

APPENDIX C

Impairment of National Park Resources

In addition to determining the environmental consequences of implementing the preferred and other alternatives, NPS *Management Policies 2006* (section 1.4) requires analysis of potential effects to determine whether or not proposed actions would impair a park's resources and values.

The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of the park. That discretion is limited by the statutory requirement that the National Park Service must leave resources and values unimpaired unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values (NPS *Management Policies 2006*). Whether an impact meets this definition depends on the particular resources that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

An impact on any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

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

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

Impairment findings 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.

DETERMINATION OF IMPAIRMENT

Glacier Bay National Preserve Commercial Fishing Cabin Permit

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the environmental assessment 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.

NATURAL RESOURCE TOPICS

Vegetation

Vegetation in the Dry Bay area of the National Preserve is controlled by the wet, cool, coastal maritime climate and by geomorphologic processes. Terrestrial plant communities and wetlands are changing due to rapid isostatic rebound after deglaciation. Rapid change also results in high plant species diversity that supports a wide variety of terrestrial wildlife.

Healthy, native terrestrial vegetation is necessary to support the wildlife that Dry Bay permittees and concession lodge clients depend upon. Native plant communities are key to the natural integrity and enjoyment of the park. The preferred alternative would result in adverse impacts from an expansion of human development including small loss of vegetation (less than 1 acre), increased trampling and ORV trail development. Because there would be only slight adverse impacts, the preferred alternative would not result in impairment.

Wildlife

Dry Bay is a complex of mostly pristine tidal mudflats, sand beaches, deciduous shrublands, spruce forests, streams and freshwater wetlands, and river estuaries. This diverse, dynamic ecosystem supports many species of migratory and resident wildlife.

The project area borders Dog Salmon Creek that is used by a variety of terrestrial species and migratory birds. Large game mammals including moose and bear, furbearers including wolf,

river otter, wolverine, and mink travel along the riverbanks. Residents of Dry Bay depend on viable wildlife populations not only for commercial fishing revenue, but game for subsistence and recreational hunting, trapping, and to preserve a traditional way of life.

The actions in the preferred alternative would have a minor level of negative impact because of one additional cabin site development and increase in localized human activity. However, as the developed site covers 0.25 acre and the overall level of human activity would not increase throughout the Preserve. Because of the minor level of impact, the preferred alternative would not result in impairment.

SUMMARY

As described above, adverse impacts anticipated as a result of implementing the preferred alternative on resources or values 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.