

APPENDIX A

ANILCA SECTION 810(a) SUMMARY EVALUATION AND FINDINGS

I. INTRODUCTION

This section was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It summarizes the evaluations of potential restrictions to subsistence activities that could result from authorizing a right-of-way (ROW) for the construction and operation of microwave and wireless communications facilities that would provide broadband service to McCarthy and the surrounding area within Wrangell-St. Elias National Park and Preserve, 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 will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions."

ANILCA created new units and additions to existing units of the national park system in Alaska. Wrangell-St. Elias National Park, containing approximately eight million one hundred and forty-seven thousand acres of public lands, and Wrangell-St. Elias National Preserve containing approximately four million one hundred and seventeen thousand acres of public lands, was created by ANILCA, section 201(9), for the following purposes:

"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; to protect habitat for, and populations of, fish and wildlife including but not limited to caribou, brown/grizzly bears, Dall's sheep, moose, wolves, trumpeter swans and other waterfowl, and

marine mammals; and to provide continued opportunities including reasonable access for mountain climbing, mountaineering, and other wilderness recreational activities. Subsistence uses by local residents shall be permitted in the park, where such uses are traditional, in accordance with the provisions of Title VIII.”

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."

III. PROPOSED ACTION ON FEDERAL LANDS

The National Park Service (NPS) is considering two alternatives for authorizing a ROW for the construction and operation of microwave and wireless communications facilities that would provide broadband service to McCarthy and the surrounding area within Wrangell-St. Elias National Park and Preserve (WRST or the park). WRST, the community of McCarthy, and the community of Chitina are currently served by a limited distribution of cellular towers for wireless telecommunications and satellites for digital data transfer (internet). Copper Valley Wireless (CVW) has applied for a ROW to install new two communications sites and upgrade one existing communications site on land managed by NPS. The completion of this project would bring residents, businesses and visitors of McCarthy improved access to broadband and telecommunications services and expand wireless coverage of the McCarthy Road corridor for 911 emergency dialing capabilities. A full discussion of the alternatives and their anticipated effects is presented in the Environmental Assessment (EA). The alternatives are summarized briefly below.

Alternative 1 – No Action: The NPS and the community of McCarthy would continue to receive wireless telephone and internet communications through satellite provided by CVW. No facilities or utilities would be removed or constructed. This alternative represents a continuation of the existing situation and provides a baseline for evaluating the changes and impacts of the action alternative.

Alternative 2 – McCarthy Communications Sites (proposed action): Two new microwave/wireless sites would be built at Gilahina Butte and on a ridge near the mouth of the Lakina River, and an existing communications site at Sourdough Ridge would be upgraded. At each of the two new sites, vegetation would be cleared in an area of no more than 60 feet by 100 feet to accommodate the communication facility along with a 50-foot by 50-foot helicopter landing area. Up to 12 additional spruce trees may be cut at each new site in the microwave signal directions. The infrastructure at each new site will consist of a 30-foot tall tower with microwave dishes and cellular antennas, solar power array, propane tanks, and two small fiberglass buildings on raised metal platforms housing the facility equipment. New infrastructure at the existing Sourdough Ridge site would consist of a 30-foot tall tower and building addition. The Gilahina Butte facility will be collocated with an existing seismic station. In each case, existing cleared areas would be used for staging supplies and equipment. Following installation, the stations would be visited approximately six times per year for refueling and maintenance purposes. For both installation and maintenance, the facilities would be accessed by helicopter in accordance with the park's helicopter policy.

IV. AFFECTED ENVIRONMENT

A summary of the affected environment pertinent to subsistence use is presented here. The following documents contain additional descriptions of subsistence uses within Wrangell-St. Elias National Park and Preserve:

Bleakley, Geoffrey T. 2002. *Contested Ground, An Administrative History of Wrangell-St. Elias National Park and Preserve, Alaska, 1978-2001*, NPS Alaska Region.

Haynes, Terry L., Martha Case, James A. Fall, Libby Halpin, and Michelle Robert. 1984. *The use of Copper River salmon and other wild resources by Upper Tanana communities, 1983-1984*. ADF&G Division of Subsistence, Technical Paper No. 115.

Marcotte, James R. 1992. *Wild fish and game harvest and use by residents of five Upper Tanana communities, Alaska, 1987-88*. ADF&G Division of Subsistence, Technical Paper No. 168.

Norris, Frank. 2002. *Alaska Subsistence: A National Park Service Management History*, NPS Alaska Region.

NPS Alaska Region. 1986. *General Management Plan/Land Protection Plan*, Wrangell-St. Elias National Park and Preserve.

NPS Alaska Region, 1988. *Final Environmental Impact Statement, Wilderness Recommendation*.

NPS Alaska Region. 1988. *Wrangell-St. Elias Subsistence Management Plan*. (Updated most recently in 2004.)

NPS Alaska Region. *Wrangell-St. Elias National Park and Preserve Subsistence Users Guide*. (Updated most recently in 2005.)

Stratton, Lee, and Susan Georgette. 1984. *Use of fish and game by communities in the Copper River Basin, Alaska: a report on a 1983 household survey*. ADF&G Division of Subsistence, Technical Paper No. 107.

Subsistence uses are allowed within Wrangell-St. Elias National Park and Preserve in accordance with Titles II and VIII of ANILCA. The national preserve is open to federal subsistence uses and state authorized general (sport) hunting, trapping and fishing activities. Qualified local rural residents who live in one of the park's twenty-three designated resident zone communities or have a special subsistence use permit issued by the park superintendent may engage in subsistence activities within the national park. State-regulated sport fishing is also allowed in the national park. The proposed action would potentially affect both park and preserve lands.

Based on 2000 U.S. Census data compiled by the Alaska Department of Community and Economic Development, the National Park Service estimates that approximately 6,000 individuals are eligible to engage in federal subsistence activities in Wrangell-St. Elias National Park and Preserve. These activities include hunting, trapping, fishing, berry picking, gathering mushrooms and other plant materials, collecting firewood, and harvesting timber for house construction. Most subsistence hunting within Wrangell-St. Elias occurs off the Nabesna and McCarthy roads and the trails that originate from them. The Copper, Nabesna, Chisana and Chitina rivers serve as popular riverine access routes for subsistence users. Most of the subsistence fishing takes place in the Copper River. In the McCarthy Road corridor, local rural residents commonly harvest moose, black bear, snowshoe hare, spruce grouse, berries, and firewood for subsistence purposes.

The NPS recognizes that patterns of subsistence use 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 considerable from previous years due to weather conditions, migration patterns, and natural population cycles.

V. SUBSISTENCE USES AND NEEDS EVALUATION

To determine the potential impact on existing subsistence activities, three evaluation criteria were analyzed relative to existing subsistence resources which could be impacted.

The evaluation criteria are as follows:

1. the potential to reduce important subsistence fish and wildlife populations by (a) reductions in numbers, (b) redistribution of subsistence resources, or (c) habitat losses;
2. what affect the action might have on subsistence fisher or hunter access; and
3. the potential for the action to increase fisher or hunter competition for subsistence resources.

The potential to reduce populations:

No significant impact to the number or distribution of fish or wildlife harvested for subsistence is anticipated as a result of the proposed action or the no-action alternative. Installation and maintenance of the new and expanded facilities under Alternative 2 could temporarily displace wildlife in the immediate vicinity of the sites. The footprint of the sites is quite small, however, and any wildlife habitat loss would be extremely minor. In sum, the proposed alternatives are not expected to significantly reduce populations of important subsistence resources.

The effect on subsistence access:

The alternatives evaluated in this analysis are not anticipated to result in a significant restriction to subsistence access. Access for federal subsistence uses in the Wrangell-St. Elias National Park and Preserve is granted pursuant to Section 811 of ANILCA. Allowed means of access by federally qualified subsistence users in WRST include motorboat, snowmachine (subject to frozen ground conditions and adequate snow cover), ORVs, and airplane (preserve only), along with non-motorized means such as foot, horses, and dog teams. The proposed action alternative along with the no-action alternative would have no direct impact on allowed means of subsistence access, nor would the alternatives affect the areas open to subsistence users or access routes to those areas. Thus, neither of the alternatives discussed in this analysis would affect subsistence hunter or fisher access.

The potential to increase competition:

Competition for subsistence resources on federal public lands is not expected to increase under either of the alternatives discussed in this analysis. Therefore, the proposed action is not expected to adversely affect resource competition.

VI. AVAILABILITY OF OTHER LANDS

The EA and this evaluation have described and analyzed the proposed alternatives. No other alternatives that would reduce or eliminate the use of public lands needed for subsistence purposes were identified. The amount of land affected by the proposed action is minimal in relation to the overall amount of federal public land in the park and the preserve, however, and it is possible for subsistence users to utilize other lands.

VII. ALTERNATIVES CONSIDERED

The EA and this evaluation have described and analyzed the proposed alternatives. The proposed actions are consistent with NPS mandates and the GMP for the park and preserve. The burial and maintenance of a cable along the McCarthy Road was considered but rejected due to cost and also because it would be prone to damage due to unstable soils and other extreme environmental conditions. Installing a similar system on private properties along the road was rejected because it would have required that more sites be constructed and maintained. No other alternatives were considered.

VII. FINDINGS

This analysis concludes that none of the alternatives discussed in this evaluation will result in a significant restriction of subsistence uses.

APPENDIX B

ARTHUR CARHART NATIONAL WILDERNESS TRAINING CENTER



MINIMUM REQUIREMENTS DECISION GUIDE

WORKSHEETS

" . . . except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act..."

– the Wilderness Act, 1964

Please refer to the accompanying MRDG [Instructions](#) for filling out this guide.

The spaces in the worksheets will expand as necessary as you enter your response.

Step 1: Determine if any administrative action is necessary.

Description: Briefly describe the situation that may prompt action.

Wrangell-St. Elias National Park and Preserve (WRST) and the community of McCarthy are currently served by a limited distribution of cellular towers for wireless telecommunications, and satellite for digital data transfer (internet) which has a limited data bandwidth. The majority of the McCarthy Road corridor linking Chitina and McCarthy lacks cellular phone coverage. Copper Valley Wireless (CVW), a subsidiary of Copper Valley Telephone Cooperative (CVTC), has applied for a right-of-way (ROW) to build a new communications site at Gilahina Butte, build a new repeater site near the Lakina River, and upgrade their existing communications site on Sourdough Ridge above McCarthy to provide expanded cellular service and increased bandwidth to McCarthy and the National Park Service (NPS) facilities along the microwave path extending from Chitina.

CVW would build two communications sites and upgrade an existing site on land managed by NPS. This project would connect the McCarthy area to an existing fiber optic cable in Chitina and ultimately to the outside world. The completion of this project would bring residents, businesses and visitors of McCarthy access to state-of-the-art broadband and telecommunications services.

This project can be approved only after a wilderness eligibility review, conducted as a part of the Environmental Assessment, determines that the two sites are on wilderness ineligible lands. A Minimum Requirements Analysis has been completed in order to determine possible effects of this proposal on adjacent eligible wilderness. See the recommended Wilderness Eligibility Revision in Appendix C of the Environmental Assessment (EA) which accompanies this proposal.

This proposed project was approved and funded by an American Recovery and Reinvestment Act Grant. The NPS has determined the proposed project is consistent with the 1986 WRST *General Management Plan, Land Protection Plan, Wilderness Suitability Review* (GMP).

To determine if administrative action is necessary, answer the questions listed in A - F on the following pages.

A. Describe Options Outside of Wilderness

Yes: ☒ No: ☐

Explain:

The proposed action is predicated on the approval of the Wilderness Eligibility Revision proposed in Appendix C. In this case, both the Gilahina Butte site and the Lakina Terrace site would be located outside eligible wilderness and no analysis of impacts is necessary. However, due to their proximity to eligible and designated wilderness, there are still possible effects to the wilderness character and values of the surrounding lands. This MRDG has been completed in order to determine possible effects of this proposal on adjacent eligible wilderness.

The proposed CVW telecommunication facilities are line of sight microwave paths that for technical reasons are only possible at the proposed sites outside of but surrounded by eligible wilderness. No other options for alternative placement are feasible, or would place the facilities in existing eligible or designated wilderness.

B. Describe Valid Existing Rights or Special Provisions of Wilderness Legislation

Is action necessary to satisfy valid existing rights or a special provision in wilderness legislation (the Wilderness Act of 1964 or subsequent wilderness laws) that allows consideration of the Section 4(c) prohibited uses? Cite law and section.

Yes: ☐ No: ☒ Not Applicable: ☐

Explain:

The Alaska National Interest Lands Conservation Act (1980) provides for a process by which the construction of telecommunication facilities in designated wilderness may be approved.

Title XI of ANILCA addresses transportation and utility systems. Section 1101(a) states:

Alaska's transportation and utility network is largely undeveloped and the future needs for transportation and utility systems in Alaska would best be identified and provided for through an orderly, continuous decisionmaking process involving the State and Federal Governments and the public;

Title XI of ANILCA establishes a process for authorizing transportation and utility systems in and across conservation system units, including the construction, operation, and maintenance of an approved system. Section 1106(b) of ANILCA provides a process for approval of a transportation or utility system, such as canals, pipelines, electric transmission lines, roads, railroads, docks, or airports, **and telecommunications facilities** in designated wilderness. In order to approve a transportation or utility system in wilderness, ANILCA states that, after preparation of an environmental impact statement and consideration of comments from the public and federal agencies, the appropriate federal agency tentatively approves or disapproves the application and forwards to the President for approval or disapproval. If the President approves the transportation or utility system, the recommendation is forwarded to Congress for approval or disapproval, followed by an authorization from the appropriate federal agency if Congress approves the transportation or utility system.

C. Describe Requirements of Other Legislation

Yes: ☐ No: ☒ Not Applicable: ☐

Explain:

D. Describe Other Guidance

Is action necessary to conform to direction contained in agency policy, unit and wilderness management plans, species recovery plans, or agreements with tribal, state and local governments or other federal agencies?

Yes: ☐ No: ☒ Not Applicable: ☐

Explain:

E. Wilderness Character

Is action necessary to preserve one or more of the qualities of wilderness character including: untrammeled, undeveloped, natural, outstanding opportunities for solitude or a primitive and unconfined type of recreation, or unique components that reflect the character of this wilderness area?

Untrammeled: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on wilderness character.

Undeveloped: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on wilderness character.

Natural: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on wilderness character.

Outstanding opportunities for solitude or a primitive and unconfined type of recreation:

Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on wilderness character.

Other unique components that reflect the character of this wilderness:

Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on wilderness character.

F. Describe Effects to the Public Purposes of Wilderness

Is action necessary to support one or more of the public purposes for wilderness (as stated in Section 4(b) of the Wilderness Act) of recreation, scenic, scientific, education, conservation, and historical use?

Recreation: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on the public purposes of wilderness.

Scenic: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on the public purposes of wilderness.

Scientific: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on the public purposes of wilderness.

Education: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on the public purposes of wilderness.

Conservation: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on the public purposes of wilderness.

Historical use: Yes: ☐ No: ☒ Not Applicable: ☐

Explain: This action would have a negative effect on the public purposes of wilderness.

Step 1 Decision: Is any administrative action necessary in wilderness?

Yes: ☐ No: ☒ More information needed: ☐

Explain:

As a part of the EA for this proposal WRST will conduct a Wilderness Eligibility Review seeking through a public process to remove the Gilahina Butte site from eligible wilderness status. WRST's 1988 Draft Wilderness Recommendations EIS, which was completed but never approved, excluded all three sites from future wilderness designation in its proposed action alternative (Alternative 2). That recommendation was never forwarded nor was a Record of Decision (ROD) ever signed. In 1988, the Sourdough Ridge site was found to be ineligible and at the Gilahina Butte site, a non-conforming seismic station, which predates the establishment of WRST, was already in regular use. CVW's new telecommunications facility would be co-located with it. The Lakina Terrace site was found to be

ineligible due to non-federal land applications. Since that time, the Lakina site has been retained in federal ownership, but its ineligible status has not changed.

If action is necessary, proceed to Step 2 to determine the minimum activity.

Step 2: Determine the minimum activity.

Please refer to the accompanying MRDG [Instructions](#) for an explanation of the effects criteria displayed below.

Description of Alternatives

For each alternative, describe what methods and techniques will be used, when the activity will take place, where the activity will take place, what mitigation measures are necessary, and the general effects to the wilderness resource and character.

Alternative # 1 (NO ACTION)

Description: No Action.

Effects: No new impacts to wilderness character.

Wilderness Character

“Untrammeled”

“Undeveloped”

“Natural”

“Outstanding opportunities for solitude or a primitive and unconfined type of recreation”

Other unique components that reflect the character of this wilderness

Heritage and Cultural Resources

No effect.

Maintaining Traditional Skills

No effect.

Special Provisions

No effect.

Economic and Time Constraints

No effect.

Additional Wilderness-specific Comparison Criteria

No effect.

Safety of Visitors, Personnel, and Contractors

No effect.

ALTERNATIVE # 2 (ACTION ALTERNATIVE)

Description: Development of the Gilahina Butte and Lakina Terrace communications sites on ineligible wilderness, only after a Wilderness Eligibility Review has determined the status of the two sites to be ineligible.

Effects:

Wilderness Character

“Untrammeled”

The two communication facilities proposed for construction adjacent to eligible wilderness would minimally affect the area’s Untrammeled quality. Although the area around the two sites will be cleared of vegetation, the affects of this are localized to the sites themselves and do not have a widespread impact on the “community of life” nor is there likely to be large scale manipulation of the biophysical environment.

Mitigation

None.

“Undeveloped”

The construction, operation and maintenance of the proposed CVW communication facilities at the two sites would locally affect the adjacent area’s Undeveloped quality. The non-recreational development of helicopter pads, towers, antennas and attendant equipment would affect the primeval character and influence of the surrounding area. Increased mechanization from construction would be temporary, but continuous operation and maintenance site visits will increase mechanization throughout the area.

A total of up to 0.56 acres of vegetation would be cleared and removed from the Gilahina and Lakina sites, detracting from the naturalness of the area. Land adjacent to eligible wilderness will be mechanically cleared of brush and trees. At the Gilahina Site up to 0.28 acres of land will be cleared and leveled. At the Lakina site up to 0.28 acres of land. At both sites helicopter landing pads, 30’ towers, poured concrete pads will be necessary. Up to 36 trees may be removed from the line of site path of the towers. Gasoline powered generators and tracked vehicles will be used during the construction phase of this project.

The CVW communications site on Gilahina Butte would be visible from a short section of the McCarthy Road, and from eligible wilderness around the site, and both facilities would be visible from the air, thus posing unnatural intrusions into the view shed. Such intrusions would include actual visibility of the facilities as well as glare reflected off their solar panels. Other visual intrusions would be the take-off, landings, and flight paths of helicopters used for construction and maintenance of the sites.

Mitigation

The antennas at the communications facilities would be installed in such a way as to minimize protrusion beyond the silhouette/horizon of the sites. Structures and antennas would be painted with appropriate colors to blend in with each environment. Only a minimum of vegetation (including large trees) necessary for flight safety and antenna clearance would be removed to minimize the impact on the view shed of the site clearing.

Guidelines developed for WRST’s Helicopter Use Policy (NPS 2005) would be followed. In planning flight paths, all feasible measures would be undertaken to avoid and/or minimize impacts to backcountry users. Planned flight routes would be submitted for approval by the park superintendent and maintained by the park dispatcher. Travel routes may not take as direct a

route as possible in order to minimize flights over sensitive areas or areas of known backcountry use. Aircraft would avoid high public use and residence areas when feasible. Helicopter altitude and horizontal distances would conform to WRST's Helicopter Use Policy.

"Natural"

CVW's proposed communication facilities would leave wilderness ecological systems substantially free from the effects of modern civilization. While plant and animal resources, biophysical and physical processes will be impacted locally, the affect of the two sites on the Natural quality of adjacent wilderness eligible lands would be limited.

Mitigation

None.

"Outstanding opportunities for solitude or a primitive and unconfined type of recreation"

The construction, operation and maintenance of the proposed CVW communication facilities would increase noise intrusions due to the presence of field crews and the helicopter necessary to access the sites; these noise intrusions would detract from the immediate area's wilderness solitude.

Copper Valley Wireless estimates that there will be up to 10 helicopter landings per year per site for the upkeep of these facilities for a cumulative total of approximately 30 helicopter events per year. Mechanized access within sight and sound of visitors will detract from the remoteness of the area. Remoteness from sights and sounds of people inside the wilderness, remoteness from occupied and modified areas will be decreased.

The effect of helicopter landings, takeoffs and flight paths on soundscapes in support of the CVW communication facilities will be both temporary and long term. Sound intrusions will be experienced by the visiting public during times of construction and maintenance. CVW estimates up to 30 such intrusions per year.

Encountering a communication facility adjacent to eligible wilderness would have a detrimental effect on visitor experiences. Copper Valley Wireless estimates that there will be up to 10 helicopter landings per year per site for the upkeep of these facilities for a cumulative effect of 30 helicopter landings per year in an area of moderate visitor use.

Mitigation

Guidelines developed for WRST's Helicopter Use Policy (NPS 2005) would be followed. In planning flight paths, all feasible measures would be undertaken to avoid and/or minimize impacts to backcountry users. Planned flight routes would be submitted for approval by the park superintendent and maintained by the park dispatcher. Travel routes may not take as direct a route as possible in order to minimize flights over sensitive areas or areas of known backcountry use. Aircraft would avoid high public use and residence areas when feasible. Helicopter altitude and horizontal distances would conform to WRST's Helicopter Use Policy.

Signs would be posted on the station equipment explaining its purpose and listing contact information. Use of helicopters during hunting season would be avoided. Flight paths would avoid known wilderness users and areas where users are known to concentrate. Both areas are close to the McCarthy Road, allowing CVW to transport supplies by truck to the Chokosna Airstrip, thereby reducing the length of the helicopter flights necessary to construct and supply the stations. This would reduce the area of the park to be over flown and the total amount of flight time, reducing noise intrusions. In some cases a longer, more circuitous flight paths may be required in order to minimize impacts on visitors.

Other unique components that reflect the character of this wilderness

Heritage and Cultural Resources

No effect.

Maintaining Traditional Skills

No effect.

Special Provisions

No effect.

Economic and Time Constraints

No effect.

Additional Wilderness-specific Comparison Criteria

No effect.

Safety of Visitors, Personnel, and Contractors

A significant improvement in the safety of visitors, personnel and contractors is the expected outcome of the proposed Alternative 2. Increased wireless communications will facilitate faster response times for accidents and incidents that occur along the road between Chitina and McCarthy. Better communications will streamline park operations allowing for more efficient law enforcement and emergency medical services.

Comparison of Alternatives

It may be useful to compare each alternative's positive and negative effects to each of the criteria in tabular form, keeping in mind the law's mandate to "preserve wilderness character."

	Alternative 1	Alternative 2
Untrammelled	NA	-
Undeveloped	NA	-
Natural	NA	-
Solitude or Primitive Recreation	NA	-
Unique components	NA	-
WILDERNESS CHARACTER		-----

	Alternative 1	Alternative 2
Heritage & Cultural Resources	NA	NA

Maintaining Traditional Skills	NA	NA
Special Provisions	NA	NA
Economics & Time	NA	NA
Additional Wilderness Criteria	NA	NA
Safety	NA	+
OTHER CRITERIA SUMMARY	NA	+

Safety Criterion

If safety issues override impacts to wilderness character or other criteria, provide documentation that the use of motorized equipment or other prohibited uses is necessary because to do otherwise would cause increased risks to workers or visitors that cannot be satisfactorily mitigated through training, use of personal protective equipment (PPE), or other requirements to alleviate the safety risk. (This documentation can take the form of agency accident-rate data tracking occurrences and severity; a project-specific job hazard analysis; research literature; or other specific agency guidelines.)

Documentation:

There is no documentation as to the number of injuries/fatalities that may be avoided or mitigated as the result of increased wireless communications along the McCarthy Road between the village of Chitina and the town of McCarthy. Currently, there are many places along the road where conventional cell coverage is spotty or non-existent. Park personnel and park visitors routinely experience a communication black-out along large sections of the road, where emergency assistance can be hours away. It is logical to assume that better communications will reduce emergency response times and make law enforcement activities safer. It is also documented that the availability and use of wireless communication devices while driving can lead to driver distraction that has led to an increase in auto accidents, injuries and fatalities. A new evaluation by the Harvard Center for Risk Analysis (HCRA) estimates that the use of cell phones by drivers may result in approximately 2,600 deaths, 330,000 moderate to critical injuries, 240,000 minor injuries, and 1.5 million instances of property damage in America per year. But because the data on cell phone used by motorists are still limited, the range of uncertainty is wide.

Step 2 Decision: What is the Minimum Activity?

Please refer to the accompanying MRDG [Instructions](#) before describing the selected alternative and describing the rationale for selection.

Selected alternative:

Alternative 2: Development of Proposed Telecommunications Facilities

Rationale for selecting this alternative (including documentation of safety criterion, if appropriate):

The selected Alternative 2 has a net negative effect on wilderness character. It is not the minimum activity for the administration of the area as wilderness. However, because of the expected improvement in visitor and employee safety, and because of WRST's intent to remove the area in question from wilderness eligibility status, Alternative A is preferred.

It has been 22 years since the 1988 Wilderness EIS was forwarded to the DOI recommending the area for wilderness designation. In the ensuing two decades the conditions in the surrounding area has changed. WRST acquired the Kennecott Mine and surrounds and now administers the area as a National Historic Monument. NPS encourages thousands of visitors annually to visit the area. Inadequate communications infrastructure has created a situation at Kennecott and along the road to McCarthy/Kennecott, where the park is unable to make timely responses to emergency situations that occur. Visitors and employees are unable to contact law enforcement or emergency medical personnel and ranger response time is usually hours away.

Through the public process required by the EA for the proposal, WRST intends to remove the area's status as "eligible wilderness." There are pre-existing conditions and non-conforming uses that occur within the area that are incompatible with wilderness values. Analysis of these areas included in WRST's 1988 Draft Wilderness Recommendations EIS, which was completed but never approved, excluded all three sites from future wilderness designation in its proposed action alternative (Alternative 2). A USGS seismic station, which predates the establishment of WRST, is already situated on Gilahina Butte and CVW's new telecommunications facility would be co-located with it.

Because the sites would be constructed only if the Wilderness Eligibility Review finds the two sites ineligible, this minimum requirements analysis takes into account those effects that the proposal would have on adjacent eligible wilderness.

Monitoring and reporting requirements:

Guidelines developed for WRST's Helicopter Use Policy (NPS 2005) would be followed. In planning flight paths, all feasible measures would be undertaken to avoid and/or minimize impacts to backcountry users. Planned flight routes would be submitted for approval by the park superintendent and maintained by the park dispatcher. Travel routes may not take as direct a route as possible in order to minimize flights over sensitive areas or areas of known backcountry use. Aircraft would avoid high public use and residence areas when feasible. Helicopter altitude and horizontal distances would conform to WRST's Helicopter Use Policy.

Check any Wilderness Act Section 4(c) uses approved in this alternative:

- | | |
|--|---|
| <input checked="" type="checkbox"/> mechanical transport | <input checked="" type="checkbox"/> landing of aircraft |
| <input checked="" type="checkbox"/> motorized equipment | <input type="checkbox"/> temporary road |
| <input type="checkbox"/> motor vehicles | <input checked="" type="checkbox"/> structure or installation |
| <input type="checkbox"/> motorboats | |

Record and report any authorizations of Wilderness Act Section 4(c) uses according to agency procedures.

Approvals	Signature	Name	Position	Date
Prepared by:		Peter A. Christian	WRST Wilderness Coordinator	11/15/10
Recommended:		Geoffrey Bleakley	WRST NEPA Coordinator	11/16/10
Recommended:				
Approved:				

APPENDIX C

WILDERNESS ELIGIBILITY REVISION

Introduction

This Appendix provides information on the wilderness eligibility revision that is being proposed as part of the McCarthy Communications Sites Environmental Assessment (EA). The first section provides information and definitions helpful to understanding the National Park Service (NPS) wilderness process. The second section provides background information on the 1986 eligibility assessment and mapping done as part of the Wrangell-St. Elias National Park and Preserve General Management Plan (GMP). This section also includes the 1986 eligibility map. The third section explains why this specific revision is being considered and presents the data used to justify it.

I. NPS wilderness process and definitions

Eligible wilderness: This is a term used in NPS policy which refers to lands that have met the NPS's initial screening assessment as to whether they meet the minimum criteria for inclusion in the national wilderness preservation system (NPS Management Policy 2006, 6.2.1)

- The old term for these lands is "suitable." It was found to be confusing because language in the Wilderness Act in Section 3(c) uses the term "suitable" to refer to lands that the Secretary of Interior is sending to the President that have been studied through a public process.
- Lands that were included in the "Wilderness Suitability Review" that is appended to the 1986 Wrangell-St. Elias National Park and Preserve GMP are those lands that are "eligible" wilderness.
- Finding lands eligible is a declarative process under NPS policy and public involvement is limited to a notification of intention to conduct the assessment and publication of the Director's determination (NPS Management Policy 2006, 6.2.1.3).
- Under policy, eligible wilderness is managed as wilderness to preserve Congressional options for action in the future.

Wilderness study: The next step in the process.

- A wilderness study takes the lands that are eligible and conducts a formal study to develop what would become the recommendation to Congress for wilderness designation.
- NPS considers this to be an action requiring NEPA, hence a public process.
- Not all eligible lands go forward as proposed wilderness (the next step) from the NPS Director to the Assistant Secretary. That is the purpose of the study and the public involvement process—to sort out which, if any, of the eligible lands the NPS proposes to be sent to Congress.
- For Wrangell-St. Elias National Park and Preserve a wilderness study was conducted in 1988, pursuant to ANILCA Section 1317. An Environmental Impact Statement (EIS) was drafted but no final action was taken and no Record of Decision (ROD) or Federal Register Notice was completed. This EIS is not considered to be complete by the NPS.

Proposed wilderness: Those lands which have undergone a wilderness study and which the Director has forwarded to the Assistant Secretary's Office for action by the Secretary.

Designated wilderness: Those lands that Congress has designated through law.

II. 1986 Wilderness Eligibility Assessment

Background: Wrangell-St. Elias National Park and Preserve was established by ANILCA, which was adopted on December 2, 1980. Section 107 of ANILCA designated “approximately eight million seven hundred thousand acres” as wilderness within Wrangell-St. Elias National Park and Preserve. This number has since been refined based on better mapping techniques and consideration of inholdings. ANILCA Section 1317 required a wilderness eligibility review and wilderness recommendations regarding the non-designated lands in the park.

To meet this requirement, the park included a wilderness eligibility review as part of its 1986 GMP. Wilderness review criteria specific to the park were developed. The specific criteria are described as follows:

Land Status

- Federal land—eligible
- Federal land under application, unpatented mining claims, and cemetery and historic sites—ineligible if conveyed or patented into nonfederal ownership; may be eligible if retained in federal ownership.
- Patented land—ineligible (includes lands tentatively approved or interimly conveyed).

Mining Development

- Areas of minor past activities and disturbance and seismic line scars—eligible
- Areas of major past and current activities—ineligible

Roads and ATV Trails

- Unimproved and unused or little used roads or ATV trails—eligible
- Improved and regularly used roads or ATV trails—ineligible

Landing Strips

- Unimproved or minimally improved strips—eligible
- Improved and maintained strips—ineligible

Cabins

- Uninhabited structures; hunter, hiker, and patrol cabins—eligible
- Inhabited structures as a primary place of residence—ineligible

Size of Units

- Greater than 5,000 acres, adjacent to existing wilderness or of a manageable size—eligible
- Less than 5,000 acres or of an unmanageable size—ineligible

Historic and Archeological Sites

- Sites not currently used or intended for primary visitor use—eligible
- Primary visitor attractions—ineligible

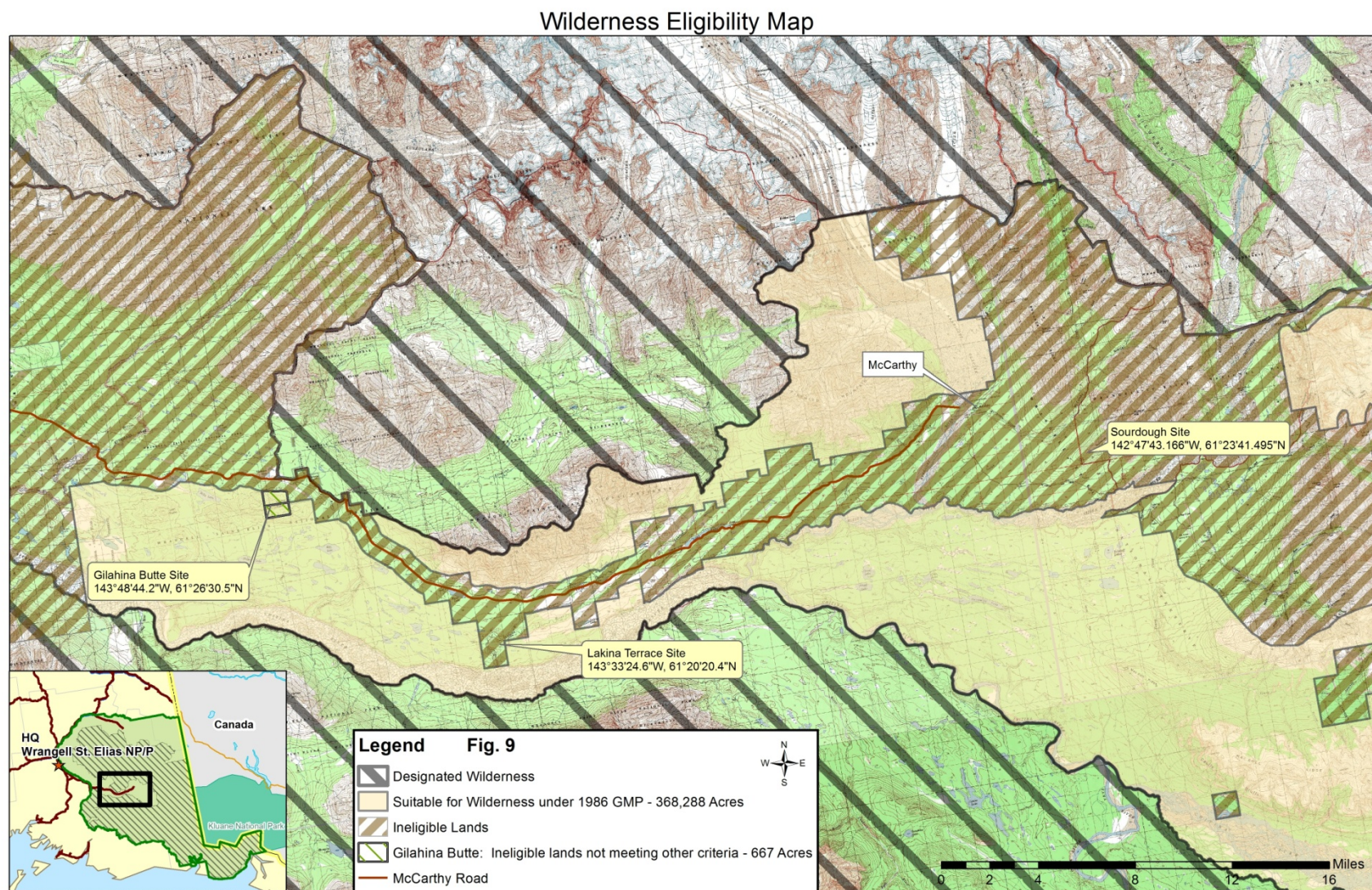


Figure 1. Wilderness Eligibility in the Project Area

In total, approximately 2,243,800 acres of nonwilderness federal lands within the park/preserve met the criteria as established by the Wilderness Act. Within the McCarthy Communications Sites EA analysis area, there were 368,703 acres of nonwilderness federal lands that met the criteria, and 285,583 acres of nonwilderness lands were found to be ineligible by either not meeting criteria or pending land applications.

III. Eligibility revision

In analyzing the effects of the CVW proposal, the EA revealed the need and opportunity to review the wilderness eligibility status of two small sites within the analysis area. To analyze the effects, we transposed the coarse level of eligibility mapping done in 1986 onto a map showing the proposed facility sites and the proposed revision (Figure 9). Based on this mapping, the following actions are appropriate at this time.

1. Propose an eligibility revision for one area, the Gilahina Butte, which should have been mapped as ineligible in 1986, based on the criteria used and described under Section II of this Appendix. At the time of the review, the Gilahina Butte already had a USGS seismic station and associated helipad that was, and continues to be, in regular use. We believe that such a developed site poses a long term non-conforming use within wilderness and should never have been included as eligible.
2. The area to be administratively removed from wilderness eligibility consists of 667 acres of land, comprised of portions of two sections that are immediately adjacent to and surrounding the site. More specifically, this area includes that southern portion of Section 9 not previously determined to be ineligible and the northern one-half of Section 16, both within Township 5 South, Range 16 East, Copper River Meridian, Alaska. Because of the proximity of the proposed Gilahina site to the section line dividing Sections 9 and 16, it was determined to be necessary to capture the northern half of Section 16 to ensure that any non-conforming activities associated with the Gilahina site occur entirely within ineligible wilderness.
3. The second area, the Lakina Terrace, was excluded from eligibility in 1986 because it was Native selected land that had been claimed and interimly conveyed out of federal ownership. The 1986 criteria list “federal land under application” as “ineligible but may be eligible if retained in federal ownership.” Eventually, the area was de-selected by the Native Corporation and the Lakina Terrace has been retained in federal ownership. While interimly conveyed lands *may* be eligible if retained in federal ownership this is not automatic. At this time the area remains in an ineligible status and a future wilderness eligibility review would be necessary to determine its eligibility.

In response to these situations, the following discussion proposes mapping revisions with the following supporting information:

Both the Gilahina Butte and Lakina Terrace sites are located within the McCarthy Road corridor. The lands on either side of the road exist in a complex matrix of environmental conditions, land status, and, relative to wilderness character—both conforming and non-conforming uses.

Since 1986, air and road traffic has increased dramatically as the area’s importance as a transportation corridor has grown. The McCarthy Road, once a seasonal, non-maintained road that ended with a tramline across the Kennicott River, is now open year-round with a vehicle bridge to the town of McCarthy. Several air taxi operators regularly traverse the corridor.

The Kennecott Mines National Historic Landmark was acquired by the NPS in 1998. With this acquisition, visitation expanded rapidly and both Kennecott and McCarthy are now major tourist destinations.

The Gilahina Butte site continues to host a USGS seismic station that is regularly used by the University of Alaska Fairbanks. Additionally, a large area deemed ineligible due to subdivided private property in 1986 is located one mile to the east of the Butte adjacent to the settlement of Chokosna. Just to the north of the Gilahina Butte and north of the McCarthy Road a very large segment of parklands was deemed ineligible due to the many hundreds of thousands of acres held in private property and as Native land claim selections.

The Lakina Terrace site, once listed as “federal land under application,” has since been retained in Federal ownership and adjoins the ROW established for the road. Constricted between the Crystalline Hills to the north and the Chitina River to the south, this narrower valley concentrates motor vehicle and air traffic, as well as their associated noise.

Numerous private dwellings are situated along both sides of the McCarthy Road. Many private inholdings that remained unoccupied in 1986 have been subsequently developed as seasonal or permanent residences. With the cumulative effect of this growth has come an increase in the frequency of sight and sound intrusions into the surrounding landscape including wilderness eligible lands.

In conclusion, we believe that the Gilahina site should never have been mapped as eligible in 1986 and that although the Lakina site has reverted to federal ownership, the matrix of impacts to the area since 1986 provides rationale for its continued status as ineligible.

APPENDIX D

HELICOPTER USE POLICY FOR WRANGELL-ST. ELIAS NATIONAL PARK AND PRESERVE

REVISED 2005

Human safety and the protection of park resources are the primary considerations during all use of helicopters within WRST. The use of helicopters in WRST will conform to all applicable laws, regulations, policies and guidelines. The Interagency Helicopter Operations Guide (IHOG <http://www.nifc.gov/ihog/>) will serve as the official guidance. The use of personal protective equipment (PPE), Aviation Management Directorate-carded aircraft and pilots, and a qualified helicopter flight manager or helicopter project manager will be required for all flights involving government employees or government contractors. All users of NPS contract helicopters are required to possess the appropriate level of training for their operations as prescribed by IHOG. The Helicopter Safety Course (DOI B-3) is the minimum requirement for all frequent fliers or if involved in special use flights. For infrequent fliers, a thorough safety briefing by the pilot will meet this requirement. In order to protect the natural, cultural and wilderness resources within WRST, and to minimize conflicts with local residents and the visiting public, the following guidelines will be followed by all federal government users, government cooperator users, or state/private helicopter users who have obtained a landing permit from the park regardless of ownership of the helicopter:

1. All non-NPS activities that require helicopter landings on federal lands within WRST require a special use permit signed by the Superintendent.
2. The helicopter pilot, project (park or other) manager, and field crews are responsible for knowing the park policy and the land status prior to commencing helicopter activities.
3. The park project manager or park contact will provide all permittees that use helicopters with a copy of the park helicopter policy and map prior to commencing operations.
4. It is the responsibility of the park project manager to ensure the use of helicopters in WRST complies with NEPA, Section 106 compliance, and WRST Wilderness policies.
5. Flights in or near sensitive areas or private/conveyed lands require advance notification to area residents by the district ranger or park project manager. Permission from the landowner is required for landings on private/conveyed lands.
6. All flights will maintain a minimum altitude of 1,000 feet above ground level (AGL) unless listed under "Exceptions to WRST Helicopter Use Guidelines" listed below or when specifically approved, in writing, by the Superintendent, or his/her designate.
7. All feasible measures will be undertaken to avoid and/or minimize impacts to backcountry users and wildlife.
8. No helicopter flights will be made over Dall's sheep habitat (above the 4,000-foot contour north of the Chitina River) from August 5 through September 20 (during sheep hunting season and the five-day period which precedes it) or any area where subsistence hunting occurs unless specifically authorized by the Superintendent.
9. Dwellings (identified on the attached map) will not be approached within a two-mile horizontal distance or 2,000 feet above ground level.
10. Hazards (identified on the attached map) include suspended cables, bridges, and aerial trams. Pilots should review the information about these sites prior to their mission.

11. Any waiver from these guidelines must be approved in writing by the Superintendent or his/her designee.
12. A flight plan must be filed with the WRST dispatcher (907-822-5236), and closed following the day's activities. A non NPS permittee may request flight following with WRST dispatch (Gulkana Operations Center). After hours a flight plan can be filed with Kenai Flight Services (1-800-992-7433).
13. Any deviation from the policy due to an emergency, helicopter mechanical problems, or aviation restrictions will be reported as soon as possible by radio or phone to the park dispatcher (907-822-5236). The dispatcher will then relay the information to both the Chief Ranger and park project manager.

Exceptions to WRST Helicopter Use Guidelines

Helicopters may fly below 1,000 feet AGL only under the following conditions:

1. Mechanical or flight problems with the helicopter.
2. Staying out of clouds or maintaining adequate visibility in bad weather.
3. Landing or taking off.
4. Law enforcement purposes.
5. Search and/or rescue or other emergency activities.
6. Message dropping or attempting to read ground-to-air messages.
7. Approved management activities (i.e., wildlife, fisheries, vegetation, fire, grazing allotment, hazardous waste, park use, subsistence and mining, maintenance, etc.) specifically covered by a project statement, management plan or plan of operations and environmental clearance.
8. Aerial photography when specifically authorized by the Superintendent.

APPENDIX E

DETERMINATION OF IMPAIRMENT

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the environmental impact statement for the preferred alternative. The description of park significance in chapter 1 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.

Impairment determinations are not necessary for visitor experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, etc., because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources and values.

Visual Resources

Implementation of Alternative 2 would cause direct impacts to visual resources. During the construction period, visual resources in the project area would be temporarily altered by the presence and activities of field crews. Visual resources would also be temporary altered during construction by the helicopters used to transport equipment and crews to the sites.

After commissioning the sites, visual resources would remain altered by the clearing of less than one acre of vegetation (trees and shrubs) and the presence of the communications facilities. Maintenance activities would also alter visual resources with helicopters visiting each site approximately six times per year. The impacts on visual resources from Alternative 2 would also include an introduction of colors and forms that do not mimic the natural environment.

Implementation of Alternative 2 would result in localized, minor but long-term impacts to visual resources. However, none would impair the purpose of the park or the integrity of any significant resources for which the park was established.

Vegetation

Implementation of Alternative 2 would cause direct impacts to vegetation. The construction of two new communications sites and the upgrade of an existing communication site would result in the loss of less than one acre of regionally common vegetation. All vegetation would be cleared for the construction of the communication facilities and helicopter landing areas at the Gilahina Butte and Lakina Terrace sites. Additional trees would be cut in the two directions that the microwave signals would travel at these two sites. All organic material would also be excavated at the Gilahina Butte site and Lakina Terrace site for tower and building foundations. The Sourdough Ridge site would require only minor clearing of vegetation and minor excavation for tower footings, as it is an existing site with adequate space for upgrading facilities. No threatened or endangered species of vegetation would be disturbed.

Indirect impacts resulting from this activity include the creation of an area suitable for establishment and propagation of invasive and exotic plant species. Trampling of surrounding vegetation could also occur during construction activities and operations due to increased access to the sites.

Localized impacts to vegetation would be high, as they would result in the loss of vegetation within the project footprint for the life of the project. However, considering the small amount of regionally common vegetation impacted relative to the 13.2-million-acre size of the park, the impacts would be minor, and none would impair the purpose of the park or the integrity of any significant resources for which the park was established.

Soils

Implementation of Alternative 2 would disturb less than one acre of shallow subsurface soils in the areas of proposed improvements at the Gilahina Butte, Lakina Terrace and Sourdough Ridge sites. Direct impacts on soils as a result of Alternative 2 would be a high intensity to a localized area and would include exposure, compaction, and direct loss of soil cover in the area of the new facilities, and exposure of soils to localized runoff and erosion. Direct impacts from the initial project activities would be highest during construction, and reduced in following years when only periodic maintenance activities would be necessary.

Topsoil removal/excavation and system installation would result in direct and indirect impacts to soils that would be high in intensity, long-term in duration, and common in context. However, the impacts would be minor because less than one acre is a negligible contribution relative to the size of the park, and none would impair the purpose of the park or the integrity of any significant resources for which the park was established.

Wildlife

Implementation of Alternative 2 would cause direct impacts to wildlife. During the construction period, wildlife in the immediate vicinity of the construction activities would be temporarily displaced. Wildlife would also be periodically displaced by the helicopters used to transport equipment and construction crews to the sites. Maintenance activities would disturb wildlife with helicopters flying to each site approximately six times per year for maintenance and propane tank refueling.

Indirect impacts resulting from this activity include the loss of less than one acre of wildlife habitat. However none of the new proposed stations would be located in wildlife sensitive areas. The area of habitat disturbance during installation and maintenance would be minimal and limited to the area immediately surrounding the equipment.

Localized impacts to wildlife would be high, as they would result in the loss of habitat within the project footprint for the life of the project. However, considering the small amount of habitat impacted relative to the size of the park, the total impact would be minor, and none would impair the purpose of the park or the integrity of any significant resources for which the park was established.

Wilderness Character and Values

The proposed action is predicated on the approval of the Wilderness Eligibility Revision proposed in Appendix C. In this case, both the Gilahina Butte site and the Lakina Terrace site would be located outside eligible wilderness and no analysis of impacts is necessary. However, due to these sites' proximity to eligible and designated wilderness, there are still possible effects to the wilderness character and values of the surrounding lands.

Untrammeled Quality

The two communication facilities proposed for construction on lands adjacent to eligible wilderness would not affect the untrammeled quality of WRST's wilderness character. Although two small areas adjacent to eligible wilderness would be cleared of vegetation, the effects would remain highly localized, would not have a widespread impact on the "community of life", and would not constitute a significant manipulation of the biophysical environment.

Natural Quality

The proposed communication facilities would leave the adjacent wilderness ecological systems substantially free from the effects of modern civilization. While local plant and animal resources, and biophysical and physical processes would be minimally impacted, the effect of the two sites on the adjacent natural quality of WRST wilderness character would be negligible.

Undeveloped Quality

The construction, operation and maintenance of the proposed communication facilities at the two sites would negatively affect the undeveloped quality of eligible lands immediately adjacent to both sites. The development of a new helicopter pad, towers, antennas and attendant equipment would affect the area's primeval character. Increased mechanization from construction would be temporary, but continuous operation and maintenance site visits would increase mechanization at the site and throughout the area.

Although less than one acre of vegetation would be cleared and removed from the sites, this would detract from the naturalness of the area. CVW proposes to clear and level up to .16 of an acre at the Gilahina site and up to .21 of an acre at the Lakina Terrace site. At the Lakina Terrace site a new helicopter landing pad would be necessary. Both sites would require 30' towers and poured concrete pads. As many as 36 trees may be removed from the line of site path of the towers. Gasoline powered generators and tracked vehicles would be used during the construction phase of this project.

The communications site on Gilahina Butte would be visible from a short section of the McCarthy Road and from the eligible wilderness immediately adjacent to the site. Both the Gilahina Butte and Lakina Terrace facilities would be visible from the air, thus posing unnatural intrusions into the view shed. Such intrusions would include actual views of the facilities as well as glare reflected by their solar panels. Other visual intrusions would include the presence of the helicopters required to construct and maintain the sites.

Solitude and Primitive Recreation Quality

Visitors would experience sound intrusions during times of construction and maintenance. Although neither site is situated within eligible wilderness, the construction and maintenance of the proposed CVW communication facilities would increase noise intrusions due to the occasional presence of field crews and helicopters necessary to access the sites.

CVW estimates that up to ten helicopter landings per year per site would be necessary to maintain these facilities, totaling approximately 30 helicopter events per year. The effect of helicopter operations on soundscapes in support of the communication facilities would detract from the wilderness solitude and primitive recreational quality of the immediately surrounding area, and would be both temporary and long term.

As described above, the action alternative would add low level, long-term, but highly localized impacts to the wilderness character and values of eligible and designated lands surrounding and adjacent to the two sites by adversely affecting its untrammeled, natural, and undeveloped qualities as well as its potential to provide solitude and primitive recreation. However, it would not result in impairment of park resources that fulfill specific purposes identified in enabling legislation of the park or that are key to the natural and cultural integrity of the park and preserve.

SUMMARY

The adverse impacts anticipated as a result of implementing the preferred alternative on a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the park's general management plan or other relevant NPS planning documents, would not rise to levels that would constitute impairment.