



# Relocate Section of Portage Creek Trail

## *Environmental Assessment*

*July 2019*





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural and cultural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to assure that their development is in the best interests of all. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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Buck Mangipane  
Lake Clark National Park and Preserve  
240 W 5<sup>th</sup> Avenue, Suite 236  
Anchorage, Alaska 99501

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## **ON THE COVER**

Portage Creek Trail, Lake Clark National Park, Alaska.  
NPS Photo

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# **1 Proposed Action**

The National Park Service (NPS) proposes to relocate up to 1.4 miles of the Portage Creek Trail in Lake Clark National Park and Preserve.

## **2 Purpose and Need**

The purpose of this action is to provide public, pedestrian trail access, while avoiding trespass issues on private lands (Figure 1). The Portage Creek Trail is presently routed through 2 private parcels, but there is not a legal easement for public access. The upper segment of the trail provides access to alpine tundra in the upper Portage Creek basin that is conducive to hiking and camping.

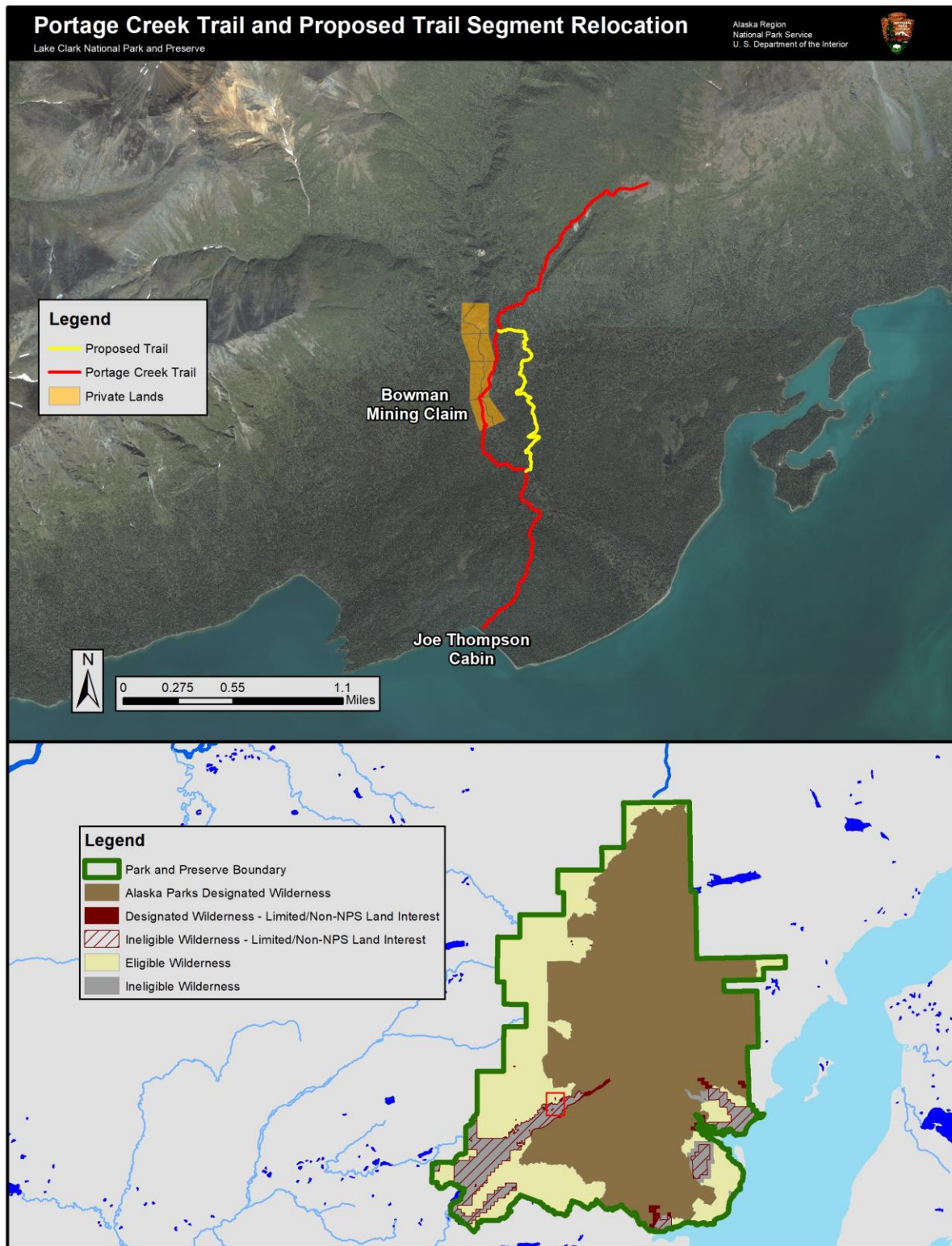
## **3 Background**

The Joe Thompson Cabin (Figure 1) and Portage Creek Trail are located on the north shore of Lake Clark, about 1 mile west of the Portage Creek outlet. The Joe Thompson Cabin is the starting point for a 3.2 mile trail that has historically connected to the Bowman Mining Claim along Portage Creek, mining claims beyond the camp, and the alpine tundra northeast of the mining claims. This trail has recently been called the Joe Thompson Trail, but historical records document the Dena'ina place name as the Portage Creek Trail (Ellanna 1986). This area has been used as a portage by the Dena'ina people, connecting Lake Clark to Lachbuna Lake.

In 2010, the NPS restored the Joe Thompson cabin and in 2012, completed some minor brushing and minimal tread work on the southern section of NPS trail. The upper 1.4 miles of trail is currently inaccessible to visitors without trespass on private lands or off-trail travel around the private parcels. The cabin is currently used for administrative purposes only.



Figure 1. Location of Portage Creek Trail in Lake Clark National Park and Preserve



## 4 Issues

### Issues Selected for Detailed Analysis

The following issues are evaluated for each alternative:

**Recreation and Land Status:** The current trail bisects multiple private parcels which inhibits recreational access to the north segment of the trail. Relocating the trail segment would provide improved access to the upper 1.4 miles of trail for recreational purposes and eliminate trespass occurring with use of the existing trail.

**Subsistence:** The existing trail location impedes subsistence access to resources found at higher elevations in the drainage. Relocation of the trail segment could improve access for subsistence users to areas where sought after subsistence resources are found.

**Vegetation and Soils:** The vegetation and soils of the project area have been minimally modified by development. Relocation of the trail segment would directly remove approximately 1 acre of vegetation and modify soils within the proposed trail route. Impacts could include a reduction in plant cover, simplification of the vegetation structure, compaction of soils, and alteration of the habitat for plant growth.

**Wilderness:** The proposed project area is located in an area considered eligible for designation as wilderness. Trail work and increased visitation could impact the wilderness character, including solitude and undeveloped qualities.

### Issues Considered but Dismissed

The following issues were identified, considered, and dismissed from further analysis:

**Air Quality, Climate Change, Water Resources, and Wildlife, Viewshed (Natural, Aesthetic, and Scenic Values), and Natural Soundscape:** The proposed action would not result in substantial change to these resources. The proposed project area is small and the actions and subsequent use would not generate emissions to degrade air quality or contribute to climate change. Water resources would not be affected by the proposed project or future trail use, as trail design would ensure proper drainage. The wildlife habitat type is common in the area; alteration of an estimated 1 acre of habitat and associated displacement of wildlife would not have an impact on local wildlife populations. The overstory is dense and would remain intact, limiting potential impacts to the viewshed. Outside of the brief period of construction, the expected increase in human use of the trail would not change the natural soundscape.

**Cultural Resources:** LACL conducted Phase I archeological testing for the proposed reroute and consulted with the State Historic Preservation Office (SHPO), per Section 106 of the National Historic Preservation Act. LACL requested SHPO concurrence on a finding of “No Historic Properties Affected” (Letter to SHPO July 3, 2019). During project implementation, if tread work exposes cultural resources, work will be stopped and archaeological testing will be conducted.

Other cultural resources associated with the existing trail include the Joe Thompson Cabin and the Bowman Mining Camp (XLC-0089). In 2009, the Joe Thompson cabin was determined ineligible for listing on the National Register of Historic Places (NRHP) by the NPS and concurred with by the SHPO. A draft Determination of Eligibility for Bowman Mining Camp as a locally significant resource was written in 1992, but was never finalized since the mine and associated features are on private property and the owners do not support its listing.

The park is in the process of working with the SHPO to determine the trail's eligibility for listing on the NRHP for its use as a traditional route between Lake Clark and Lachbuna Lake. There is evidence for this use from oral histories and placenames. The trail's potential eligibility from its association with the historic mines is more tenuous since the Joe Thompson Cabin is ineligible and the Bowman Mining Camp, even if it met the NRHP criteria, will not be listed against the landowners' wishes. In the event that the trail is determined eligible for listing for either association, the addition of the re-reroute will not be an adverse effect. The reroute does not physically change the historic trail, it only abandons the section that crosses private property. The section of the trail that crosses private property is not currently maintained as a trail by the landowners

**Floodplains and Wetlands:** The proposed trail relocation would occur outside of the area adjacent to Portage Creek that is defined as Riverine Wetland by the United State Fish and Wildlife Service National Wetland Inventory data.

**Threatened and Endangered Species:** No federally designated threatened or endangered species are known to occur within the project area.

## 5 Alternatives

This section describes a No Action alternative and the action alternative.

### Alternative 1: No Action

Under the No Action alternative, the NPS would not relocate up to 1.4 miles of the Portage Creek Trail. Access to the upper 1.4 miles of trail would require off-trail travel or route finding to avoid trespass on private lands.

### Alternative 2: Relocate segment of Portage Creek Trail (Proposed Action and Preferred Alternative)

Relocate up to 1.4 miles of the Portage Creek Trail onto NPS lands (See Figure 1). This would provide public, pedestrian access via a continuous 4.2-mile trail to the alpine tundra in the upper Portage Creek Basin and opportunities for access to Lachbuna Lake.

The proposed trail segment would be 2 feet wide with a 2-foot wide brushed area on each side removing undergrowth to facilitate hiking (total width of 6 feet). The route would follow a sustainable grade east of the existing trail with a vegetative buffer to minimize the visual effects to private lands. Erosion control features, such as waterbars and switchbacks, would be used in areas



where grade and terrain dictate. NPS would direct youth crews to complete work using hand tools. Ground disturbance would be approximately 1 acre to establish the trail.

The existing trail would be abandoned in place and the path blocked by a log. We would allow the existing path, approximately 0.3 acres, to naturally revegetate.

**Table 1. Summary of Alternatives**

<b>Action</b>	<b>Alternative 1: No Action</b>	<b>Alternative 2: Relocate the Trail (Proposed Action and Preferred Alternative)</b>
<b>Create new trail segment</b>	This existing trail would be not altered. Access to the upper 1.4 miles of trail would require off-trail travel or route finding to avoid trespass on private lands.	Construct 1.4 miles of new trail. Trail would be located to the east of the existing trail and private lands. The trail would consist of a footpath 2-foot wide with a 2-foot brushed area on each side (total trail width of 6 feet). Construction would be completed by youth crews with NPS guidance.
<b>Abandon old trail segment</b>	The trail would remain open to private lands boundary. Access beyond would require off trail hiking.	The existing trail would be abandoned in place, allowing approximately 0.3 acres to naturally revegetate.

## 6 Affected Environment

### Recreation and Land Status

The Portage Creek trail is located on the northern shore of Lake Clark and is only accessible via watercraft or floatplanes. Recreation and visitor use in this area has been low historically, however, increases in use have been observed in recent years. Opportunities to rent watercraft on Lake Clark have resulted in increased visitation along the lakeshore. The presence of a trail at Portage Creek has drawn visitors seeking a defined route, as it is the only one on Lake Clark outside of Port Alsworth. With a segment of the trail bisecting private lands, trespass is an issue. Camping, hiking, fishing, and berry-picking are common recreation activities at Portage Creek.

### Subsistence

Current subsistence use in the area is low, with most activity conducted by residents living in the Portage Creek area. Moose and black bear hunting occurs in the area during designated seasons. Harvest of firewood is limited, due to the distance required to transport harvested wood. Berry-picking use is also low but includes harvest of blueberries (*Vaccinium corymbosum*), low bush cranberries (*Vaccinium vitis-idaea*), highbush cranberries (*Viburnum edule*), and American red

currants (*Ribes triste*). The presence of private lands in the area influences where subsistence activities occur.

## **Vegetation and Soils**

The proposed project area is comprised of primarily mixed forest with open and closed canopy alder at higher elevations (NPS 1998). Nearly 60 percent of the area is classified as forested, with the remaining 40 percent classified as shrublands of various heights (NPS 1998). The primary tree species in the mixed forest include white spruce (*Picea glauca*), paper birch (*Betula papyrifera*), and balsam poplar (*Populus balsamifera*). Sitka alder (*Alnus viridis sinuate*) is the primary shrub species in the area.

The understory consists of dwarf birch (*Betula nana*), scattered willows (*Salix* spp.), and seedlings of the dominant tree species. Ground cover is dominated by tundra matting, forest/leaf litter with scattered grass, forbs, and mosses.

The area's physiography includes the transition from upland to subalpine, with 44 percent and 56 percent of the area classified as such, respectively (NPS 2011a). Soil textures are primarily ashy-loamy-rocky with smaller areas classed as rocky and bedrock (NPS 2011b).

The existing trail is 3.2 miles long, with 2.8 miles on NPS lands and 0.4 miles of trail on private lands. Previous vegetation clearing to accommodate the trail includes approximately 2 acres on NPS lands and 0.3 acres of vegetation on private lands.

## **Wilderness**

The proposed project area is located in an area considered eligible for wilderness designation. The natural setting of this area is primarily intact, with little change to the natural environment from modern civilization. The undeveloped nature has been altered by the Portage Creek Trail, a small number of cabins on private parcels along the Lake Clark shoreline, and the Bowman Mining Claim which consists of several cabins and outbuildings. Solitude and opportunities for unconfined recreation are still easily found in the area, with few constraints to impede one's activity. On public lands in the Portage Creek drainage, few management actions have been implemented to manipulate the natural system.

# **7 Impact Analysis**

## **Alternative 1: No Action**

### **Effects on Recreation and Land Status**

Recreation and visitor use would remain unchanged; access to the upper 1.4 miles of the Portage Creek Trail and alpine areas beyond would continue to require off-trail travel or route-finding to avoid trespass on private lands. Under this alternative, trespass through private lands on the existing

trail would likely continue. Visitor efforts to avoid trespass could result in social trail formation as routes around private lands are forged.

### **Effects on Subsistence**

Subsistence activity would likely also remain unchanged with access to the upper 1.4 miles of the Portage Creek Trail and areas beyond that requiring off-trail travel around private lands. Under this alternative, trespass and/or social trail formation around private lands may occur.

### **Effects on Vegetation and Soils**

Vegetation and soils would likely be impacted under this alternative. As visitors seek to access the upper 1.4 miles of the Portage Creek trail, social trails could form around the private lands.

Vegetation trampling and soil impacts, such as compaction or erosion, may occur.

### **Effect on Wilderness**

The wilderness character of the area would remain unchanged. The existing trail, mining claim, and small number of structures on private lands in the area would continue to diminish the undeveloped nature of the area. The attraction of the trail would continue to result in human use and continue to have localized effects on solitude.

### **Cumulative Impacts**

With few direct or indirect impacts to recreation and visitor use, subsistence, vegetation and soils, and wilderness, Alternative 1 would have little contribution to cumulative effects on these resources.

Use of the area by visitors would continue to increase, as they look to more accessible and undeveloped areas to recreate on Lake Clark. The desire to access the upper trail and hike in the alpine of the upper Portage Creek Drainage would continue to require trespass or off-trail travel. Route finding around private lands would form social trails, impacting vegetation and soils. Private land owners could continue to seek access to their inholdings, adding use to the existing trail. This combined activity, while mostly confined to the existing trail, would continue to diminish the quality of solitude.

The Joe Thompson Cabin is likely to become open as a public use cabin in the future; this action is considered reasonably foreseeable. It was one of several cabins mentioned for public use in the Lake Clark General Management Plan Amendment (NPS 2014), with the Priest Rock Cabin becoming the first in 2017. The resulting increase in use of the area coming with the availability of a public use cabin would likely increase the potential for trespass and social trail creation as visitors attempt to reach the upper 1.4 miles of trail using defined routes.

## **Alternative 2: Relocate Section of the Portage Creek Trail (Preferred Alternative)**

### **Effects on Recreation and Land Status**

The 1.4 mile segment of relocated trail would provide public trail access to the upper 1.4 miles of the Portage Creek Trail. Opportunities for recreating in the alpine tundra of the upper Portage Creek drainage would be facilitated by a public designated trail. Off-trail travel would not be required to reach higher elevation areas and the likelihood of trespass would be greatly diminished. Although access to higher elevations would be improved, use of this untrailed area would likely remain low. The Portage Creek area would have the only public designated trail on Lake Clark outside of the Port Alsworth area trail system.

### **Effects on Subsistence**

The 1.4 mile segment of relocated trail would improve subsistence access to the upper 1.4 miles of the Portage Creek Trail. Opportunities for subsistence in the upper Portage Creek drainage and areas beyond to hunt and gather would be facilitated by a public designated trail. Currently, subsistence use of the area is limited by access but historically the area was used to access the Lachbuna Lake area (Ellanna 1986). Improved access would likely result in increased use by qualified subsistence users.

### **Effects on Vegetation and Soils**

Trail construction would require the removal of shrubs along the designed route, with trees and shrubs trimmed or removed if necessary to provide a 2-foot wide trail and a 2-foot buffer along each side of the trail. The ground cover from a 2-foot wide area would be removed, resulting in a total cleared area of approximately 1 acre. Exposed soils would be compacted over time by use. Shrubs and trees trimmed would include species common to the area such as Sitka alder, dwarf birch, white spruce, and paper birch.

### **Effect on Wilderness**

The relocated trail segment would adversely affect wilderness character by diminishing the undeveloped qualities. Increases in visitor use could reduce the opportunity for solitude on the trail, but could increase the opportunity for primitive and unconfined recreation in the upper Portage Creek basin and areas beyond.

### **Cumulative Impacts**

With the 1.4 mile trail relocation, the whole of the 4.2 mile Portage Creek Trail would be on NPS lands reducing trespass by visitors. A public trail that provides access to alpine tundra would create improved recreational and subsistence opportunities in the Portage Creek area. The direct impact on 1 acre of vegetation and soils along the relocated 1.4 mile trail would have a small effect as the landcover types in the area are the most common in the Lake Clark basin.

The impacts to wilderness character, primarily the undeveloped quality, would be adversely affected by approximately 1 mile of new trail. Given the limited mileage of trail in the Lake Clark basin, this small quantity of development would add substantially to recreational trail hiking opportunities in

Lake Clark National Park and Preserve. Localized adverse impacts to solitude may occur in eligible wilderness, and enhanced access would be provided to the upper Portage Creek basin where primitive and unconfined recreation can occur.

As described under the cumulative effects for the No Action Alternative, if the Joe Thompson Cabin is opened for public use, greater recreational use of the trail and Portage Creek area would likely result. The Priest Rock Cabin was designated for public use in 2017, and is 5 miles southwest along Lake Clark from the Joe Thompson Cabin. Monthly summer use for the Priest Rock Cabin has been approximately 30 visitors per month, and is a reasonable use estimate for the Joe Thompson Cabin if it is opened to public use. This level of use is likely an increase over current levels, but remains a low level of trail use. As those visitors seek opportunities to hike in the area, a public trail would minimize trespass issues and the proliferation of social trails. The direct and indirect effects of the proposed action would contribute low levels of effects in the Portage Creek area and in Lake Clark National Park and Preserve. The area has had very low levels of human disturbance. Potentially affected resources would continue to function within historic parameters; little change would occur in the physical, biological, or social environment.

**Table 2. Summary of Direct and Indirect Impacts**

<b>Issue</b>	<b>Alternative 1: No Action</b>	<b>Alternative 2: Name (Preferred Alternative)</b>
<b>Recreation and Land Status</b>	Visitor use will continue on the existing trail. Trespass issues and social trail formation remain.	Public trail access to the upper 1.4 miles of trail and the upper Portage Creek basin will enhance recreational opportunities in the area.
<b>Subsistence</b>	No new impacts.	Subsistence opportunities will be improved by trail access to upper Portage Creek basin.
<b>Vegetation and Soils</b>	Social trails formed will impact vegetation and soils.	A 1 acre area would be cleared to construct and buffer the trail. Soils would be compacted over time by use.
<b>Wilderness</b>	Presence of the existing trail affects the undeveloped quality of the area. Use of the trail has localized effects on opportunities for solitude.	The additional 1 mile of trail would add to the developed area. Localized increases in visitors on the trail would reduce opportunities for solitude. Areas beyond the trail would be more accessible and provide opportunities for primitive, unconfined recreation.

## 8 Consultation and Coordination

### Preparer

Buck Mangipane, Lake Clark National Park and Preserve Natural Resource Program Lead

### Persons Consulted

Susanne Fleek-Green, Lake Clark National Park and Preserve Superintendent

Chris Wilcox, Lake Clark National Park and Preserve Chief of Facility Management

Liza Rupp, Lake Clark National Park and Preserve Cultural Resources Program Manager and Subsistence Coordinator

Warren Hill, Lake Clark National Park and Preserve Maintenance and Trail Program Lead

## 9 References

Ellanna, L.J. (editor). 1986. Nasdatla'na Qayeh 'ghosts village' or Portage Creek. Lake Clark Soiocultural Study, Phase I, Priscilla Russell Kari, James Kari, Andrew Balluta, and Albert Wassillie. "Dena'ina Place Names in the Lake Clark National Park and Preserve Study Area." National Park Service. Anchorage, Alaska.

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# **Appendix A: ANILCA Section 810(A) Subsistence – Summary Evaluation and Findings Portage Creek Trail Construction Lake Clark National Park and Preserve**

## **I. INTRODUCTION**

This evaluation was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It summarizes the evaluation of potential restrictions to subsistence activities that could result from the relocation of 1.4 miles of the Portage Creek Trail. The NPS proposes this action to provide opportunity for recreational use while minimizing adverse impacts to the resources and values for which the Park and Preserve were established.

## **II. LAKE CLARK NATIONAL PARK AND PRESERVE**

The purposes for which Lake Clark National Park and Preserve were created are found in the language of the 1980 Alaska National Interest Lands Conservation Act (ANILCA, Pub. L. 96-487). As a unit of the National Park System, Lake Clark National Park and Preserve shall be administered to:

- protect the watershed necessary for the perpetuation of the red salmon fishery in Bristol Bay;
- maintain unimpaired the scenic beauty and quality of portions of the Alaska Range and Aleutian Range, including active volcanoes, glaciers, wild rivers, lakes, waterfalls, and alpine meadows in their natural state; and
- protect habitat for and populations of fish and wildlife including but not limited to caribou, Dall sheep, brown/grizzly bears, bald eagles, and peregrine falcons.

## **III. 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 affected 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.

#### **IV. PROPOSED ACTION ON FEDERAL LAND**

Lake Clark National Park and Preserve proposes to relocate up to 1.4 miles of the Portage Creek Trail onto NPS lands. The proposed trail segment would be 2 feet wide with a 2-foot wide brushed area on each side removing undergrowth to facilitate hiking (total width of 6 feet). The route would follow a sustainable grade east of the existing trail with a vegetative buffer to minimize the visual effects to private lands. Erosion control features, such as waterbars and switchbacks, would be used in areas where grade and terrain dictate. The *Description of Alternatives* section of the EA describes each alternative being considered in detail. The following is a brief summary:

Under the *No Action Alternative*, the NPS would not relocate up to 1.4 miles of the Portage Creek Trail. Access to the upper 1.4 miles of trail would require off-trail travel or route finding to avoid trespass on private lands.

Under *Alternative 2, (NPS Preferred Alternative)* the NPS would relocate up to 1.4 miles of the Portage Creek Trail onto NPS lands. This would provide public access via a continuous 4.2-mile trail to the alpine tundra in the upper Portage Creek Basin and opportunities for pedestrian access to Lachbuna Lake.

## **V. THE AFFECTED ENVIRONMENT RELATIVE TO SUBSISTENCE USE**

Joe Thompson was one of the early Euroamerican settlers to the Lake Clark area. He arrived in the area sometime in the 1930s. Like many of the early settlers, he adopted a subsistence lifestyle of prospecting and trapping. He was known as a prospector, trapper and log cabin builder (Branson 1998:36-37). He had several claims in the vicinity of Kijik River. During the time that Thompson lived at the cabin near Portage Creek, he was working on a mining prospect located approximately six miles up the canyon. He established a trail to the prospect site, which he hiked on a near daily basis.

Local rural residents continue to engage in, and depend on, resources from the park and preserve for personal consumption, cultural identity, and to maintain a subsistence way of life.

In accordance with regulations in 36 CFR Part 13, residents of the NPS designated resident zone communities of Iliamna, Lime Village, Newhalen, Nondalton, Pedro Bay, and Port Alsworth and people who reside inside the boundaries of the park are qualified to engage in subsistence activities in Lake Clark National Park and Preserve under the Federal Subsistence Program. Local rural residents who do not live in these communities but who have customarily and traditionally engaged in subsistence activities within the park may continue to do so with a subsistence use permit issued by the park superintendent.

Current subsistence use in the area is low, with most activity conducted by residents living in the Portage Creek area. Moose and black bear hunting occurs in the area during designated seasons. Harvest of firewood is limited, due to the distance required to transport harvested wood. Berry-picking use is also low but includes harvest of blueberries (*Vaccinium corymbosum*), low bush cranberries (*Vaccinium vitis-idaea*), highbush cranberries (*Viburnum edule*), and American red currants (*Ribes triste*). The presence of private lands in the area influences where subsistence activities occur.

## **VI. SUBSISTENCE USES AND NEEDS EVALUATION**

To determine the potential impacts on subsistence activities from rerouting the trail, three evaluation criteria were analyzed relative to existing subsistence resources:

1. The potential to reduce subsistence fish and wildlife populations by (a) reductions in number, (b) redistribution of subsistence resources, or (c) habitat losses;
2. The potential effect on subsistence fisher or hunter access;

3. The potential to increase fisher or hunter competition for subsistence resources.

### **1. The potential to reduce populations**

In all the alternatives considered in this analysis, there is minimal potential to reduce numbers of or redistribute fish and wildlife populations, or reduce habitat for subsistence fish and wildlife populations. The proposed trail reroute will disturb soils and destroy some shrubs and other vegetation that provide habitat for small mammals and birds. While the soil disturbances and removal of vegetation may impact the relative abundance of certain plants along the trail route, the effects will be limited and not result in a significant loss of habitat. In addition, these developments are not expected to reduce or redistribute wildlife populations in the project area.

### **2. Restriction of Access**

***Alternative 1 (No Action Alternative).*** The trail will not be rerouted around private inholdings. Access to subsistence resources from the upper 1.4 miles of trail would still be restricted by the need for off-trail travel or route finding to avoid trespass on private lands.

***Alternative 2 (NPS Preferred Alternative).*** The NPS will relocate up to 1.4 miles of the Portage Creek Trail onto NPS lands. This would enhance subsistence user access to the alpine tundra in the upper Portage Creek Basin and opportunities for pedestrian access to Lachbuna Lake via a continuous 4.2-mile trail.

### **3. Increase in Competition**

***Alternative 1 (No Action Alternative).*** The no action alternative will preserve the status quo and not encourage new or expanded recreational use of the existing trail. Alternative 1 will not result in any increase in competition between subsistence and other users for subsistence resources.

***Alternatives 2 (Preferred Alternative).*** The rerouted trail proposed in Alternative 2 may result in a nominal increase in competition during the summer months between local subsistence users and people utilizing the trail for recreational purposes. However, the potential for increased competition between user groups will be minimized by the fact that there are limited opportunities for subsistence hunting during the summer months when the peak recreational use will occur.

Additionally, provisions of ANILCA and NPS regulations mandate that if and when it is necessary to restrict the taking of fish or wildlife on NPS lands, subsistence users will have priority over other user groups. Implementation of this subsistence preference would reduce or eliminate any increased competition that might result from increased visitation by recreationists, sport hunters or anglers. In addition, the superintendent may enact closures and/or restrictions if necessary to protect subsistence opportunities or to assure the continued viability of a particular fish or wildlife population.

## **VII. AVAILABILITY OF OTHER LANDS**

Lands managed by the Bureau of Land Management share common boundaries with LACL and are the closest federal public lands to the proposal area where Title VIII subsistence occurs. There are other lands inside and outside LACL boundaries where local rural residents may harvest subsistence resources including state, tribal and private lands and lands belonging to ANCSA corporations.

## **VIII. ALTERNATIVES CONSIDERED**

This analysis has evaluated two alternatives: Alternative 1, to maintain the status quo, and Alternative 2, to reroute 1.4 miles of the trail to avoid trespass on private lands.

## **IX. FINDINGS**

This analysis concludes that the proposed action described in Alternative 2 would not result in a significant restriction of subsistence uses.

## **REFERENCES**

Branson, John B. 1998. A 20<sup>th</sup> Century Portrait of Lake Clark Alaska 1900-2000. National Park Service