EXECUTIVE SUMMARY

The National Park Service (NPS) is considering alternatives for managing subsistencerelated off-road vehicle use in the Cantwell Traditional ORV Use Area (TUA) of Denali National Park and Preserve (see Figure 1.1). In this environmental assessment (EA), the NPS analyzes four management alternatives and their impacts on the environment.

Purpose of Action

In July 2005, the NPS published the final "Cantwell Subsistence Traditionally Employed Off-Road Vehicle Determination" which opened the entire 32,159 acre Cantwell traditional ORV use area (TUA) to the use of off-road vehicles (ORVs), for subsistence purposes by NPS qualified subsistence users. The NPS is proposing this current action to assure subsistence ORV use in this area is proactively managed to minimize adverse impacts to the resources and values for which the park was established while also providing reasonable access for subsistence purposes. Along with the 2005 Determination, this action would amend the General Management Plan for Denali (GMP).

Need for Action

The 1980 Alaska National Interest Lands Conservation Act (ANILCA) authorizes subsistence uses where traditional in the ANILCA additions of Denali National Park (Denali park additions) by local rural residents. ANILCA also provides for reasonable access with methods of surface transportation traditionally used for subsistence purposes.

The NPS determined in the 1986 Denali General Management Plan (GMP) that ORVs had not been regularly used for subsistence purposes and were not considered a traditional means of subsistence access. The GMP determination was based on existing information and applied on a park-wide basis. However, the GMP also provided that in the future, as additional information became available, the park would review traditional means of subsistence access on a case by case basis.

In the 1990's, eight Cantwell subsistence users and the Denali Subsistence Resource Commission (SRC) requested that the Superintendent review and reconsider the 1986 GMP determination in light of new information provided by Cantwell residents regarding their traditional use of ORVs for access to subsistence resources. Specifically, in a September 29, 1996 letter to the NPS, the Denali SRC made the following recommendation:

"Access should be allowed at the same level as 1980, with reasonable allowances for restrictions to preserve the environment. At Denali for instance, people in the Cantwell resident zone have used ORVs traditionally; an examination of access routes suggests that in some areas, because of lack of vegetation and presence of a harder, less-eroding surface, ORV use for retrieval of moose meat from subsistence hunting should be permitted. It is understood that the situation would be monitored and if a detrimental change to the environment should result from ORV use, the permission to use ORVs would be suspended. It was also suggested that a trial period, perhaps of one hunting season, with restrictions (to mapped routes, etc.), be opened to determine the advisability of continuing the ORV use."

In response to these requests, and in compliance with ANILCA and NPS regulations and policies, the NPS undertook a project to compile and review traditional access information for the Cantwell area. The scope of this review and report was limited to the Cantwell area because the request was specific to that community and adjacent Denali National Park lands regarding traditional subsistence ORV access for the Cantwell area.

On July 22, 2005, the NPS published a final "Cantwell Subsistence Traditionally Employed ORV Determination" (NPS 2005d) in which it determined that the community of Cantwell had used ORVs for successive generations for subsistence purposes in portions of the Denali Park additions before the establishment of the Denali National Monument in 1978 (again, see Figure 1.1). Such use is subject to the provisions of 36 CFR 13.46, 50 CFR Part 100, and other applicable laws and regulations (see "Laws, Regulations, and Policies" for more information).

In both August 2005 and August 2006, the NPS implemented a temporary 120-day closure to protect park resources in the area where Cantwell residents traditionally employed ORVs for subsistence purposes that was identified in the Determination. To allow ORV access for subsistence, three existing trails were exempted from the closure: the 1) the one mile long Windy Creek Trail from the park boundary to the top of the ravine leading down to Windy Creek, including the 0.5 mile long spur trail that leads to the west/southwest from the ravine. 2) the northern portion of the old roadbed that extends southwest from the Cantwell Airstrip, for approximately one mile to the top of a little knoll, and 3) the Cantwell Creek Trail, which encompasses the gravelly part of the floodplain of Cantwell Creek for about 3 1/4 miles within the park downstream of the wilderness boundary, including the section that re-enters the park near Pyramid Peak. (See Figure 1.2.)

The closure allowed reasonable access to subsistence resources for NPS qualified subsistence users while protecting park resources and also giving the NPS time to complete the necessary field work and environmental documentation evaluating ORV effects on park resources and values. The necessary field work has been completed and the environmental documentation is presented in this EA.

Impact Topics Evaluated

To focus the environmental assessment, the NPS selected the following impact topics for further analysis:

- Soils
- Vegetation, Including Wetlands

- Wildlife,
- Water Resources
- Visitor Experience
- Wilderness
- Subsistence Opportunities

Alternatives

Four alternatives for managing subsistence ORV use in the 32,159 acre Cantwell Traditional Use Area (TUA) were considered (see Table 2.3, in Chapter 2, Alternatives). Management alternatives were developed with input from the State of Alaska, the Denali Subsistence Resources Commission and other members of the public.

The four alternatives evaluated were:

<u>Alternative 1 (No Action).</u> Under this alternative, the TUA would remain open to ORV use by NPS qualified subsistence users for all subsistence purposes. This No Action Alternative is a required alternative under the 1969 National Environmental Policy Act.

<u>Alternative 2.</u> Under this alternative, the TUA would remain open to off-trail ORV use by NPS qualified subsistence users only by permit for retrieval of subsistence harvested moose or caribou. ORV use for all subsistence purposes would be authorized on the new Bull River Access Trail and on several NPS-managed existing trails and routes (the Windy Creek Access Trail, Windy Creek Bowl Trail, Cantwell Airstrip Trail, Pyramid Peak Trail, the Upper Cantwell Creek Floodplain Trail/Route, and the Bull River Floodplain Trail/Route). Certain closures would apply.

<u>Alternative 3.</u> Under this alternative, ORV use for all subsistence purposes would be authorized *only* on the new Bull River Access Trail and on several NPS-managed existing trails and routes (the Windy Creek Access Trail, Windy Creek Bowl Trail, Cantwell Airstrip Trail, Pyramid Peak Trail, the Upper Cantwell Creek Floodplain Trail/Route, and the Bull River Floodplain Trail/Route). Certain closures would apply. A winter subsistence moose hunt would be possible.

<u>Alternative 4.</u> This alternative would be the same as Alternative 3, except the NPS would not construct the new Bull River Access Trail or allow ORV use on either the Bull River Floodplain or the Upper Cantwell Creek Floodplain. The NPS would authorize ORV use for subsistence purposes on NPS-managed trails *only* from one week before the beginning of the fall moose and caribou hunting seasons through to the end of these hunting seasons.

Environmental Consequences

Following the alternatives is an analysis of the environmental consequences of the actions in each alternative. This analysis evaluates the magnitude of impacts and how these impacts compare to current conditions. The cumulative impact assessment outlines overall impacts resulting from past, current, propose, and reasonably foreseeable future management and other actions. The analysis is intended to guide the decision-maker in choosing a management action based on an objective understanding of environmental consequences.

These environmental consequences are analyzed in Chapter 4 and summarized in Table 2.4, which appears at the end of Chapter 2. Conclusions for each alternative may be stated as follows.

Alternative 1 (No Action)

Unlimited ORV use for subsistence purposes across the Traditional Use Area would result in moderate to major adverse impacts to most of the topics analyzed (the exception being water resources for which minor adverse impacts are predicted). Most affected would be soils, vegetation, wildlife, wilderness, subsistence opportunities, and park operations. For soils and vegetation, major impacts would be widespread and difficult to predict, but over the long term could result in degradation on significant areas within the 32,159 acre TUA, with most impacts occurring on 2,900 acres of flat and open terrain. There would be major adverse impacts on moose in the Cantwell TUA because levels of harvest would increase dramatically over the current average. Alternative 1 would cause major adverse impacts on wilderness resources because the lack of proactive management would result in two important wilderness resource values, presence of natural conditions and opportunities for solitude, being compromised by the perpetuation of existing damage and the expansion of many miles of new ORV trails throughout the TUA. The level of these adverse impacts would necessitate the re-designation of the current status of the TUA from eligible for wilderness designation to one of ineligible. Actions in this alternative would have major negative impacts on subsistence opportunities because subsistence moose hunting, facilitated by unrestricted ORV access, would be above a sustainable level in the TUA. The level of impacts to subsistence anticipated from this alternative would eventually result in a significant restriction to subsistence resources (primarily moose).

The major adverse impacts on soils, vegetation, wildlife, and wilderness would lead to impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.

Alternative 2

Limited ORV use for subsistence purposes both off-trail and on NPS-managed trails and routes in the Traditional Use Area would result in minor to major adverse impacts to the topics analyzed. Soils, wildlife, water resources, and visitor experience would all be adversely impacted to a minor to moderate degree under this alternative. Actions in this alternative would have a major impact on vegetation (including wetlands) and wilderness in the Cantwell TUA because of widespread long-term ORV use in many areas of the TUA.

There would be minor beneficial effects to subsistence resources and opportunities because of extensive ORV access and proactive wildlife management that would provide for sustainable harvest over the next 10-15 years.

Were impacts on vegetation (including wetlands) to reach the upper levels, these impacts would result in impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.

Alternative 3

Limited ORV use for subsistence purposes only on NPS-managed trails and routes in the Traditional Use Area, plus a possible winter subsistence moose hunt, would result in moderate adverse impacts on soils, vegetation, wildlife, and wilderness. Water resources and visitor experience would be subject to minor to moderate adverse impacts.

There would be minor beneficial effects to subsistence resources and opportunities because of improved ORV access and proactive wildlife management that would provide for sustainable harvest over the next 10-15 years.

Alternative 3 would not cause impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.

Alternative 4

Alternative 4 would allow for the most limited ORV use for subsistence purposes in the TUA. This alternative would have negligible to minor adverse impacts on soils, vegetation, wildlife, water resources, and visitor experience. There also would be minor adverse impacts on subsistence opportunities, primarily because access would be more difficult (however, a winter hunt would provide additional subsistence opportunities).

The actions in this alternative would result in overall moderate benefits to wilderness resource values, largely due to the elimination of ORV trails, routes, and dispersed ORV travel. There would be major improvements to the presence of natural conditions and solitude due to the recovery of large areas of impact and a reduced scope of motorized use.

Alternative 4 would not cause impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.

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