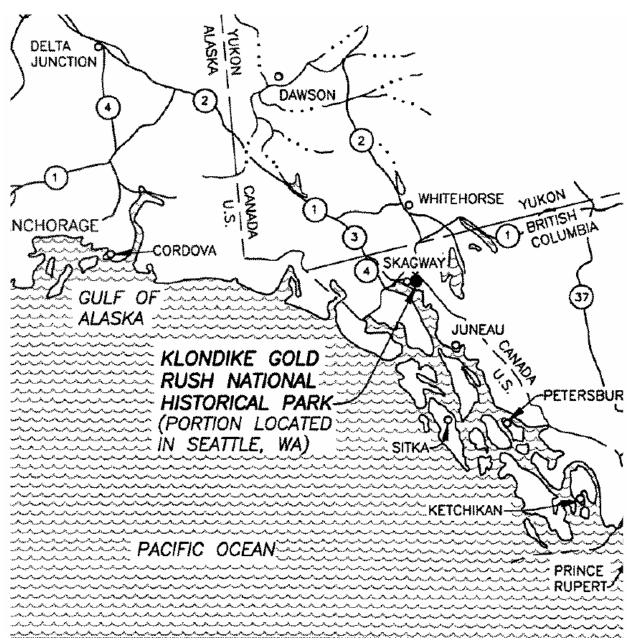


Figure 2. Map Location of Skagway in Southern Alaska

The purpose of the project is to provide better maintenance and storage facilities to support the operations of KLGO. Additionally, the purpose of the project is to provide adequate museum artifact storage for KLGO.

A fully functional maintenance facility is essential for maintaining 15 historic buildings and landscapes, 16 miles of intensely used Chilkoot Trail, employee housing for 28 people and other facilities which allow the park to serve over 700,000 visitors annually. This is the highest visitation experienced by any national park in Alaska.

Available undesignated storage for all park divisions is currently limited to one 1,200 sq. ft. of room which is inadequate for current needs.

Museum artifacts are being stored in conditions that are not temperature or humidity controlled, are scattered in several locations and are not safe from damage or loss. The park archeology collections are being stored in a room that is now desperately needed for office space. About one-third of this collection could be stored in a room that is not climate controlled but secure. The remaining two-thirds of the collection needs to be stored in a secured and climate controlled environment.

At this time, especially with the natural resource inventory and monitoring initiative, many parks in Alaska do not have the space or staff to store and care for their own collections. Many Alaska parks are looking for expanded repositories for storing their collections. This need is becoming critical for the care and use of park collections.

Maintenance supplies, including lumber, pipe and electrical conduit are being stored either outside, exposed to the elements, or in temporary "sea vans" which are unsightly and have been the subject of criticism by park neighbors. Earlier funding for construction of the core building did not allow for a badly needed second bathroom for employees; space for a lunch, training and conference room; a drafting and records room; and other necessary functions.

This environmental assessment (EA) presents and analyzes a "no action alternative," two action alternatives and their associated environmental impacts. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and the regulations of the Council on Environmental Quality (40 CFR 1508.9).

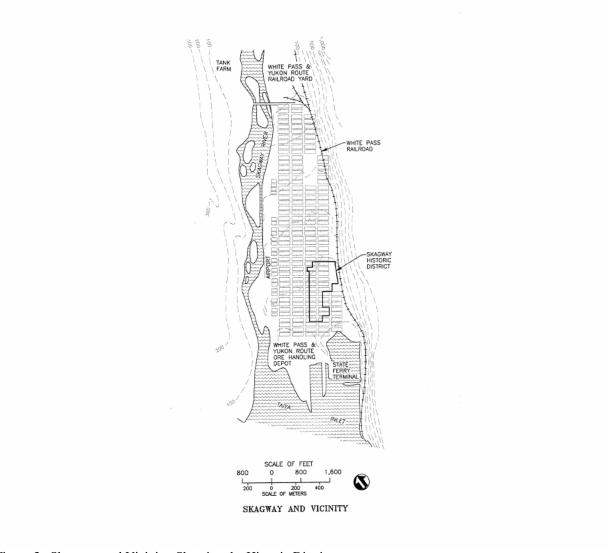


Figure 3. Skagway and Vicinity, Showing the Historic District

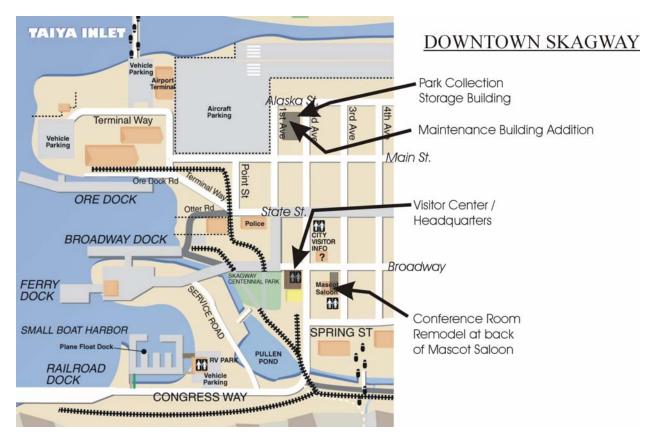


Figure 4. Map of Downtown Skagway showing the Project Area.

Background

Previous Planning:

In 1992 and 1993 the park purchased six lots on Alaska Street between 1st and 2nd Avenue. In 1992 an EA was written which approved the construction of two new maintenance buildings and the rehabilitation of an existing non-historic garage on this administrative site. These were built as a permanent maintenance facility in 1994. In 1996 the park completed a General Management Plan (GMP) with an environmental impact statement. The GMP is expected to provide long-term guidance for park management for at least 10 to 15 years. It addressed the intent to someday add maintenance buildings to the administrative site and the intent to add to the curatorial storage capacity of the park.

Issues and Impact Topics

Natural Hazards:

Tsunamis: The project site is subject to tsunamis. The Alaska Department of Emergency Services and the Pacific Rim Warning Center reference the 50-foot and 100-foot contours as marking the upper limit of potential coastal hazard areas subject to tsunamis. The project site is below the 20-foot contour level. In 1994 Skagway experienced an unusual and fatal tsunami caused by an undersea landslide of the fjord unrelated to any earthquake.

Seismic Activity: The project site is located in the zone of highest earthquake risk. It is so zoned because of the frequency and magnitude of recorded earthquakes.

<u>Cultural Resources</u>: The project site is not within the Skagway Historic District and not within the boundary of KLGO. However, buried cultural resources could occur at the site. An archeological survey was done prior to the 1994 construction of the current maintenance facility at the site (Cooper, 1998). An archeological survey of the site is underway.

<u>Land Use</u>: Construction of additional buildings on the project site could add to and slightly change the mix of land uses on the site and nearby. The project site is an administrative area that is used for maintenance activities. The facilities would add to this existing use. Additional maintenance and other administrative use of the site could affect adjacent residential areas and activities.

Issues Eliminated from Detailed Consideration

<u>Air quality</u>: No effects to air quality would be expected from construction of the buildings. Heavy equipment used for site preparation and for construction activity would be temporary and their air emissions would not be significant. The heating and other utility systems of the new buildings would not yield significant air emissions.

<u>Water Resources and Wetlands</u>: No wetlands or water resources occur on the project site. The buildings' septic system would connect to city sewer and no on site leach field would be built.

<u>Floodplain and Flood Hazard</u>: The project site is not within the 100-year floodplain as per the HUD Flood Insurance Study, 1976.

<u>Coastal Zone Consistency</u>: By definition, federal lands are not within the coastal zone. This project would have no effects to any coastal zone resources.

<u>Vegetation and Wildlife</u>: The project site is an urban city property in Skagway adjacent to the airport. A detailed natural resource survey was not conducted. Vegetation consists of one small shade tree, bushes, weeds and volunteer shrubs growing in unattended corners. Wildlife consists of occasional migratory birds and ground invertebrates. Impacts to native vegetation and wildlife would not be significant.

Threatened and Endangered Species: No threatened or endangered species occur on the project site.

<u>Subsistence</u>: The project site is an urban city block in Skagway adjacent to the airport. It is not used for Alaska rural subsistence activities as defined by ANILCA. See Appendix A of this EA for the ANILCA section 810 subsistence evaluation.

<u>Visitor Experience</u>: The project site is an NPS administrative site, not a visitor use site. It is located away from the visitor use areas of the park and is not in the Historic District. Visitor experience would not be affected by construction on the site.

<u>Impairment of National Park Resources or Values</u>: Since this project site is not within the boundaries of KLGO, no park resources will be affected. The NPS Organic Act of 1916 requires the management of NPS units in a manner that will leave them unimpaired for the enjoyment of future generations. This standard of unimpaired resources does not apply to administrative units outside of park boundaries.

<u>Environmental Justice</u>: Executive Order 12898 requires federal agencies to incorporate environmental justice into their missions by identifying and addressing high and adverse human health or environmental effects in their programs and policies on minorities and low-income populations and communities. None of the project alternatives would result in adverse impacts on minority or low-income populations or communities.

ALTERNATIVES

This EA considers three alternatives – the "no action" alternative, the construction of two maintenance buildings and one curatorial storage building, and the full lot build-out alternative.

Alternative 1: No Action

Under the no-action alternative no additional buildings would be constructed on the project site. The project site is an administrative site of KLGO in Skagway, not within the boundary of KLGO, not within the Historic District, between Alaska and Main Streets and between First and Second Avenues.

The NPS would continue to use the existing maintenance buildings on the site and would continue to store equipment, supplies and materials in various locations. Museum artifacts would continue to be stored in substandard facilities.

Alternative 2: Construct Three Buildings

Under this alternative, the NPS would construct three additional buildings on the NPS administrative site in Skagway located between Alaska and Main Streets and between First and Second Avenues. The NPS would construct a maintenance building (about 1,024 ft²), a museum storage building (about 1,600 ft²) and a storage building with heated and unheated sections (about 1,250 ft²). See figure 5. The museum storage building would be a secure, climate controlled curatorial facility for permanent storage of historic and prehistoric artifacts. None of the buildings would be used for housing or overnight use. Construction would take place during the 2005 building season.

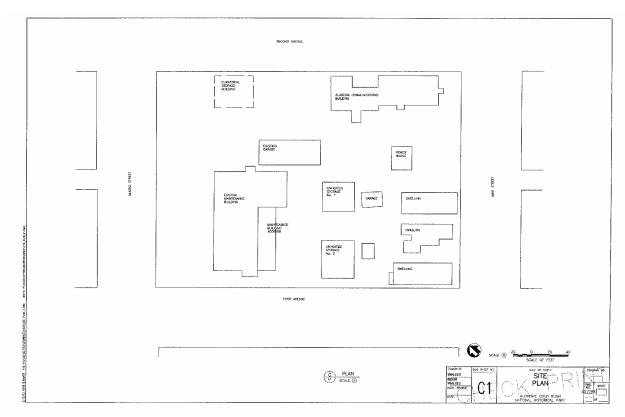


Figure 5. Plan for the NPS Structures

Alternative 3: Full Lot Build-Out

Under this alternative, the NPS would construct three additional buildings on the NPS administrative site in Skagway located between Alaska and Main Streets and between First and Second Avenues. The NPS would construct a maintenance building (about 1,024 ft²), a museum storage building (about 1,600 ft²) and a storage building with heated and unheated sections (about 1,250 ft²). The museum storage building would be a secure, climate controlled curatorial facility for permanent storage of historic and prehistoric artifacts. None of the buildings would be used for housing or overnight use. Construction would take place during the 2005 building season.

The NPS may also construct additional facilities, utilities or structures in support of the maintenance and curatorial functions that exist at the site or other functions that are proposed for the administrative site. The GMP (NPS, 1996) for KLGO also proposes construction of park housing on the site. At this time additional buildings are not planned.

NPS Preferred Alternative

Full lot build-out is the NPS agency preferred alternative because it provides for maximum future construction options.

Environmentally Preferred Alternative

"No action" is the environmentally preferred alternative because it would not include any new construction, land use change, increase in the footprint of development or additional energy or material use.

Mitigation Measures

The following mitigation measures apply to both of the action alternatives. These mitigation measures will also apply to any non-NPS tenants or guests occupying the property.

<u>Cultural Resources</u>: The area of potential effect will be surveyed by professional archeologists using standard archeological techniques prior to construction. All excavation related construction activity (e.g., digging a foundation or utility line) will be monitored by professional archeologists. If unknown or concealed cultural resources are encountered during any construction activity, all necessary steps will be taken to protect the resources discovered and to immediately notify the Cultural Resources Specialist, KLGO, at the park headquarters in Skagway, Alaska. Further work will be suspended until the nature and extent of the newly discovered resources can be determined. Any and all artifacts recovered and any written or photographic documentation associated with this project will be curated at the park according to standard NPS museum practices.

<u>Architectural Compatibility</u>: The design of any building, building addition or facility will be compatible with the neighborhood, the town and the community. The style, color, roof pitch, character, height, placement and design of buildings and facilities will be compatible with the town of Skagway and the character of the neighborhood. Architectural designs will be compatible with Cloyd, Burke and Tabor (1992).

<u>Land Use</u>: Potential development and activities would meet all City of Skagway and State planning and land use regulations and ordinances and the International Building Code for the appropriate seismic zone. The following practices or construction techniques will be required.

- Hazardous substance spills will be cleaned up and remediated following appropriate Federal, State and local statutes and regulations.
- Night lighting will be shielded.
- Additional shade trees will be planted in available spaces.

The following activities or practices will be prohibited on the administrative site.

• Underground storage tanks for fuel, toxic or hazardous materials.

• Open burning or the incineration of garbage.

Alternatives Considered but Rejected

<u>Select a Different Site for the Construction</u>: Different sites in Skagway and elsewhere were considered during project scoping. It was decided that the existing maintenance area was the best location for the buildings. Other NPS-owned sites were considered -- in Skagway, Dyea, Chilcoot Pass, White Pass, Seattle (where a sister unit of KLGO is located) and Anchorage (where the NPS Regional Office is located).

Maintenance functions serve the many NPS historic structures in Skagway and it is advantageous to have a maintenance facility nearby. NPS already owns the land so no new property would need to be acquired. The site is an off-park administrative site, ideally suited for these park-support functions without impacting any in-park resources. A general principal of curatorial collections is that the museum artifact storage should be nearby the primary cultural resource sites in NPS areas.

AFFECTED ENVIRONMENT

The area of potential effect is limited to part of a flat urban city block in the town of Skagway between Alaska and Main Streets and between First and Second Avenues. See figures 5 and 6. The site is currently used for maintenance functions, including carpentry, plumbing, mechanical, welding, auto shop, government vehicle and employee parking, and storage of supplies, material and equipment. The property is owned by the NPS. It is an administrative site for KLGO but it is not within the boundary of KLGO, the Skagway Historic District or a borough.



Figure 6. Aerial View of the Project Site, Looking East over Downtown Skagway

Natural Hazards:

Tsunamis: The project site is subject to tsunamis. The Alaska Department of Emergency Services and the Pacific Rim Warning Center reference the 50-foot and 100-foot contours as marking the upper limit of potential coastal hazard areas subject to tsunamis. The project site is below the 20-foot contour level. In 1994 Skagway experienced an unusual and fatal tsunami caused by an undersea landslide of the fjord unrelated to any earthquake. Other locally-generated undersea landslide tsunamis occurred in 1966 and 1899.

Seismic Activity: The project site is located in the zone of highest earthquake risk because of the frequency and magnitude of recorded earthquakes.

<u>Cultural Resources</u>: The project site is not in the Skagway Historic District. However, an archeological survey, including excavation and recovery, is underway and will precede any project construction activities. Buried historic resources are known to be present, based on archeological investigations conducted by Doreen Cooper (Cooper, 1998). These resources generally date from the gold rush (1897-1898) to the World War II era (1941-1945) although cultural resources up to the present are known. How extensive these resources are in the area to be impacted by construction is unknown at present.

<u>Land Use</u>: The project site is across Alaska Street from the Skagway airport and across First Avenue from the airport airplane parking area. See figure 6. There is a commercial microwave relay tower at one end of the block and two occupied residences at the other end. On the south corner of the block are three private residences. Nearby city blocks have a mixture of residential, industrial and commercial uses. There are no city or borough codes, ordinances or land use zones for Skagway.

ENVIRONMENTAL CONSEQUENCES

The No Action Alternative

<u>Natural Hazards</u>: (Tsunamis and Seismic Activity): Under the no-action alternative, there would be no additional buildings built, so tsunami hazards and earthquake hazards would not increase. The existing buildings at the project site would continue to be used, so tsunami hazards and earthquake hazards would not decrease.

<u>Cultural Resources</u>: Under the no-action alternative, there would be no additional impacts to cultural resources from construction activities other than their continued loss over time to the forces of rust and wood decay. The park's stored museum artifacts would continue to be kept in sub-standard conditions and some deterioration or the artifacts would continue.

<u>Land Use</u>: Under the no-action alternative, new buildings would not be built so land use changes would not occur. The temporary storage containers on the site would continue to be used.

<u>Cumulative Impacts</u>: Under the no-action alternative, cumulative impacts represent past, present and reasonably foreseeable future action that have effects on the project site and the surrounding area. The structures on the project site are two large maintenance buildings, a cement slab and temporary metal shipping containers. The NPS buildings were constructed in about 1994. The development trends in Skagway would not be affected by selection the "no action" alternative. Cumulative effects would be minimal.

<u>Conclusion</u>: The no-action alternative would have no effect on natural and cultural resources. Use of the NPS maintenance facilities on the project site would continue. Land use impacts would not change.

Construct Three Buildings

<u>Natural Hazards</u>: (Tsunamis and Seismic Activity): Under this alternative, three new buildings would be built on the site, but none would be for overnight or housing use. There would be no increased hazard to employees from tsunamis or earthquakes. Park supplies, equipment and museum artifacts would be under reduced hazard because they would be properly stored and secured.

<u>Cultural Resources</u>: Under this alternative, cultural resources would be discovered, artifacts would be recovered and one or more reports would be produced. Cultural artifacts would be added to the park's collections but the site would be damaged by the excavation and construction. Those portions of the site not excavated by testing would potentially still contain buried cultural resources and their loss over time to the forces of rust and wood decay would continue. Museum artifacts would be better protected.

Land Use: Under this alternative, the three new buildings on the project site would be an increase in development to the administrative site. The land use would not change but it would become more concentrated. Zoning would not change and the project would be consistent with any city land use plans. Mitigation measures would reduce adverse effects of the development. Parking congestion could increase as less on-site parking space could be available for employees. Vehicle and machinery noise may increase in time and duration with more facilities and more use of the site. Night lighting of the site could increase even though it would be downwardly directed. The chance of a hazardous spill could increase because of more storage, use of vehicles, transfer of fuels and lubricants and use of curatorial chemicals. Less open space would be present on the site, giving the site a more industrial look.

<u>Consistency with the General Management Plan</u>: This action alternative is consistent with the park's GMP because the GMP directs the construction of both the new maintenance buildings and a new curatorial storage facility. The GMP is somewhat confusing in its Record of Decision where it states that:

Development in Skagway will be limited to structures already owned by the federal government and assigned to the park for restoration and management. No new acquisitions will be pursued except on a willing seller – willing buyer basis. There was a perception that the federal government already owns a sufficient number of structures to carry-out the purposes of the park.

We interpret this limitation on development to apply only to the Skagway Historic District and not to the off-park administrative site. The GMP directs the park to limit development within the boundary of the park in the historic section of Skagway, not to limit the needed administrative facilities on the off-park administrative site that is the subject of this EA.

<u>Cumulative Impacts</u>: The cumulative effects of this action, when combined with existing trends in development in Skagway, would be minimal. The project could add minor traffic congestion to streets near the project site because additional buildings could provide work space for additional employees working on the site and could provide for less on-site parking.

<u>Conclusion</u>: The construction of three new buildings on the project site would have no adverse effects on natural and cultural resources. Land use impacts would be minimal. The facilities would improve the efficiency of KLGO.

Full Lot Build-Out

<u>Natural Hazards</u>: (Tsunamis and Seismic Activity): Under the full lot build-out alternative, three new buildings would be built on the site within the next year, and future buildings or facilities could be constructed on the site as well. Future buildings could be for overnight or housing use. There could therefore be an increased hazard to employees living on the site from tsunamis or earthquakes. Park supplies, equipment and museum artifacts would be under reduced hazard because they would be properly stored and secured.

<u>Cultural Resources</u>: Under this alternative, cultural resources would be discovered, artifacts would be recovered and one or more reports would be produced. Cultural artifacts would be added to the park's collections but the site would be damaged by the excavation and construction. Those portions of the site not excavated by testing would potentially still contain buried cultural resources and their loss over time to the forces of rust and wood decay would continue. Museum artifacts would be better protected.

<u>Land Use</u>: Under this full lot build-out alternative, new buildings on the project site would be an increase in development to the administrative site. The land use would not change but it would become more concentrated. Zoning would not change and the project would be consistent with any city land use plans. Mitigation measures would reduce adverse effects of the development. Parking congestion could increase as less on-site parking space could be available for employees. Vehicle and machinery noise may increase in time and duration with more facilities and more use of the site. Night lighting of the site could increase even though it would be downwardly directed. The chance of a hazardous spill could increase because of more storage, use of vehicles, transfer of fuels and lubricants and use of curatorial chemicals. Less open space would be present on the site, giving the site a more industrial look.

Consistency with the General Management Plan: The full lot build-out alternative is consistent with the parks GMP because, while limitations were placed on NPS acquisition and development within the boundary of KLGO, the administrative site was purchases, developed and managed to support the management of the park. The continued development of the administrative site for this purpose is supported.

<u>Cumulative Impacts</u>: The cumulative effects from the full lot build-out alternative, when combined with existing trends in development in Skagway, would be minimal. The project could add minor traffic congestion to streets

near the project site because additional buildings could provide work space for additional employees working or living on the site and could provide for less on-site parking.

<u>Conclusion</u>: The full lot build-out of the project site would have no adverse effects on natural and cultural resources. Land use impacts would be minimal. The facilities would improve the efficiency of KLGO.

CONSULTATION AND COORDINATION

The following people contributed to this EA by participating in the interdisciplinary team to develop the project, alternatives, scope, development concept, planning, impacts analysis, resource surveys or issues identification.

• Mike Amiotte Chief of Maintenance, KLGO

Dick Anderson Environmental Protection Specialist, AKSO, lead preparer

• Karl Gurcke Historian, KLGO

Meg Hahr
 Natural Resource Program Manager, KLGO

• Glenn Lamoree Project Manager, Denver Service Center

• Bruce Noble Superintendent, KLGO

• Debbie Sanders Museum Curator, KLGO

• Theresa Thibault Chief of Resource Management, KLGO

• Glen Yankus Environmental Protection Specialist, AKSO

The EA is being sent to potentially affected or interested individuals, groups, organizations and agencies.

REFERENCES

Cloyd, Paul, Steve Burke and Mark Tabor. 1992. Design Guidelines for the Klondike Gold Rush Maintenance Facility. Denver, CO: National Park Service.

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APPENDIX

SUBSISTENCE DETERMINATION

for Section 810(a) of the Alaska National Interest Lands Conservation Act

I. Introduction

This evaluation and finding was prepared to comply with Title VIII, section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It evaluates the potential restrictions to subsistence uses which could possibly result from the proposed development of an administrative parcel in the City of Skagway, Alaska.

II. The Evaluation Process

Section 810(a) of ANILCA states:

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

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

Klondike Gold Rush National Historical Park (KLGO) was not created by ANILCA.

The potential for significant restriction must be evaluated for the proposed action's effect upon "subsistence uses and needs, the availability of other lands for the purposes sought to be achieved and other alternatives which would reduce or eliminate the use." (Section 810(a), ANILCA).

III. Proposed Action on Federal Lands

KLGO is considering the construction of new buildings on an administrative site in Skagway between Alaska and Main Streets and between First and Second Avenues.

The environmental assessment, Construction of Maintenance and Curatorial Facilities in Skagway, Alaska for Klondike Gold Rush National Historical Park, describes three

alternatives – no action, construct three buildings and the full lot build-out (*the preferred alternative*) – in detail.

Alternative 1: No Action

Under the no-action alternative no new buildings would be constructed on the project site.

Alternative 2: Construct Three Buildings

Under this alternative, three new buildings would be constructed on the project site.

Alternative 3: The Full Lot Build-out (the preferred alternative)

Under the full lot build-out alternative the project site would be cleared for future buildings, additions, expansions and facility development without the need for additional environmental review. Mitigation measures designed to prevent any off-site impacts would be followed.

IV. Affected Environment

A summary of the affected environment pertinent to subsistence uses is presented here.

The proposed development site is located within the City of Skagway. Current regulations prohibit the discharge of firearms within the City of Skagway. Federal subsistence regulations do not apply to State or private lands.

Section 803 of ANILCA defines subsistence uses as:

the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of non-edible by-products of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade.

ANILCA and National Park Service (NPS) regulations authorize subsistence use of resources in all Alaska national parks, monuments and preserves with the exception of Kenai Fjords National Park, Glacier Bay National Park, Katmai National Park, Klondike Gold Rush National Historical Park, "old" Mount McKinley National Park, and Sitka National Historical Park (Codified in 36 CFR part 13, Subparts A, B, and C). Consequently there are no Federal subsistence open seasons for wildlife harvest within KLGO.

In accordance with Title VIII of ANILCA, subsistence uses are allowed on adjacent federal public lands within Tsongas National Forest. Federal regulations allow qualified rural residents to use fish and wildlife population for subsistence purposes on USDA National Forest and US Fish and Wildlife Service lands.

The region's subsistence resource harvest activities include hunting, trapping, fishing, marine mammal harvest, digging for clams, catching shellfish, gathering firewood, berries, wild plants and bird eggs. Historical resource utilization patterns, such as fish camps or communal hunts, are linked to traditional social and subsistence use patterns. Sharing of resource occurs between communities, as well as within communities throughout the region.

Some of the major resources used for subsistence are black bear, brown bear, moose, mountain goat, beaver, snowshoe hare, fox, lynx, mink, wolf, wolverine, ptarmigan, waterfowl, otter, marine mammals, salmon, trout, halibut, crab, clams, berries, wild edible plants and wood resources.

The Klondike Gold Rush National Historical Park, General Management Plan, 1996, documents additional description of the affected subsistence environment of the region.

The NPS recognizes that patterns of subsistence activity vary from time to time and from place to place depending on the availability of wildlife and other renewable natural resources. A subsistence harvest in a given year may vary considerably from previous years because of weather, migration patterns and natural population cycles.

V. Subsistence Uses and Needs Evaluation

Potential Impacts to Subsistence Users

To determine the potential impacts on existing subsistence activities for the preferred alternative, three evaluation criteria were analyzed relative to existing subsistence resources.

- the potential to reduce important subsistence fish and wildlife populations by (a) reductions in number, (b) redistribution of subsistence resources, or (c) habitat losses;
- what affect the action might have on subsistence fisherman or hunter access;
- the potential for the action to increase fisherman or hunter competition for subsistence resources.
- 1. The potential to reduce populations:
 - (a) Reduction in Numbers: The preferred alternative (Alternative 3) is not expected to manipulate subsistence habitats or result in any measurable reduction in or redistribution of wildlife or other subsistence resources. Provisions of ANILCA, Federal Subsistence Board, USDA Forest Service, Fish and Wildlife Service and NPS regulations provide the tools for adequate protection of fish and wildlife populations within region while ensuring a subsistence priority for local rural residents. In addition, the Federal managers may enact closures and/or restrictions if necessary to assure the continued viability of a particular fish or wildlife population.
 - (b) Redistribution of Resources: The preferred alternative is not expected to cause a significant disturbance to habitat thereby reducing certain subsistence wildlife resources.
 - (c) Habitat Loss: The preferred alternative (Alternative 3) is not expected to significantly impact critical habitat for moose, furbearers, waterfowl and other subsistence resources.

2. Restriction of Access:

The preferred alternative is not expected to significantly change regional subsistence use patterns. Access for subsistence uses within National Forest Service and US Fish and Wildlife Service areas are granted pursuant to ANILCA, sections 811(a)(b) and 1110(a). ANILCA allows access within KLGO by certain specified means, including motorboats, for traditional activities.

3. Increase in Competition:

The preferred alternative is not expected to result in an increase in competition for subsistence resource on federal public lands, which are open to eligible subsistence users. Federal regulations and provisions of ANILCA mandate that if and when it is necessary to restrict taking of fish or wildlife subsistence users are given a priority over other user groups. Continued implementation of the ANILCA provisions should mitigate any increased competition from resource users other than subsistence users. Federal managers may enact restrictions if necessary to protect the continued viability of a particular fish or wildlife population.

VI. Availability of Other Lands

The preferred alternative is consistent with NPS mandates and is an update to the KLGO General Management Plan.

VII. Findings

This analysis concludes that the preferred alternative would not result in a significant restriction of subsistence uses.