



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

**Wrangell-St. Elias National Park and Preserve
Alaska**

**FINDING OF NO SIGNIFICANT IMPACT
Snag Creek/Kuskulana Land Exchange**

Recommended:

Ben Bobowski
Superintendent, Wrangell-St. Elias National Park and Preserve

26 July 2017
Date

Approved:

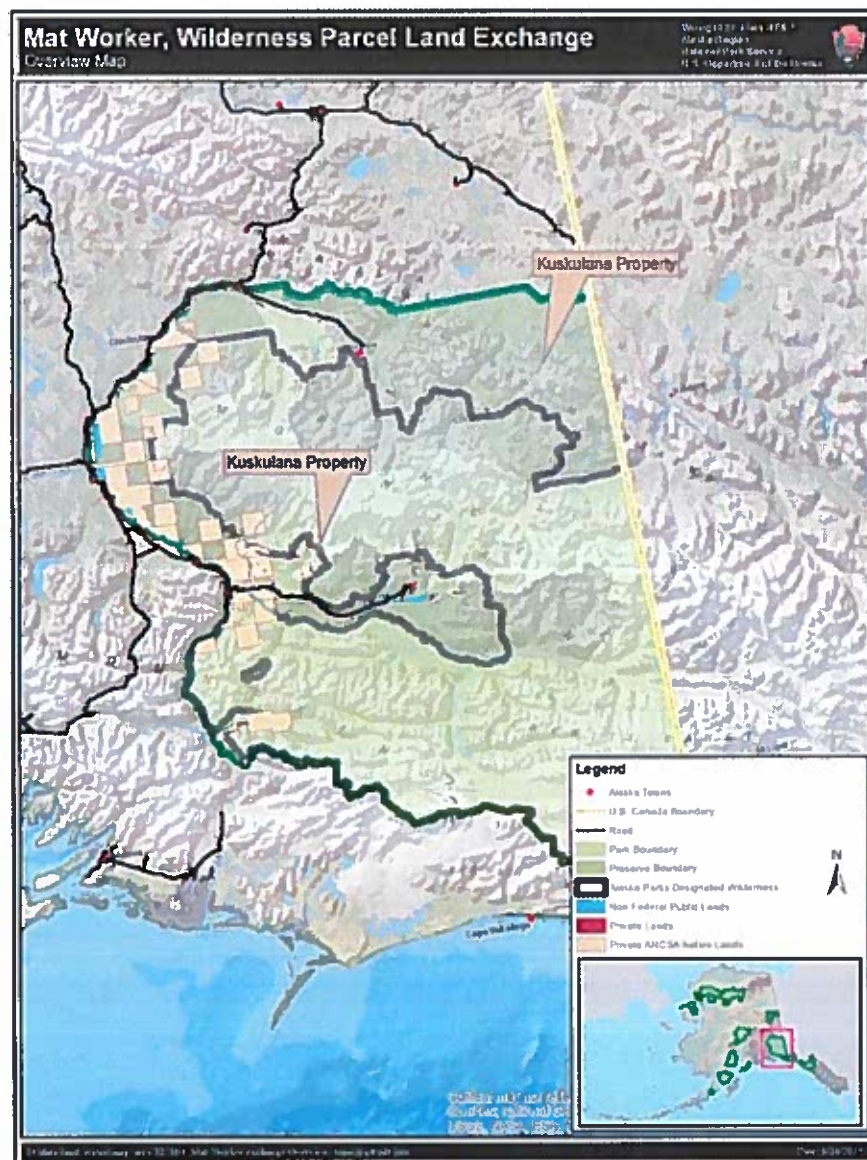
Herbert C. Frost
Regional Director, Alaska, National Park Service

Date

INTRODUCTION

In compliance with the National Environmental Policy Act of 1969 (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with a land exchange proposed by Mr. Mat Worker. Mr. Worker is the owner of two private parcels within WRST. The two parcels he owns are at the Kuskulana Glacier in designated wilderness and in the Snag Creek drainage northeast of Chisana. Mr. Worker proposes to exchange the Kuskulana parcel for land adjacent to his Snag Creek parcel. The exchange would facilitate reasonable fly-in access to the Snag Creek parcel. Under the proposal, NPS would acquire the mineral estate to the Kuskulana parcel and retain the mineral estate on the Snag Creek parcel.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.



ALTERNATIVES CONSIDERED

The EA provided an overview of the proposed project and analyzed two alternatives and their impacts on the environment: Alternative A, the No Action Alternative; and Alternative B, the Proposed Action with NPS stipulations.

Alternative A: No Action Alternative

Under this alternative, the NPS would not proceed with the land exchange and Mr. Worker would continue to own both parcels of land. An existing and washed-out airstrip at Snag Creek would continue to be the sole means of access to Mr. Worker's Snag Creek property.

Alternative B: Improvement of Existing Airstrip at Snag Creek

Under this alternative, the NPS would not proceed with the land exchange and Mr. Worker would continue to own both parcels of land. NPS would permit Mr. Worker to make improvements to the existing airstrip on NPS land in the floodplains of Snag Creek. These improvements would consist of lengthening of the existing washed-out airstrip and diversion structures to minimize the potential for future flooding.

Alternative C: Proposed Action (NPS Preferred Alternative)

Under this alternative, the NPS would exchange a parcel of equal-value land adjacent to Mr. Worker's Snag Creek parcel in exchange for acquisition of the Kuskulana wilderness parcel. Mr. Worker would likely proceed to construct an airstrip on the conveyed land at Snag Creek, utilizing hand tools, a motorized brush-cutter, and chain saws. The airstrip would be approximately 1,200 feet in length and cleared to a 20' width, with brushing extending another 20' on either side. In the exchange, the NPS would include a deed restriction on the Snag Creek parcel conveyed to Mr. Worker. The deed restriction would include provisions for prevention of future subdivision as well as restrictions to protect visual resources.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

The NPS has selected Alternative C (the Proposed Action) because it best meets the purpose and need as expressed in the Environmental Assessment. The land exchange will provide adequate and feasible access to inholdings per Section 1110(b) of the Alaska National Interest Lands Conservation Act (ANILCA) of 1980. Mr. Worker has struggled to reasonably access his property at Snag Creek. Fixed wing access is currently un-safe and overland access of any kind would result in resource impacts from trail use or construction. As important, Alternative C would result in NPS acquisition of a remote wilderness parcel. Retention of this property in private ownership could result in impacts to wilderness character from access and/or development. Remote wilderness parcels are listed as the top priority in the 1986 WRST Land Use Plan.

No public access to the Snag Creek area will be lost as a result of this decision. Any airstrip constructed by Mr. Worker on private land would be for private use. The unmaintained airstrip on Snag Creek would remain in place, and there is an alternative airstrip available to the public at the McDonald airstrip, approximately 4 miles upstream.

Alternative C will result in no significant adverse impacts to natural or cultural resources. The proposed land exchange is expected to have low-level direct and indirect impacts to vegetation, soils, visual resources, and visitor use and experience. There would be no effect on floodplains. There would be beneficial effects on cultural resources and wilderness.

MITIGATION MEASURES

A complete description of the deed restrictions for the conveyed land is provided below:

1. The property shall not be subdivided, divided, or defacto subdivided and shall be sold, leased, or otherwise conveyed only in its entirety.
2. Structures (excluding antennas) shall not exceed a height of 35 feet measured from the natural grade of the land to the highest point of the structure. Antennas or wind turbines shall not exceed a height of 50 feet as measured from the natural grade of the land to the highest point of the structure.
3. Roofs, exterior siding, plumbing vent pipes, chimneys, drain gutters, downspouts, and other exterior materials and fixtures, except windows, shall be constructed of non-reflective material and painted or maintained with earth-tone colors found in the surrounding environment. Use of native materials such as wood and stone is encouraged. Solar panels, photovoltaic cells, wind turbines and other forms of alternative energy production/collection would not be subject to this restriction.

PUBLIC INVOLVEMENT/AGENCY CONSULTATION

Public scoping occurred in December of 2015. A scoping letter was sent out and a public notice was published in the Copper River Record and Mukluk News (Tok). One comment was received from the local sport hunting concession operator, in opposition to the land exchange. The EA was placed on the NPS Planning, Environment and Public Comment (PEPC) website on May 1, 2017, where it was available for public review and comment through May 30, 2017. Notice of the EA's availability was published in two local newspapers (Tok and Glennallen), and e-mailed to individuals in Fairbanks, Tok, and Anchorage. Seven comments were received, six are in support of the land exchange and one is opposed. No changes to the EA were suggested in the comments.

FINDING OF NO SIGNIFICANT IMPACT

As described in the EA, the selected alternative will not have a significant effect on the human environment. As described in the EA and summarized below, the selected alternative has the potential for adverse impacts on soils, vegetation, visual resources, and visitor use and experience; however, no potential for significant adverse impacts was identified.

- **Cultural Resources:** The selected alternative will have an overall positive impact on cultural resources. Surveys indicate no cultural resources at the site of the proposed airstrip; NPS acquisition of the Kuskulana property would enable protection of cultural resources that exist there.
- **Floodplains:** No impacts would occur.
- **Soils:** The land exchange and proposed airstrip construction would result in less than one acre of disturbance to soils, which typically consist of a thin surface organic layer covering gravelly sands and sandy loams.
- **Vegetation:** There would be cutting or removal of 2.75 acres of vegetation. Approximately 65 mature trees would be removed, including white spruce and poplar species.
- **Visual Resources:** Impact would result from introduction of a linear feature (airstrip) in a previously undisturbed area.

- **Visitor Use and Experience:** Both areas (Snag Creek and Kuskulana) receive very little visitor use. Opportunities for solitude or unconfined recreation in the Kuskulana area would increase while the human footprint in the Snag Creek area would likely grow.
- **Wilderness:** Under Alternative C, 39.9 acres of designated wilderness would be added and protected in WRST in exchange for the elimination of approximately 39 acres of eligible wilderness.

The selected alternative will not have significant effects on public health and safety, or rare or unique resources 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 NPS selected alternative will not violate any federal, state, or local environmental protection law. The environmental effects of other reasonably foreseeable activities in the area are discussed in the cumulative effects portion of the environmental assessment. No cumulative effects are significantly adverse.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

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

Non-Impairment Finding

A determination of non-impairment is made for each of the resource impact topics carried forward and analyzed in the environmental assessment for the preferred alternative. The park's 2010 Foundation Statement was used as a basis for determining if a resource is:

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

An impairment determination is not provided for visitor use and experience or wilderness because impairment determinations relate back to park resources and values. These impact areas are not considered to be park resources or values subject to the non-impairment standard (see NPS 2006 Management Policies 1.4.6).

Cultural Resources

Protection of cultural resources is not specifically identified as one of the park's purposes in the establishing legislation of the park. The park's general management plan does identify cultural resources as a significant resource and protection of cultural resources would be key to the natural or cultural integrity of the park.

Alternative C would result in benefits to cultural resources because of the acquisition of the Kuskulana property and protection of the cultural resources there (historic mining). Alternative C would result in direct and cumulative, long-term positive impacts to cultural resources and would not result in impairment to cultural resources.

Floodplains

Management for floodplains is not specifically identified as a purpose in the establishing legislation of the park and floodplains are not specifically identified in the park's general management plan as being of significance. Floodplains are a key component to "continuous intact ecological communities that create visually diverse scenery largely unaffected by humans," which is identified as a significance statement for Wrangell-St. Elias National Park and Preserve. Alternative C would not result in any impacts to floodplains.

Soils

Management for soils is not specifically identified as a purpose in the establishing legislation of the park and soils is not specifically identified in the park's general management plan as being of significance. Alternative C would result in impacts to soils of less than 1 acre and would not result in impairment.

Vegetation

Management for vegetation is not specifically identified as a purpose in the establishing legislation of the park and vegetation is not specifically identified in the park's general management plan as being of significance. Vegetation is a key component to "continuous intact ecological communities that create visually diverse scenery largely unaffected by humans," which is identified as a significance statement for Wrangell-St. Elias National Park and Preserve. Alternative C would result in impacts to vegetation of approximately 2.75 acres, including approximately 65 mature trees of mostly white spruce and poplar species, and would not result in impairment.

Visual Resources

"To maintain unimpaired the scenic beauty and quality of high mountain peaks, foothills, glacial systems, lakes and streams, valleys, and coastal landscapes in their natural state" is identified as a park purpose. Expansive vistas and scenic wildlands are identified as significant resources that define what is most important about the park's resources and values and are tied to the park purpose. Unimpaired scenic quality is necessary to fulfill the purposes for which the park was established and is key to the natural integrity of the park.

Construction of a new airstrip would result in a linear feature that would be visible from the air, but not visible to visitors on the ground. Impacts will not result in impairment to visual resources.

Conclusion

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of Alternative C.

