

# Glacier Bay National Park

## Part III - Finding of No Significant Impact

June 2023



Part III - FONSI

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National Park Service  
U.S. Department of the Interior



Glacier Bay National Park  
Backcountry and Wilderness Management Plan and  
Environmental Assessment – FONSI

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**FINDING OF NO SIGNIFICANT IMPACT**  
**Backcountry and Wilderness Management Plan**  
**and Environmental Assessment**  
**Glacier Bay National Park**

May 2023

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THOMAS SCHAFF  
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Recommended: \_\_\_\_\_

Tom Schaff, Acting Superintendent  
Glacier Bay National Park

Date

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M. Sarah Creachbaum, Regional Director  
National Park Service

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# FINDING OF NO SIGNIFICANT IMPACT

## 1.1 INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an environmental assessment to examine alternative actions and environmental impacts associated with backcountry and wilderness management at Glacier Bay National Park (the park).

### 1.1.1 Purpose and Need For Action

The purpose of the environmental assessment is to enhance the preservation and protection of the park's fundamental resources and values, address new NPS planning and wilderness management requirements, and support the park in incorporating wilderness character into management decisions. The need for the environmental assessment is to provide broad guidance primarily for 2.7 million acres of terrestrial wilderness areas and a small number of wilderness waters areas and establish a framework for responding to current and future changes in visitor use in park wilderness. The environmental assessment will supplement the 1984 Glacier Bay National Park and Preserve General Management Plan (general management plan) and includes the refinement of zoning and general management direction. There is a need for the park to:

- preserve wilderness character,
- provide visitor access to tidewater glaciers,
- incorporate Tlingit Homeland values into wilderness management,
- provide guidance for commercial service providers to collaboratively achieve park desired conditions and goals,
- address conflicting use and expectations in popular areas,
- address and define desired conditions for resources and visitor experiences within and on areas adjacent to wilderness waters,
- protect wildlife and sensitive shoreline areas, and
- understand intact complex terrestrial and marine ecosystems.

### 1.1.2 Process and Document Overview

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the environmental assessment and associated decision file. Relevant sections of the environmental assessment are summarized and incorporated by reference below. The environmental assessment is available at <https://go.nps.gov/GBwild>.

The National Park Service provided two public review opportunities during the planning process. The National Park Service solicited public comments through civic engagement on a draft of the backcountry and wilderness management plan (draft plan) from July 20 to August 20, 2022. The National Park Service initiated a 30-day public comment period under NEPA from February 15 to March 17, 2023, on the revised backcountry and wilderness management plan and environmental assessment. In response to public comment, the National Park Service has reduced the number of automatic identification system (AIS) transponder sites that could be installed at new locations under this plan from 10 to 8 to reduce impacts on wilderness character quality. A summary of public comments received and responses from the National Park Service is provided in attachment A of this document. Minor modifications to the environmental assessment are provided in attachment B. Edits to the revised plan based on public comment are incorporated into the final backcountry and wilderness management plan (final plan) and associated appendixes.

## 1.2 SELECTED ALTERNATIVE AND RATIONALE FOR DECISION

### 1.2.1 Selected Alternative

The National Park Service analyzed a no-action alternative (alternative A) and an action alternative (alternative B) in detail in the environmental assessment. Based on this analysis, the National Park Service selected alternative B for implementation because it best meets the purpose and need for action without causing significant impacts on park resources. The selected alternative is described on pages 5–11 in the environmental assessment and includes programmatic and site-specific actions. Some programmatic actions will require additional NEPA and other compliance (e.g., National Preservation Act) once the scope and design for these actions are sufficiently developed, as detailed below. Actions summarized are substantively the same as described in the environmental assessment, but some minor grammatical changes have been incorporated and are disclosed in the errata (attachment B). One substantive change from the environmental assessment is the maximum number of AIS transponder sites considered. Following public comment, the National Park Service reduced the number from 10 to 8 to reduce impacts on wilderness character quality (see 1.2.1 “Trail Development” below). The changes to the impact analysis connected with this change to the action are documented in the errata (see attachment B).

**Table 1. NEPA Compliance Status for Programmatic Actions and Site-Specific Actions Under the Selected Alternative**

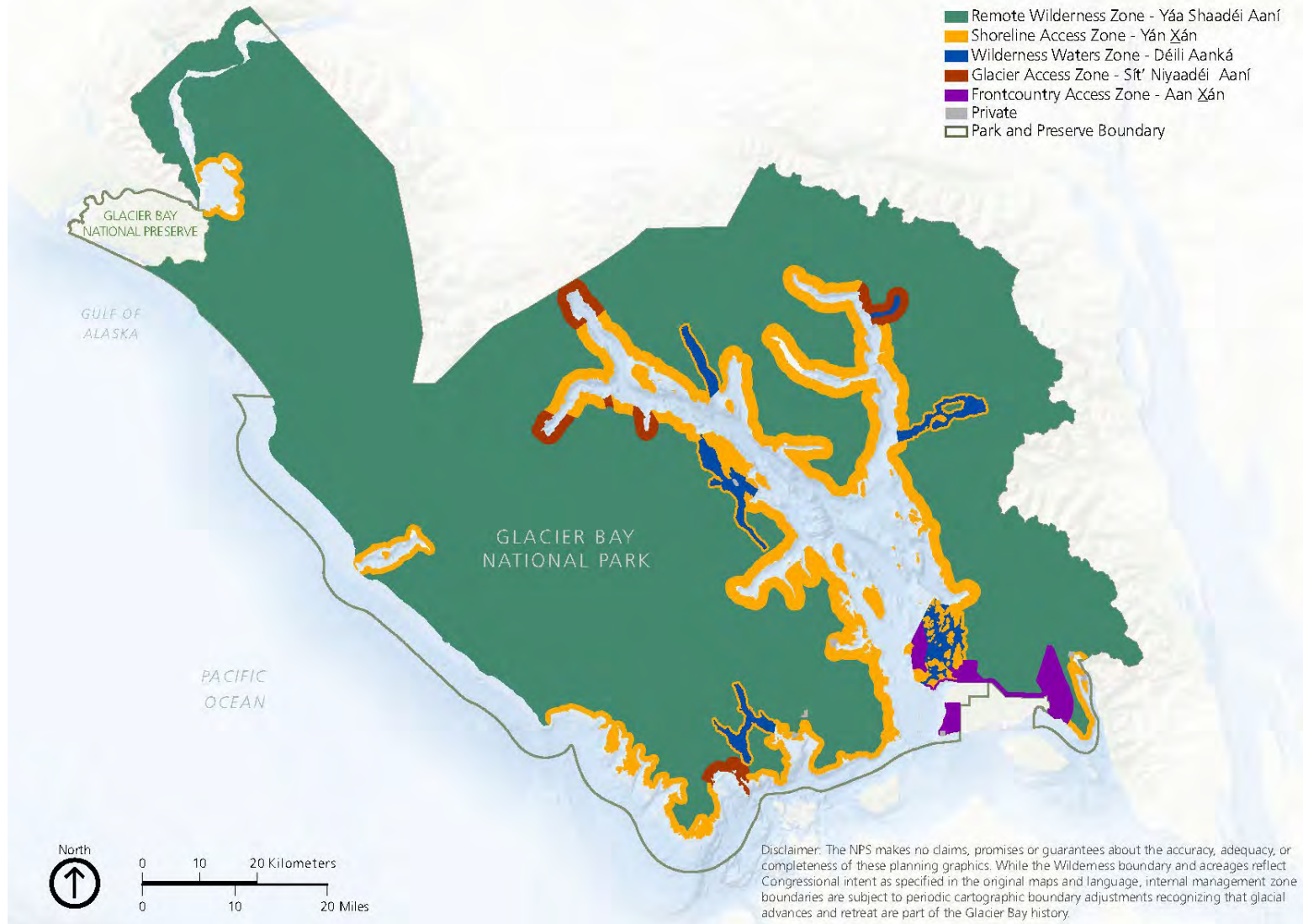
Type of Action	Specific Action	NEPA Compliance
Programmatic Actions	Broad backcountry and designated Wilderness management framework, including zoning	Compliance covered in this NEPA review.
	Communication upgrades	Further cultural resource and wetland site-specific compliance will be required and will be completed as appropriate. Subject to a future minimum requirements analysis.
	Trail development	Future NEPA compliance will be required when final design for the trail is completed. Further cultural resource and wetland site-specific compliance and permitting will be required and will be completed

Type of Action	Specific Action	NEPA Compliance
		once final design for the trail is completed. Subject to a future minimum requirements analysis.
Site-Specific Actions	Required backcountry camping permits year-round	Compliance covered in this NEPA review.
	Group size year-round and including day use	Compliance covered in this NEPA review.
	Permitting commercial mountaineering	Compliance covered in this NEPA review.

### General Management Plan Zone Refinement

Under the selected alternative, the Wilderness Lands and Wilderness Waters Zones will be further subdivided into five zones: Remote Wilderness Zone, Shoreline Access Zone, Frontcountry Access Zone, Glacier Access Zone, and Wilderness Waters Zone. A portion of the 1984 Wilderness Waters Zone has been zoned as Frontcountry Access Zone to acknowledge and manage for higher levels of use and a different type of wilderness experience in areas near the frontcountry. This action refines and details desired conditions and potential management strategies within the broader zones as a means of improving wilderness character, natural and cultural resources, and visitor experiences.

## Parkwide Management Zones



**FIGURE 1. PARKWIDE ZONING MAP OF THE GLACIER BAY WILDERNESS**



## **Communications Upgrades**

Under the selected alternative, as revised in response to public comments, the National Park Service will deploy a maximum of one very high frequency (VHF) radio repeater site in the park and a maximum of eight AIS transponder sites at new locations in designated Wilderness within the next one to three years. Per the marine management plan, AIS transponder sites will first be co-located with existing VHF infrastructure; only when co-location with existing infrastructure will not work will a completely new AIS transponder site be developed. The installation of a new communications infrastructure would require future compliance, as described in table 1. The communications infrastructure will support the automatic identification system, a vessel tracking system that uses transceivers on vessels and land-based receiver stations that transmits a vessel's position so that other vessels are aware of its position, with the goal of using the minimal number of necessary installations to achieve complete coverage of park waters. The AIS infrastructure will also enhance safety and search and rescue capabilities in the park. Currently, the sole AIS transponder site in the park is at the US Coast Guard installation at Cape Spencer.

## **Trail Development**

Under the selected alternative, the National Park Service will develop up to 10 miles of new trail from the Falls Creek area of Gustavus up Excursion Ridge through designated Wilderness. Excursion Ridge's west-facing slopes and the Falls Creek area largely comprise unstable sedimentary deposit, which may not support maintainable trails and regular foot traffic. Further surveying, investigation, and cost-benefit analysis is needed to determine if the construction and maintenance of this trail is feasible. Final trail design will require future compliance.

This trail is referred to as the Excursion Ridge trail in the environmental assessment. The purpose of the trail is to provide access through dense forested slopes to the ridge above tree line. The trail will likely be used for day trips and provide access to untracked wilderness for cross-country, multiday excursions in the alpine tundra. Visitors will have the opportunity to experience distinct ecological communities, including wetlands, forests, and alpine, as well as exceptional scenic views once on Excursion Ridge.

Design goals for this trail will include the following:

- The use of Trail Class 2 (USFS 2016) design parameters will be prioritized where the terrain can accommodate use levels without resource damage and requiring only minimized annual and cyclic maintenance. As described in the US Forest Service publication, "Trail Fundamentals and Trail Management Objectives," these trails have a tread that is continuous and discernable but narrow and rough and are constructed of typically native materials. Design tread width would be 12–18 inches. Some sections of Trail Class 3 may be needed for trail sections with challenging soil, slope, or other environmental conditions that require more substantial design elements to accommodate use. Trail Class 3 has continuous and obvious tread and a tread width of 12–24 inches, except along steep side slopes where the tread width needs to be higher for slope stability. Trail sections through the steepest slopes may require considerable engineering and a wider native ground footprint.

- The trail will be designed for the anticipated level and intensity of use.
- The trail will have 10% grade or less (90% of the time) with integrated grade reversals (drainage features incorporated into the trail alignment). Stacking switchbacks will be avoided to protect slope stability.
- Approximately 10 miles of trail may be needed to meet grade goals between the road and the alpine environment. As feasible, the trail will be routed by scenic points of interest that could also function as rest areas and turn-around points.
- Where necessary, boardwalks, small crossing features, or raised tread will be used to protect wetland function.
- The trail will have the lowest-impact bridge possible to safely move humans across Falls Creek.

### **Required Backcountry Camping Permits Year-Round**

Under the selected alternative, a backcountry camping permit will be required year-round instead of only between May 1 and September 30 for all commercial and noncommercial camping in the wilderness and backcountry. This permit will apply within all the park's wilderness and backcountry, not just the land accessed via the Glacier Bay Zone as is currently the case. Permits are a means of conveying information about park rules, conditions, and safety information. Over time, the permit system will provide the park with better information on the types, amounts, and locations of backcountry camping use.

Permits will be issued per party rather than to each individual visitor. Permits will be available in-person or online and can be acquired in advance of the trip or the day of departure. Permits will collect information, including group size, an emergency contact, length of stay, type of recreational use, mode of transportation, and a general itinerary (general camp locations and entry/exit points). If a group needs to adjust their itinerary while in the backcountry, the group will report any changes to park staff upon return from the backcountry. This permit system will be free of charge and will not involve a lottery or quota unless otherwise established in commercial operating contracts.

### **Group Size**

Under the selected alternative, the group size for the park's wilderness will remain at 12 or fewer people and will apply to both overnight and day visitors. Group size will also apply year-round instead of only between March 1 and October 31. Groups are considered separate when out of sight and sound of each other. Drop-off and pick-up locations may have more than 12 people if multiple groups arrive or depart simultaneously; however, these groups will then disperse.

Group size exceptions may be granted for educational purposes, research, safety, traditional Tlingit Homeland activities, or administrative purposes. The waiver for groups of more than 12 people must be authorized by the superintendent. Guidelines for minimizing impacts from groups of more than 12 people will be listed on the group size waiver.

## **Commercial Mountaineering**

Under the selected alternative, the National Park Service will allow a small number of commercially guided mountaineering and associated activities in the Fairweather Range. This change will officially allow a commercial recreational use that has been occurring on a temporary basis and allow park staff to continue to regulate use to protect resources. Providing this use aligns with objectives of the general management plan to encourage commercial services for the least-accessible areas of the park. An allocation of six commercial groups per year in the Fairweather Range was determined to be the appropriate maximum number needed to ensure wilderness character is maintained and resources are preserved. For all commercial mountaineering in the park, in and outside the Fairweather Range, simultaneous trips within the same area will be prohibited. For more information on the determination concerning commercial mountaineering and applicable regulations, please see the extent necessary determination (appendix B of the final plan).

### **1.2.2 Rationale**

The selected alternative best meets the purpose and need because it provides comprehensive guidance on cultural and natural resource issues, as well as visitor use management challenges in the Glacier Bay Wilderness. This alternative provides refined management guidance, including the development of management strategies to preserve and enhance wilderness character in designated Wilderness areas; establishes desired conditions for visitor use that are consistent with resource protection; identifies best practices for managing visitor use to protect resources and promote high-quality visitor experiences while meeting legal requirements; identifies appropriate commercial services through an extent necessary determination process; establishes guidance on how to integrate indigenous world views in managing Glacier Bay Wilderness lands and waters; and reevaluates the general management plan's resources. Finally, the selected alternative is the alternative that most comprehensively incorporates public, stakeholder, and tribal government feedback provided during civic engagement and responds to and incorporates feedback received during the NEPA planning process.

If the no-action alternative was selected, the park would not have updated or detailed direction for managing the park's backcountry and wilderness into the future, and none of the input from the public, tribal governments, and stakeholders gathered over the last few years would be incorporated.

## **1.3 MITIGATION MEASURES**

The National Park Service places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the National Park Service will implement multiple mitigation measures and best management practices to protect natural, cultural, wilderness resources, and the visitor experience. These measures and practices are described in detail in appendix E of the final plan and are hereby incorporated by reference. These mitigation measures and best management practices will be implemented under the selected alternative. As stated in the environmental assessment, these mitigation measures and best management practices are included as integral parts of the selected alternative.

Additional mitigation measures were not needed to reduce environmental impacts below the significance threshold, as defined by the 2015 NPS NEPA Handbook.

The National Park Service has the authority to implement the mitigation measures presented in appendix E of the final plan under the Organic Act, The National Historic Preservation Act, NPS *Management Policies 2006*, park-specific regulations at 36 CFR Part 13 Subpart N, and other federal and state applicable requirements.

## **1.4 SIGNIFICANCE CRITERIA REVIEW**

### **1.4.1 Potentially Affected Environment**

The project area includes approximately 2.7 million acres of designated Wilderness, encompassing most of the land in the park above the mean high tide line and around 53,000 acres within marine wilderness waterways. Some actions within the environmental assessment are contained to wilderness lands only, wilderness waters only, or both; therefore, the geographic and temporal scope of the analysis area varies for each resource retained for detailed analysis.

Resources within the project area that may be beneficially or adversely impacted include visitor use and experience; wetlands, vegetation, solitude or primitive and unconfined recreation quality of wilderness character; undeveloped quality of wilderness character; and Fairweather Range ethnographic resources/traditional cultural properties.

### **1.4.2 Degree of Effects of the Action**

The National Park Service considered the following actual or potential project effects in evaluating the degree of effects (40 CFR 1501.3[b][2]) for the selected alternative.

### **1.4.3 Beneficial and Adverse and Short-Term and Long-Term Effects of the Selected Alternative**

No significant impacts on resources were identified that would require analysis in an environmental impact statement. Whether taken individually or as a whole, the impacts of the selected alternative, including direct, indirect and cumulative effects, do not reach the level of a significant effect because most adverse impacts associated with implementation would be minimal, limited to a small portion of a resource (e.g., 6 acres of the park's 22,000 acres of wetlands), or temporary, lasting only as long as actions are being implemented. Best management practices and mitigation measures identified in appendix E of the final plan would further minimize any potential adverse impacts.

#### **Visitor Use and Experience**

As discussed in chapter 3 of the environmental assessment, pages 13–20, the selected alternative will result in primarily beneficial impacts on visitor use and experience, and any adverse impacts are short term, minor, or pertain to a small portion of overall park visitors. The selected alternative includes an expansion of the existing backcountry camping permit requirements to apply to all the park's wilderness year-round. Permits will continue to be

free of charge and available to anyone, online or in person, up to the day of the trip. If a group changes their itinerary while in the backcountry, they will simply report this change to the park at the end of their trip. These flexible approaches will minimize the impact on a visitor's experience while ensuring the park is able to obtain valuable wilderness use data. Over time, the registration requirement will provide the park with better information on the types, amounts, and locations of backcountry camping use. Gathering this information will help park staff determine if desired conditions are being met for a given area and allow future park managers to make informed decisions.

The selected alternative will expand the group size limit to apply to day visitors year-round. The expansion of group size limits to include November through February will occur during a time of year in which the park sees the least visitation, and therefore, this change will lead to a minimal adverse effect on few visitors. Under this alternative, there may be a slight adverse effect on a portion of day visitors, though most travel in small groups. Conversely, it may have a beneficial impact on other visitors because limiting group size may improve their ability to experience key elements of wilderness with minimal crowding and congestion in both a day and an overnight setting.

The selected alternative will have a beneficial impact on visitor use and experience by providing a hiking trail (the Excursion Ridge trail), if determined to be feasible, with multiday access to the alpine tundra, where expansive, scenic views of the park and easier off-route travel exist. The Excursion Ridge trail will be analyzed under future compliance as described in table 1 and section 1.2.1 "Trail Development" above. Visitors who do not want to hike on-trail will continue to be able to enjoy millions of acres of untrailed wilderness.

The selected alternative will allow commercial mountaineering in the Fairweather Range, with up to six trips permitted a year. Under this management approach, guide companies will know how many climbing and guiding permits will be available to potential clients each year, and visitors will know with certainty what commercial climbing and guiding services are available to them, which would have a beneficial impact on visitor use and experience. Limiting commercial mountaineering trips in the same area will preserve opportunities for solitude and a remote experience in wilderness, and it will not apply to private parties who will continue to be allowed to go where they want when they want, with the trade-off being there may be other parties in their vicinity.

The selected alternative will deploy communication systems in new locations only if co-location with existing infrastructure is not feasible. The installation of new communication infrastructure would be analyzed under future compliance, as described in table 1. This expanded communication system will improve radio communication among NPS staff throughout the park. This new infrastructure will contribute to greater connectivity during a park-supported search and rescue mission—especially in those areas that are less traveled and currently lack good communication—thereby enhancing visitor safety. Additional communication towers may affect the scenic value of the park, especially for visitors hiking in untracked wilderness within sight of these installations. Communication towers placed on high ridges several thousand feet up and several miles from boat-based visitors will not be readily visible to most park visitors without binoculars.

When the likely effects of the selected alternative are combined with other past, present, and reasonably foreseeable future actions, the cumulative impacts on visitor use and experience will continue to be beneficial. There would be an incremental beneficial cumulative impact for hikers, whose wilderness and backcountry access would improve, and mountaineers, whose wilderness and backcountry experience would improve. A minimal adverse effect may occur for a small subset of visitors due to the expansion of permit and group size requirements and the potential to see park communication towers while in wilderness. The incremental impacts of the selected alternative will contribute to, but not substantially change, the impacts that are already occurring. Ultimately, the environmental assessment did not identify significant adverse impacts on visitor use and experience, and the selected alternative will improve the visitor experience and recreational opportunities at the park.

### **Vegetation**

As discussed in chapter 3 of the environmental assessment, pages 20–25, the selected alternative is anticipated to result in minimal adverse impacts on the plant successional communities found in Glacier Bay Wilderness as a result of potential trail development and potential communication upgrades. The Excursion Ridge trail from the Falls Creek area to Excursion Ridge will result in ground disturbance and vegetation clearing. This action could subsequently increase the establishment and expansion of invasive plants in the affected vegetative communities along the proposed trail corridor. In addition, development of the trail in this area, known for its unstable soils, could increase the potential for slide events that remove swaths of vegetation. Trail design, development, and implementation mitigation measures and best management practices will be identified and implemented in future compliance to limit the encroachment of invasive plant species, minimize or avoid impacts on wetland vegetation, reduce impacts on soils and vegetation, minimize the potential for slope failures, and minimize the need to remove trees. Installation of one very high frequency (VHF) radio and up to eight AIS stations is unlikely to have any impact on vegetation outside of the immediate 100-square-foot area of each of the sites, up to 900 square feet total. Mitigation measures and best practices will minimize the possibility of introducing invasive plants. While the selected alternative will result in about 6.1 acres of vegetation loss, it is an incremental addition to the existing development footprint within these vegetation habitats and, therefore, is not expected to impact native plant species at a population level, given the localized disturbance of the action and the prevalence of the plant species in the project area.

When these effects of the selected alternative are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impact on vegetation will continue to be adverse. The incremental impacts of the selected alternative will contribute slightly to, but would not substantially change, the impacts that are already occurring. Therefore, the impacts on the vegetation environment will not be significant.

### **Wetlands**

As discussed in chapter 3 of the environmental assessment, pages 25–29, the development of the approximately 10-mile Excursion Ridge trail from the Falls Creek area to Excursion Ridge will result in the placement of boardwalks, support posts, and/or fill and vegetation clearing in some wetland locations, with a subsequent increase in the potential for the

establishment and expansion of invasive plants and shading out of native vegetation material. Mitigation measures, such as maintaining appropriate erosion and siltation controls during construction, removing temporary stockpiles as soon as possible, and properly maintaining structures and fill, will minimize both direct and indirect impacts on wetlands. Upon further design of the trail, a wetland delineation will allow for further quantification of impacts on wetlands, and a determination of whether compensation and a wetlands statement of findings will be required before trail construction.

When these effects are combined with other past, present, and reasonably foreseeable future impacts, the total cumulative impact on wetlands will continue to be adverse. The park contains over 22,000 acres of wetland habitat; therefore, impacts from the selected alternative are not anticipated to significantly alter habitat availability and/or overall wetland function within the park setting. The incremental impacts of the alternative will contribute slightly to, but not substantially change, the impacts on wetlands that are already occurring. Therefore, the impacts on wetlands will not be significant.

### **Solitude or Primitive and Unconfined Recreation Quality of Wilderness Character**

As discussed in chapter 3 of the environmental assessment, pages 29–34, the selected alternative will cause adverse impacts on opportunities for solitude or primitive and unconfined recreation. The potential installation of one VHF radio and up to eight AIS stations will decrease opportunities for solitude in the vicinity of the new communications infrastructure due to the presence of human installations and the use of helicopters to deliver materials or maintain the installations (a short-term adverse impact). However, due to the remote location and inaccessibility of most of the VHF radio or AIS sites, the silent operation of most of the equipment, and the limited time during which personnel would be actively working at each site, it is expected that a very small percentage of park visitors will be aware of them.

The potential development of the approximately 10-mile Excursion Ridge trail from the Falls Creek area to Excursion Ridge will decrease opportunities for solitude as visitation levels, and encounters with other visitors is expected to increase. Trails adversely impact the opportunity for unconfined recreation by changing both the required skill level of the visitor and how the visitor interacts with wilderness. Having a formalized trail will have an adverse impact on the visitors who prefer untrailed access to Excursion Ridge. However, wilderness users will not have to confine themselves to the trail and can continue to disperse across the other 2.7 million acres of wilderness where abundant opportunities for solitude exist.

The backcountry camping permit requirement will have a slight adverse impact on visitors' opportunities for unconfined recreation, as the geographic and temporal scope of the requirement would be slightly expanded. Still, impacts on unconfined recreation will not be significant because a permit is already required to camp in the backcountry accessed from the Glacier Bay Zone during the peak season of use, which encapsulates over 95% of people camping in the backcountry. Additionally, the system will not require visitors to make an advanced reservation to camp in the backcountry but simply require that visitors register their anticipated route and trip duration (for data collection purposes) and attend the visitor orientation.

Though the selected alternative will result in both short- and long-term adverse impacts on solitude and primitive and unconfined recreation, the impacts will not be significant because visitors will still be able to disperse across the other 2.7 million acres of wilderness and have the freedom to choose their own campsites and augment their itinerary if dictated by weather, tides, or whim. When these effects are combined with other past, present, and reasonably foreseeable future actions, the cumulative impacts on wilderness character will continue to be adverse. The incremental impacts of the selected alternative will contribute to, but not substantially change, the existing impacts on opportunities for solitude or primitive and unconfined recreation in the 2.7 million-acre Glacier Bay Wilderness.

### **Undeveloped Quality of Wilderness Character**

As discussed in chapter 3 of the environmental assessment, pages 34–37, the construction of the approximately 10-mile Excursion Ridge trail from the Falls Creek area to Excursion Ridge and the development of one new VHF radio station and up to eight AIS transponder sites will represent new developments in wilderness, and, therefore, cause adverse impacts on the undeveloped quality of wilderness character. In addition, the use of helicopters for material delivery and motorized equipment for trail construction and installations and the maintenance of VHF radio and AIS stations will result in adverse impacts on the undeveloped quality of wilderness character for the duration of the use of those tools. Use of this equipment will be subject to a future minimum requirements analysis and is expected to be infrequent, limited to short durations, and used in compliance with the park’s wilderness requirements. Mitigation measures have been developed and will be followed to reduce the impacts on this resource. In addition, the vast majority of wilderness will remain free from permanent developments. Therefore, impacts on the undeveloped quality of wilderness character will not be significant. When these impacts are combined with other past, present, and reasonably foreseeable future actions, the cumulative impacts on wilderness character will continue to be adverse. The incremental impacts of the selected alternative will contribute to, but not substantially change, the impacts that are already occurring to the undeveloped quality in the 2.7 million-acre Glacier Bay Wilderness.

### **Fairweather Range Ethnographic Resources/Traditional Cultural Properties/Cultural Landscape**

As discussed in chapter 3 of the environmental assessment, pages 37–39, the continuation and potential increase of a recreational human presence in the Fairweather Range will have adverse impacts on the feeling and association of the sacredness of the range to the Tlingit. Tlingit do not access the mountain or the range except during shamanic initiations, the last of which occurred in the 1930s (although the mountain is visited spiritually during ceremony held elsewhere). The selected alternative will permit up to six commercial mountaineering trips in the Fairweather Range per year. By defining and increasing the maximum number of permitted commercial mountaineering trips annually instead of reviewing on a case-by-case basis, there will be a corollary increase of adverse impacts on the ethnographic resources within the Fairweather Range. A recreational human presence will likely be limited to a short duration of the year, as Mount Fairweather is typically climbed during a narrow one- to two-month window in April and May. In addition, mountaineers may engage in other actions that could be considered disrespectful. However, the National Park Service will provide



education and orientation of the sacredness of Mount Fairweather to mountaineers and ensure that commercial guides are adequately trained on the importance of this resource. Though the selected alternative will result in long-term adverse impacts on ethnographic resources in the Fairweather Range, the impacts will not be significant because the National Park Service will manage commercial mountaineering with the defined restrictions and limitations placed upon it (see the extent necessary determination in appendix B of the final plan for more details; examples include no more than six trips per year, and all trips will be prohibited from entering Karst or other cave features unless a special permit is granted by the National Park Service) as part of this environmental assessment and implement best management practices and mitigation measures to reduce adverse impacts. When these impacts are combined with other past, present, and reasonably foreseeable future actions, the cumulative impacts on ethnographic resources within the Fairweather Range will continue to be adverse. However, the incremental impacts of the selected alternative will contribute to, but not substantially change, the existing impacts on ethnographic resources within the Fairweather Range.

### **Degree to Which the Proposed Action Effects Public Health and Safety**

The selected alternative will improve public health and safety and includes potential communication upgrades (VHF radio and automatic identification system) intended to improve communication between vessel operators throughout the park. These upgrades will contribute to greater connectivity during a park-supported search and rescue mission—especially in those areas that are less traveled and currently lack good communication—thereby enhancing visitor safety and potentially reducing response times. Expanding the camping permit requirements to all areas of the backcountry year-round will also help improve visitor safety, as park staff will have details about visitor trips and could perform more efficient search and rescue operations by having a location from which to begin the search.

For safety reasons, segments of the Excursion Ridge trail that are under active construction will be temporarily closed to the public as needed. The temporary closures of segments of the trail for construction purposes is expected to occur over the course of two or three summer seasons. Details on closure times and durations will be posted for the public at the trailhead and other town locations and on the park website and social media outlets.

### **Effects That Would Violate Federal, State, Tribal, or Local Law Protecting the Environment**

The selected alternative does not threaten or violate applicable federal, state, or local environmental laws or requirements imposed for the protection of the environment.

## **1.5 PUBLIC INVOLVEMENT AND AGENCY CONSULTATION**

### **1.5.1 Civic Engagement**

Public and stakeholder input to inform the planning process was gathered during two 60-day outreach periods in 2020 and 2021 and a 30-day public review period on the draft plan in 2022. Key issues brought forward during this input included a desire to retain Glacier Bay's exceptional wilderness and backcountry visitor experiences, resources, and values for the future; the significance of the place for different people; and the importance of the National Park Service evolving and optimizing future management, including to recognize and honor the rich cultural tapestry of indigenous use and occupation in the backcountry and support the enduring connection between the Tlingit and their Homeland.

### **1.5.2 Environmental Assessment Public Comment Period**

From February 15 through March 17, 2023, the National Park Service held a public comment period under NEPA regulations to receive feedback on the revised plan and environmental assessment. A news release was made available to the public on February 15 that described the purpose and contents of the revised plan and environmental assessment. The news release also informed readers on how to submit comments and how to attend a public meeting. In addition to the news release, NPS staff hosted two public listening sessions to provide interested members of the public with an opportunity to learn more about the planning effort and share their ideas. The first was held in Gustavus, Alaska, on February 21, and the second was a virtual public meeting on February 22. A total of 22 people attended the two public listening sessions. In addition to the news release, public listening opportunities were posted on the park's Facebook page and the National Park Service Planning, Environment & Public Comment (PEPC) page and were recorded and made available for public viewing on YouTube.

During the public comment period, the National Park Service received 1,773 individual correspondences directly on the PEPC website, via e-mail, or through mail correspondence. Comments were received from 50 states; the District of Columbia; two US territories, including Puerto Rico and Northern Mariana Islands; and 17 foreign countries. In addition to public comments, the National Park Service received letters from official representatives of the following agencies and organizations:

- State of Alaska, Alaska National Interest Lands Conservation Act (ANILCA) Program
- Biodiversity Conservation Center
- Friends of Glacier Bay
- Pinheironeto Advogados
- Tidelines Institute

- Vermont Association of Area Agencies
- Wilderness Watch

National Park Service responses to public comments are included in attachment A. No substantive comments were received that resulted in changes to the assessment of impacts or increases in the level of adverse impacts acknowledged in the environmental assessment.

### **1.5.3 Agency and Tribal Consultation**

Under the Endangered Species Act and the Marine Mammal Protection Act, the National Park Service determined that the selected action would have no effect on threatened endangered, and proposed listed species; designated critical habitat; candidate species; migratory birds; or marine mammals. The National Park Service sent a letter to the US Fish and Wildlife Service notifying them of this determination on February 15, 2023.

The National Park Service sent a letter to the State Historic Preservation Officer (SHPO) on February 15, 2023, for formal consultation under section 106 of the National Historic Preservation Act for the selected alternative. The State Historic Preservation Officer, on March 17, 2023, concurred with the finding of no historic properties adversely affected by the selected alternative. The State Historic Preservation Officer noted that a reevaluation of concurrence may be needed if changes are made to the project's scope or design or if comments are received from other consulting parties. If unidentified cultural resources are discovered during the project, work must be interrupted until the resources have been evaluated for National Register of Historic Places criteria in consultation with the State Historic Preservation Officer. Finally, the concurrence noted that some sites can be deeply buried and that fossils are considered cultural resources subject to the Alaska Historic Preservation Act. Actions requiring future compliance will undergo a site-specific section 106 SHPO consultation.

The National Park Service met with the ANICLA program on February 22, 2023, to discuss the proposed Excursion Ridge trail. The proposed trail would cross state lands (about 0.5 miles) and include a river crossing. The trail and associated bridge will be funded through federal allocations. During the February meeting, the meeting attendees suggested establishing a working group with representatives from the park, the state, the town, and other stakeholders to agree on the final design and trail alignment. Once final designs and crossing locations are identified, additional consultation and compliance will also occur. The park will apply for an easement for the trail between the road and the park boundary.

The planning effort has been informed by ongoing, informal, and formal government-to-government consultation with the Hoonah Indian Association and Yakutat Tlingit Tribe, representing the original people and stewards of Glacier Bay. These federally recognized tribal governments represent the interests of their respective tribal members, the Huna Tlingit and the Yakutat Tlingit. The National Park Service collaborated with both tribes to ensure that the final plan and environmental assessment addressed longstanding tribal priorities, advanced challenging conversations about Homeland values, and established a

clear pathway for collaboratively resolving challenging issues. Aspects of the process included:

- Regular ongoing conversations with tribes, the park tribal coordinator, and the park superintendent
- Advance copies of draft newsletters before 60-day public input periods in 2020 and before a 30-day draft plan review in 2022, with an invitation for input
- Pre-release tribal review of all language related to Homeland and other cultural issues
- An in-person government-to-government meeting among park staff and tribes during the 30-day public review of the revised plan and environmental assessment (February 2023)

The final plan features tribal ethnographic and Homeland content and incorporates Tlingit language to encourage readers to consider the concepts presented here through the world view of those who consider Glacier Bay National Park designated Wilderness as Homeland.

While ANILCA and NPS regulations prohibit subsistence uses in the park, the National Park Service completed a section 810 analysis (appendix F of the final plan) in accordance with Title VIII, Section 810 of ANILCA to evaluate potential restrictions to subsistence activities resulting from the selected alternative. The National Park Service concluded that the selected alternative will not result in a significant restriction of subsistence uses.

## **1.6 FINDING OF NO SIGNIFICANT IMPACT**

Based on the information contained in the environmental assessment, the National Park Service has determined that the selected action does not constitute a major federal action having a significant effect on the human environment. Therefore, an environmental impact statement will not be required.

This finding is based on consideration of Council on Environmental Quality criteria for significance (40 CFR 1501.3 [b]) regarding the potentially affected environment and degrees of effects of the impacts described in the environmental assessment.

## ATTACHMENT A: PUBLIC COMMENT RESPONSE REPORT FOR THE REVISED BACKCOUNTRY AND WILDERNESS MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT

The Glacier Bay National Park Revised Backcountry and Wilderness Management Plan (revised plan) and Environmental Assessment were made available for public review during a 30-day period from February 15 through March 17, 2023.

The National Park Service received 1,773 correspondences, which were documented on the NPS Planning, Environment and Public Comment (PEPC) website from individuals, organizations, federal and state agencies, and gateway communities.

The following are NPS responses to concerns that were raised by commenters on the revised plan and/or environmental assessment. Responses to all substantive comments are included here. Substantive comments are those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

In addition, this section includes responses to some non-substantive comments, identified as being of high importance to the public or needing clarification. The page numbers referenced are from the February 2023 revised plan and environmental assessment.

The errata documents changes (corrections and minor revisions) to the text of the environmental assessment as a result of comments received on the environmental assessment during the public review process, as well as other corrections. Edits to the revised plan based on public comment and other corrections are incorporated directly into the final backcountry and wilderness management plan (final plan) and associated appendixes.

**Comment Topic:** A commenter expressed concern that by establishing and maintaining a major formal backcountry trail—the Excursion Ridge trail—deep into the park's remote wilderness and far from the Bartlett Cove frontcountry, the National Park Service may perform similar trail construction in the future that is sure to incrementally degrade wilderness character.

**NPS Response:** The National Park Service acknowledges that additional trails may be built in the future away from the Bartlett Cove frontcountry area; these types of facilities are included in the desired conditions and management direction for the Shoreline Access Zone. However, the National Park Service is not proposing any additional trails at this time. While NEPA requires that an agency must include reasonably foreseeable future actions in the description of environmental consequences for the proposed action, reasonably foreseeable future actions do not

include actions that are speculative or indefinite (43 CFR 36.30). The impacts of theoretical future trails are beyond the scope of this environmental assessment.

**Comment Topic:** A commenter suggested establishing a no-take marine reserve in Glacier Bay, such as within Muir Inlet.

**NPS Response:** This comment extends beyond the scope of the project.

**Comment Topic:** A commenter reiterated concerns about the Bartlett River Trail and Point Gustavus Route analyzed and approved through the 2019 frontcountry management plan, including impacts on wilderness character and wildlife. Commenters suggested other options for developing accessible trails in the park's frontcountry.

**NPS Response:** The Bartlett River Trail and Point Gustavus Route and their environmental effects have been considered and analyzed in the frontcountry management plan. Per public comment on the environmental assessment, the National Park Service rerouted the Bartlett River Trail away from the mouth of the tidal cut and portions of the shoreline. The National Environmental Policy Act does not require that decisions contained in valid management plans and the finding of no significant impact be revisited in other management plans. Actions to expand accessible trails in the Bartlett Cove frontcountry are beyond the scope of this plan.

**Comment Topic:** Commenters expressed disagreement with zone justifications and suggested a range of zone boundary adjustments.

**NPS Response:** The National Park Service has considered many factors in determining the scope and rationale for each zoned area of the backcountry and wilderness, including public and stakeholder feedback and the subject matter expertise of park staff. Each proposed zoning change was carefully considered by the project team. The zoning changes proposed by commenters either would have been inconsistent with desired conditions for a given area, would have created conflicts with other park goals and policy directives, or would have created micro-zones that would have been impracticable for management.

**Comment Topic:** Commenters requested that the boundaries of each zone be more precisely defined in the revised plan.

**NPS Response:** The boundaries are described in written form and detailed in maps in the final plan. The final plan also acknowledges: "Although the zones are presented as exact distances and locations, those are based on the ecological knowledge at the time of publication of the plan. As successional landscapes change, the viewshed and experience would also change. Over time, the five zone boundaries may need to be modified due to climate change or other natural forces to meet the park's purpose and intent. Specifically, these adjustments would ensure the park is providing opportunities to access tidewater glaciers, per the park's enabling legislation and protecting resources and visitor experiences in alignment with the intent of the zoning descriptions below." Minor text amendments have been made for clarification to the descriptions of the Remote Wilderness Zone and the Shoreline Access Zone in the

“Management Direction for Backcountry and Wilderness Zones” section of the final plan.

**Comment Topic:** Commenters expressed concern that the revised plan creates zones that allow for the development of communication and research installations and trail and campsite constructions, resulting in wilderness areas that are less protected. They expressed concern that such zoning violates NPS policy that “management zoning or other land use classifications cannot and will not diminish or reduce the maximum protection to be afforded lands with wilderness values. Transition zones adjacent to wilderness may be identified to help protect wilderness values, but no transitional or "buffer" zones are appropriate within wilderness boundaries.”

**NPS Response:** NPS *Management Policies 2006*, sections 6.3.10.1, 6.3.10.2, and 6.3.10.3 allow for administrative facilities (e.g., radio repeater sites), trails, and campsites, respectively, within wilderness when those facilities meet the conditions set in NPS *Management Policies 2006* and are in accordance with the Wilderness Act. Therefore, zones that allow the development of these facilities in a way that is consistent with NPS *Management Policies 2006* and the Wilderness Act do not lower the level of protection afforded areas with wilderness values. The National Park Service acknowledges concerns about impacts on wilderness character and proposes measures to reduce and mitigate these impacts in “Appendix E: Best Management Practices and Mitigation Measures.” Per NPS *Management Policies 2006*, the park would use the minimum requirement concept to evaluate necessity and apply a minimum requirements analysis to any future proposed or potential actions to define routes, construct sustainable trails, designate campsites, or place installations to ensure that impacts on wilderness resources and character are minimized.

**Comment Topic:** Commenters expressed concern that the National Park Service was proposing to change wilderness boundaries by designating some wilderness waters as “Frontcountry Access Zone” rather than “Wilderness Waters Zone.”

**NPS Response:** Certain wilderness waters were zoned as Frontcountry Access Zone because the desired conditions are different in those areas than for other wilderness waters zoned as Wilderness Waters Zone. However, the National Park Service is not proposing to change any wilderness boundaries as a result of the final plan. Any changes to wilderness boundaries would require an act of Congress.

**Comment Topic:** Commenters stated that the preferred alternative includes activities prohibited by the Wilderness Act that would degrade the wilderness character of the park, such as placing permanent structures with instrumentation within wilderness, using a helicopter to access several of the station sites, and using motorized tools for installation and maintenance. Commenters did not feel the park considered other technology and methods of communication for use in the park’s backcountry and wilderness, such as satellite phones. One commenter expressed concerns about the noise from helicopters that would result from the installation and maintenance of one VHF repeater and up to nine AIS stations and asked if the National Park Service had considered ways to reduce the number of installations or considered other means to reduce helicopter use.

**NPS Response:** Activities such as the placement of installations within wilderness and helicopter landings are prohibited by the Wilderness Act unless they are determined to be those minimally necessary for the administration of the area for the purpose of wilderness.

The National Park Service has determined communications to be of such importance that a mission/project may be cancelled if reliable communication with dispatch cannot be achieved. Failure to have adequate radio coverage would result in a lack of emergency response capabilities and would disable routine communications. Very high frequency radio is an essential service for park staff, and other existing technologies do not provide the same level of coverage and reliability within the park. The automated identification system, an automatic vessel tracking system, improves collision avoidance for marine vessels, including those vessels traveling through wilderness waters, and would enhance safety and search and rescue capabilities in the park. The receipt of AIS signals within many areas of the park is limited by topography and the distance an AIS system can transmit. In the upper arms, most side fjords, and the outer coast, the only signals received are by satellite with hours-long gaps between transmissions. These receivers can also be outfitted to transmit information to vessels, such as crossing into whale waters or reporting weather; enhance/extend VHF radio signals for verbal conversations; and collect aircraft ADS-B signals.

As noted in the final plan, new installations in designated Wilderness will be considered only when co-location with existing infrastructure or installation outside of wilderness is not feasible and it is determined to be the minimum tool necessary to support park goals. Existing VHF radio repeaters would then be co-located onto the new installations to minimize the number of installations that require regular maintenance. In response to public comment, the National Park Service has reduced the number of new AIS installations that could be installed under the final plan from 10 to 8. As stated in the preferred alternative, access to the sites for installation and maintenance would occur by foot, boat, float/ski plane, or kayak; only when areas are too dangerous or remote for access by those means would a helicopter be considered, and helicopter use would be subject to minimum requirement analyses. The National Park Service acknowledges that the installation and maintenance of radio repeaters and AIS transponder sites will impact wilderness character quality; these impacts are described and evaluated in chapter 3 of the environmental assessment.

Throughout most of the park wilderness, visitors will continue to have the opportunity for solitude or primitive or unconfined recreation. However, the National Park Service acknowledges that the preferred alternative can impact these opportunities for some visitors in specific areas. Noise or views of low-flying aircraft on maintenance visits can disturb visitors, though the frequency and duration of these visits will be low.

**Comment Topic:** The final plan should only allow research in the Glacier Bay Wilderness that is compatible with wilderness and does not require section 4c-prohibited uses, including installations.



**NPS Response:** The National Park Service has a responsibility to support appropriate scientific activities in wilderness, both as an enabling proclamation of park purpose and also to use science to improve wilderness management. Per *NPS Management Policies 2006*, scientific activities involving prohibitions identified in section 4(c) of the Wilderness Act (16 USC 1133[c]) may be conducted within wilderness when the conditions outlined in *NPS Management Policies 2006*, section 6.3.6.1, are met, including determining that the project is appropriate or necessary for the administration of the area as wilderness, and that the prohibited use constitutes the minimum requirement necessary to accomplish the research objectives in accordance with the Wilderness Act. The text of the “Wilderness Character” section of “Appendix E: Best Management Practices and Mitigation Measures” in the final plan has been updated to clarify this intent.

**Comment Topic:** A commenter questioned if the Excursion Ridge trail would be used and whether the visitor demand for this trail would justify the resources and wilderness character impact.

**NPS Response:** Through the planning process, the park has received many comments and feedback from the public supporting the development of a new backcountry trail up to Excursion Ridge. Future compliance will be required before constructing a trail. The intention for constructing this trail would be to offer something different to visitors in the Bartlett Cove and Gustavus area than what is currently available and would not duplicate an experience that already exists. The trail would offer visitors a wider spectrum of hiking opportunities and park experiences in terms of trail location, length, habitat type, and scenery. The proposed trail would also offer additional access to the Glacier Bay Wilderness for visitors who may not have the time, financial resources (i.e., hiring a commercial boat or plane), equipment, skill, or desire to venture into more remote areas of the park or areas only accessible by water. Chapter 3 of the environmental assessment, pages 20–37, discusses impacts on resources and wilderness character.

**Comment Topic:** A commenter suggested that the final plan should consider campfire bans and wildland fire management, given the potential impact of climate change to increase the unit’s vulnerability to wildfires and disrupt the natural wildfire regime.

**NPS Response:** The National Park Service dismissed banning campfires along shorelines as a potential management tool for preventing the burning of interstadial wood, which is prohibited under 36 CFR 13.1110. Educating the public about the ecological importance of interstadial wood and the impacts of burning it was determined to be a more effective management tool, and banning campfires would adversely impact the wilderness character quality of primitive and unconfined recreation. The National Park Service acknowledges the need to potentially restrict campfires due to climate change and other factors. Under the current superintendent’s compendium, state or local fire burn bans are automatically adopted unless the superintendent determines the ban is not necessary in park areas. The National Park Service intends to develop a park-specific fire management plan with

more locally specific guidance on fire-wise prevention activities to reduce the risk of wildfire in the future, which would be available for public comment.

**Comment Topic:** A commenter suggested that the final plan should provide guidance on responding to potential landslides in areas with visitation.

**NPS Response:** Per the revised and final plan, “. . . if it becomes necessary to proactively manage travel in any area to achieve desired future resource and social conditions for an area, to reduce visitor conflict, or to protect visitor safety, the National Park Service would generally start with the least restrictive mechanism or “tool” necessary to accomplish the goal.” This action could include managing travel in areas where there are significant safety risks from landslides or other environmental hazards. Additional guidance on managing for dynamic landscapes and hazards can be found in the marine management plan.

**Comment Topic:** Commenters expressed concern that allowing commercial uses in wilderness is incompatible with the Wilderness Act of 1964.

**NPS Response:** Section 4(c) of the Wilderness Act prohibits commercial enterprise within designated Wilderness; however, section 4(d) of the act adds clarifying language on the topic of commercial services. Section 4(d)(6) of the Wilderness Act states that “commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.” As stated in the act, these public purposes include recreational, scenic, scientific, educational, conservation, and historical use. Please see appendix B of the final plan for detailed rationale of the extent to which these services may be provided within Glacier Bay Wilderness.

**Comment Topic:** Commenters expressed concern regarding the implementation of a backcountry permit system year-round for overnight users and questioned the analysis of impacts on unconfined recreation. While there was some support for this action, other commenters suggested limiting permits for areas of emerging visitation (e.g., Dundas Bay, Excursion Ridge) or where visitor conflict occurs.

**NPS Response:** The National Park Service currently requires visitors who are accessing shoreline wilderness from the Glacier Bay Zone to obtain a backcountry permit between May 1st and September 30th. The final plan proposes to expand the backcountry camping permit to year-round and parkwide to better communicate important information about park rules, conditions, and safety information. Furthermore, this system allows park staff to collect data regarding the types and amounts of visitor use within the remote wilderness and monitor if resource impacts begin to occur. While the environmental assessment identifies some impacts on unconfined recreation as a result of this action, it notes that such impacts would be slight because wilderness campers would still have the freedom to choose their own campsites and allow their trip to unfold as weather, whim, and tides dictate.

While the National Park Service appreciates the proposal to limit permits for areas of emerging visitation, the final plan identifies a series of management progressions that

park staff may implement if monitoring suggests that desired conditions are not being maintained or achieved. These progressions begin with the least restrictive actions, such as education and voluntary measures, and shift to more restrictive actions such as regulating the number of visitors or implementing temporal restrictions. The National Park Service does not feel that regulating the number of backcountry visitors at this time is necessary, but such actions may be taken in the future.

**Comment Topic:** A commenter expressed confusion that the revised plan dismissed strategic stream crossings to facilitate beach hiking as an action yet acknowledges that the Point Gustavus Route will have “a few well-placed stones or small modifications to aid stream crossing.”

**NPS Response:** The Point Gustavus Route and its environmental effects were considered and analyzed in the frontcountry management plan. In the revised plan and environmental assessment, the National Park Service considered but dismissed any additional maintained stream crossings beyond those already proposed and analyzed in the frontcountry management plan for the Point Gustavus Route. The National Environmental Policy Act does not require that decisions contained in valid management plans and findings of no significant impact be revisited in other management plans.

**Comment Topic:** Commenters questioned the methodology and findings of the environmental assessment because the National Park Service considered the importance of impacts of the proposed Excursion Ridge trail on the wilderness character quality of solitude or primitive and unconfined recreation relative to the park’s entire acreage rather than the more limited Excursion Ridge area.

**NPS Response:** The environmental assessment acknowledges that on pages 32–33 constructing a new trail in wilderness would likely lead to an increase in the number of visitors recreating on Excursion Ridge; this increased use will likely lead to increased visitor encounters along the trail and increased sounds of human activity, reducing opportunities for solitude in this area of wilderness. Visitors can still find solitude by choosing alternate, off-trail routes to access Excursion Ridge or by dispersing into the 1.6 million acres of untrailed wilderness not covered by glaciers. The National Park Service has determined that impacts on the wilderness character quality of solitude or primitive and unconfined recreation will not be significant.

**Comment Topic:** Commenters expressed concerns that any development of trails and campsites would lead to the degradation of wilderness character.

**NPS Response:** The National Park Service acknowledges that the development of trails and campsites could have adverse impacts on wilderness character. The National Park Service proposes measures to reduce and mitigate these impacts on wilderness character in the “Appendix E: Best Management Practices and Mitigation Measures.” National Park Service *Management Policies 2006*, section 6.3.10.2, states that trails will be permitted within wilderness when they are determined to be necessary for resource protection and/or for providing for visitor use for the purposes of wilderness; section 6.3.10.3 says that campsites may be designated when essential

for resource protection and preservation or to meet other wilderness management objectives. The park would use the minimum requirement concept to evaluate necessity and apply a minimum requirements analysis to any future proposed or potential actions, such as defining routes, constructing sustainable trails, or designating campsites, to ensure that impacts on wilderness resources and character are minimized.

**Comment Topic:** Commenters expressed concerns that the National Park Service did not conduct a cumulative effects analysis of all the current helicopter use in the wilderness, including for the Remote Automated Weather Stations (RAWS) that the National Park Service approved in 2015 but which are not once mentioned in the revised plan and environmental assessment.

**NPS Response:** On page 36 of the environmental assessment, the National Park Service states that the ongoing use of helicopter landings in wilderness for administrative purposes, which includes the installation and maintenance of the remote automated weather stations, impacts the undeveloped quality of wilderness and opportunities for solitude. The environmental assessment acknowledges that when the effects of the action alternative are combined with other past, present, and reasonably foreseeable future actions, the cumulative impacts on wilderness character would continue to be adverse, although not significant because the use of helicopters would be subject to a future minimum requirements analysis and is expected to be infrequent, limited to short durations, and used in compliance with the park's wilderness requirements, including best practices and mitigation measures listed in appendix E.

**Comment Topic:** A commenter requested that the National Park Service include and identify state-owned lands and waters within the park and provide examples of such lands.

**NPS Response:** The management of lands and waters within the Alsek corridor and Glacier Bay National Preserve are outside of the scope of this planning effort. For the limited areas referenced within the geographic scope of the final plan, the National Park Service does not necessarily concur with the state's determination of navigability.

**Comment Topic:** A commenter requested that the National Park Service describe consultation with the Alaska Department of Fish and Game in the environmental assessment.

**NPS Response:** On page 42 of the environmental assessment, text has been updated via the errata to describe consultation with the Alaska Department of Fish and Game.

**Comment Topic:** A commenter requested that the National Park Service outline supplementary guidance and agency direction for the management of wilderness in Alaska, including the Alaska Supplement to the Minimum Requirements Decision Guide (2006), direction from the Wilderness Stewardship Reference Manual 41, and Keeping it Wild 2 in the National Park Service.

**NPS Response:** Reference Manual 41 is listed in "Appendix G: Select Laws, Regulations, Policies, and Guidance," and Keeping It Wild in the National Park

Service has been incorporated into Reference Manual 41 as section 6.3. The 2016 Alaska Supplement updated and replaced the 2006 supplement; however, this document is an optional guidance document and is not NPS policy.

**Comment Topic:** A commenter requested that the National Park Service include the wilderness character monitoring strategy as part of the revised plan so that the public and partners can shape the monitoring plan.

**NPS Response:** The National Park Service is required by Director’s Order 41 and Reference Manual 41 to develop and implement a wilderness character monitoring strategy, henceforth referred to as a wilderness character baseline assessment. All references to “wilderness character monitoring strategy” in chapter 4 of the final plan have been changed to “wilderness character baseline assessment.” While the National Park Service is not required to make the wilderness character baseline assessment publicly available, the National Park Service intends to publish the final version later this year.

**Comment Topic:** Commenters noted that the encounter rates are qualitatively described and should have specific numbers detailed in the final plan so that managers can understand clearly, through monitoring, when action to achieve zone-specific desired conditions should be taken.

**NPS Response:** The encounter rates are described in the desired conditions, which are defined by the Interagency Visitor Use Management Council (IVUMC 2016) as statements of aspiration that qualitatively describe what the park is trying to achieve. The park is developing a wilderness character baseline assessment (previously referred to as a “wilderness character monitoring strategy”), which includes monitoring encounter rates in different areas of the park. This monitoring will allow the National Park Service to track trends in encounter rates over time and inform future management decisions. While the National Park Service is not required to make the wilderness character baseline assessment publicly available, the National Park Service intends to publish the final version later this year.

**Comment Topic:** A commenter requested that the National Park Service make the visitor capacity analysis available to the public to inform review of the extent necessary determination.

**NPS Response:** The extent necessary determination (appendix B of the final plan) evaluates the extent to which commercial services are necessary to achieve the purpose of wilderness and in the case of Glacier Bay National Park, serves as a standalone, independent analysis from the visitor capacity analysis. The identification of visitor capacity is a requirement per the 1978 National Parks and Recreation Act for national parks to meet their statutory requirements. The National Park Service is not required to make the visitor capacity analysis publicly available or seek public comment; therefore, it was not released to the public.

**Comment Topic:** A commenter was concerned that the revised plan emphasizes restricting visitor use associated with commercial operations as the primary management tool to

maintain wilderness character and does not provide any data on documented user conflicts or impacts on resources to support the need to implement such restrictions.

**NPS Response:** The park's general management plan established direction for the management of commercial services throughout the park, namely that commercial services would be permitted for access to more remote areas of the park. The extent necessary determination, a component of the final plan, evaluates the extent to which commercial services are necessary per the requirements of the Wilderness Act. Furthermore, the final plan includes management progressions that direct the National Park Service to start with the least restrictive mechanism or tool necessary to accomplish the goal. National Park Service policy is to take proactive measures to prevent adverse impacts from occurring. Therefore, an expectation that visitation patterns or trends are likely to impact resource conditions is sufficient to implement a response.

**Comment Topic:** A commenter suggested that the requirement for noncommercial overnight users to hold a backcountry permit is a closure under ANILCA Section 1110(a) and the National Park Service should follow the procedural steps required under 36 CFR 13.50 for notice and hearing to comply with ANILCA and federal regulations. The commenter also expressed concerns that there may be online service fees for backcountry permits.

**NPS Response:** The National Park Service disagrees that requiring a backcountry permit for overnight use is a closure under ANILCA 1110(a). Because the permit requirement does not restrict the methods of transportation that are authorized under ANILCA 1110(a), the closure procedures at 43 CFR 36.11(h) are not applicable. While overnight users will need to register to receive a permit, there is no limitation being placed on the number of overnight users. As stated in the revised plan, over time, the permit system will provide the park with better information about the types, amounts, and locations of backcountry camping use so that the National Park Service can use the least restrictive mechanisms possible to achieve desired conditions for visitor experience and resources.

The National Park Service is committed to keeping permits free of charge and has revised the text in the "Management Actions Common to All Zones" section of chapter 3 of the final plan to clarify this intent.

**Comment Topic:** A commenter suggested that public use shelters and cabins can be considered consistent with Alaska wilderness based on ANILCA's allowances of cabins and shelters and other structures to provide the wilderness experience for a variety of outdoor skill levels and that the National Park Service should include an alternative that considers public use cabins. The commenter suggested text changes for the dismissal of public use cabins and shelters.

**NPS Response:** Primary travel in Glacier Bay is via marine vessels within park waters, and these vessels provide opportunities for overnight stays, either through private vessel or commercial or chartered vessels. Other considerations involved in not pursuing cabins and shelters in the backcountry include the dynamic marine setting (i.e., steep costs and operational demands relative to public benefit) and the Glacier

Bay-specific marine conditions, where emergency assistance is typically offered by passing boats, US Coast Guard helicopters, or park vessels. Additionally, between the range of existing vessel-based options and the range of recreational opportunities included in the frontcountry management plan, the National Park Service believes that it provides a diversity of recreational experiences and overnight accommodations across the planning portfolio, and not all these experiences need to be included in designated Wilderness. The National Park Service will reevaluate if or when there is a substantial glacial retreat in areas that would require significant overland travel or other means necessary to access glaciers and glacial features.

Text changes were suggested for the dismissal, but the National Park Service declines to include them because they are not relevant to the conditions at Glacier Bay National Park and don't improve public understanding of why the action was considered but dismissed.

**Comment Topic:** A commenter suggested that the environmental assessment should provide a third alternative that both adds the Falls Creek to Excursion Ridge trail on state lands and retains the existing trail from Bartlett Cove to Bartlett Lake in designated Wilderness.

**NPS Response:** The National Park Service is not removing the Bartlett Lake Trail; the proposed action is to manage the trail as a different trail class and to blaze the trail so that it will be easier to follow year-round. This proposed alternative is effectively a combination of the action alternative, which includes the Excursion Ridge trail, and the no-action alternative, which makes no changes to the Bartlett Lake Trail. This does not constitute a distinct alternative under NEPA, as the difference between this and alternative A and alternative B is not based on their approaches to resolving the purpose and need. It does not provide a substantively different option to the decision maker.

**Comment Topic:** A commenter suggested that the National Park Service should include reporting invasive species to the State of Alaska as a best management practice.

**NPS Response:** The National Park Service has incorporated this change into "Appendix E: Best Management Practices and Mitigation Measures."

**Comment Topic:** A commenter suggested that the text regarding helicopter flights should be revised to also allow State of Alaska fish and wildlife research, management, and rehabilitation activities.

**NPS Response:** The "Wilderness Character" section of "Appendix E: Best Management Practices and Mitigation Measures" has been updated to note that helicopter trips to achieve park objectives may include activities by the State of Alaska, partner agencies, research institutions, and others.

**Comment Topic:** A commenter suggested that the National Park Service inform the State of Alaska's area biologists regarding actions taken to reduce wildlife-visitor conflicts and monitoring results for fish populations.

**NPS Response:** The National Park Service is committed to fostering a cooperative relationship with the State of Alaska to manage fish and wildlife populations,

including data sharing, research, incident management, protective measures or emergency closure protocols, as stated in the final plan, and will continue to keep state area biologists informed of park actions and research.

**Comment Topic:** A commenter suggested that the National Park Service should rewrite certain sections of the ANILCA 810 analysis as the harvest of glaucous-winged gull eggs and goat hair are subsistence activities, with suggested text changes.

**NPS Response:** The National Park Service considers the harvest of glaucous-winged gull eggs and goat hair to be cultural harvest for tribal members and disagrees that these are subsistence activities under ANILCA. The National Park Service declines to incorporate the suggested text changes.

**Comment Topic:** A commenter suggested that since no documentation exists stating that guided activities are causing ecological damage, the National Park Service has no reason to prohibit any guiding activities in any area of the park.

**NPS Response:** The extent necessary determination was developed following NPS policy and guidance. The National Park Service does not agree that all commercial activities are necessary and appropriate in all areas of wilderness.

**Comment Topic:** A commenter suggested that guided sport fishing in wilderness freshwater areas is an appropriate and necessary commercial activity in wilderness and offered rationale for this suggestion. There was also an expressed concern regarding the description of potential impacts on wilderness character qualities in the extent necessary determination, namely the natural quality and opportunities for solitude or primitive and unconfined type of recreation.

**NPS Response:** The National Park Service disagrees that new sport fishing guides in freshwater areas is necessary to achieve the purpose of wilderness. As described in the extent necessary determination, there are ample opportunities for self-guided freshwater fishing in Glacier Bay Wilderness that are attainable without commercial guide participation. However, the National Park Service acknowledges that commercial guides may provide services pre-trip or transportation to freshwater areas. The physical characteristics of freshwater streams and rivers in the park are such that they are either adequately accessed by a salt-water fishing guide (and thus a separate guiding activity is not necessary) or are proximate to frontcountry areas and thus do not require a guide service.

In response to the concern regarding potential impacts on wilderness character qualities from guided services, the extent necessary determination has been updated to remove specific references to wilderness character impacts and to emphasize that the service will not be expanded beyond current operations for the reasons described above.

**Comment Topic:** A commenter suggested that guided day hiking should be allowed in the Frontcountry Access Zone and the Remote Wilderness Zone and suggested text changes to reflect this.



**NPS Response:** Guided day hiking is not permitted in Frontcountry Access Zone to be consistent with direction provided in the general management plan that commercial services are needed for more remote areas of the park. Hiking associated with tour vessels is covered under the extent necessary determination for tour vessels. In the Remote Wilderness Zone, guided overnight use is allowed and may occur in tandem with day hiking. Otherwise, the National Park Service will not permit guided day hiking in the Remote Wilderness Zone to manage for the preservation of wilderness character.

**Comment Topic:** A commenter suggested that the discussion of park purposes in the extent necessary determination should acknowledge the full extent of ANILCA Section 101, including subsections (c) and (d), and additional rights to use resources within the park.

**NPS Response:** The ANILCA provisions that are cited generally do not pertain to commercial activities and therefore are not necessary as background information in the extent necessary determination. The National Park Service has the authority to allow or not allow commercial uses based on concessions law and is not obligated to extend all ANILCA’s public use provisions to commercial operators.

**Comment Topic:** A commenter requested the following in-text changes to the revised plan (strikethrough indicating a requested removal, underline requesting an addition):

Requested Text Changes	NPS Responses
Revised plan page 1: "...balanced with the park’s enabling <del>proclamation</del> objectives of science, <del>and</del> tidewater glacier access, <u>protection of fish and wildlife habitats and migration routes and a portion of the Fairweather Range including the northwest slope of Mount Fairweather. A more thorough discussion of Park purposes can be found in appendix B (environmental assessment [EA] page 56).</u> "	The National Park Service will not incorporate the text change. The purpose of this bullet is not to explain all the park’s objectives.
Revised plan page 1: "Meet all requirements of the 1964 Wilderness Act, as <del>implemented</del> <u>modified</u> by the... [ANILCA]"	The National Park Service will not incorporate this text change, as ANILCA did not amend or modify the 1964 Wilderness Act. ANILCA is a separate law that created special provisions for areas of wilderness designated by it.
Revised plan page 6: The addition of a text box containing information about wilderness management in Alaska.	The National Park Service will not incorporate the text change. Existing guidance directs the National Park Service to incorporate information by reference when it is reasonably available material. In the "Legislative Context" section of part 1, the National Park Service has provided a link to its official web page that provides more information about ANILCA and wilderness in Alaska.
Revised plan page 10, bullet 3: "Reevaluates the general management plan benign neglect management strategy for historic structures <del>with a direct association to Tlingit Homeland values</del> in light of updates to cultural resource management guidance and practices that encourage their consideration as ethnographic resources."	The National Park Service will not incorporate the text change. The reevaluation is specific to historic structures with a direct association to Tlingit Homeland values.
Revised plan page 11, Planning History and Context: "Together, these plans are components of the park’s planning portfolio and help the park to meet the general	The National Park Service will not incorporate the text change. The requirement in ANILCA Section 1301 applied to the original management plans that were

Requested Text Changes	NPS Responses
management plan statutory requirements of 54 USC 100502 <u>and 16 USC 3191.</u> "	completed in the 1980s. Those requirements do not apply to current plans.
Appendix B, page 58, second paragraph, bullet 1: "Is the activity consistent with laws, policies, and regulations (including ANILCA and Alaska specific policies and regulations)?"	The National Park Service will not incorporate the text change, as the laws, policies, and regulations referred to are inclusive.
Appendix B, page 60: "This activity is inclusive of recreational activities, such as <u>snowmachines (section 1110 of ANILCA) and human-powered snow sports including by board (e.g., skiing, snowboarding), snowshoeing and hiking on snow, and considering potential other emerging recreational uses as they arise.</u> "	The National Park Service will not incorporate the text change. The special access provision in ANILCA allows for snowmachine use for traditional activities. Snowmachines have no history of being used in Glacier Bay National Park and therefore will not be considered for commercial use.
Appendix E, page 90: We request the following modification regarding permanent or temporary structures and installations: " <u>ANILCA modified the Wilderness Act to allow <del>prohibits</del> permanent or temporary structures and installations in certain circumstances, subject to reasonable regulation (see sections 1310, 1315 and 1316). of any kind to retain its primeval character and influence.</u> "	The National Park Service will not incorporate this text change, as ANILCA did not amend or modify the 1964 Wilderness Act, but will amend the text in appendix E for clarification as follows: "The Wilderness Act prohibits permanent or temporary structures and installations of any kind <del>to retain its primeval character and influence, unless certain conditions are met.</del> <u>ANILCA allows additional special provisions regarding cabins and installations.</u> "

## ATTACHMENT B: ERRATA INDICATING TEXT CHANGES TO THE ENVIRONMENTAL ASSESSMENT

### INTRODUCTION

This errata documents changes (corrections and minor revisions) to the text of the environmental assessment as a result of comments received on the environmental assessment during the public review process, as well as other corrections.

Page numbers referenced pertain to “Part II – Environmental Assessment” of the revised plan and environmental assessment released to the public for review on February 15, 2023. Original text from the environmental assessment is included to provide context and to allow for comparison to the text change. Additions to text are underlined, and deleted text is shown by ~~strikeout~~.

### ERRATA FOR ENVIRONMENTAL ASSESSMENT

#### Page 1.

The revised Backcountry and Wilderness Management Plan (revised plan), once finalized, will set the framework for the National Park Service (NPS) to manage the 2.67 million acres of designated Wilderness lands and waters within Glacier Bay National Park (the park).

#### Page 1.

The need for the environmental assessment is to provide broad guidance, primarily for 2.67 million acres of terrestrial wilderness areas and a small number of wilderness waters areas, and to establish a framework for responding to current and future changes in visitor use in park wilderness.

#### Page 2.

The project area for the revised plan and environmental assessment includes approximately 2.67 million acres of designated Wilderness.

#### Page 3.

Type of Action	Specific Action	NEPA Compliance
Alternative B: Proposed Programmatic Actions	Broad backcountry and designated Wilderness management framework, including zoning	Compliance covered in this NEPA review
	Communication upgrades	Compliance covered in this NEPA review except further cultural resource and wetland site-specific compliance that will be required and will be completed as appropriate. Further cultural resource and wetland site-specific compliance will be required and will be completed as appropriate. Subject to a future minimum requirements analysis.
	Trail development	Compliance covered in this NEPA review assumes that the final design for the trail falls within the assumptions for this analysis except for further

Type of Action	Specific Action	NEPA Compliance
		cultural resource and wetland site-specific compliance that will be required and will be completed as appropriate. If the final design for this trail falls outside the assumptions for this analysis, additional analysis, compliance, and permitting would be completed before construction. Further cultural resource, natural resource, and wetland site-specific compliance and permitting will be required and will be completed once final design for the trail is completed. Subject to a future minimum requirements analysis.
Alternative B: Site-Specific Actions	Required backcountry camping permits year-round	Compliance covered in this NEPA review
	Group size year-round and including day use	Compliance covered in this NEPA review
	Permitting commercial mountaineering	Compliance covered in this NEPA review

**Page 8.**

Alternative B proposes deploying a maximum of one park very high frequency (VHF) radio repeater site and a maximum of eight automatic identification system (AIS) transponder sites new communications infrastructure within the next one to three years at new locations in designated Wilderness ~~if co-location with existing infrastructure is not feasible (as described and analyzed in the marine management plan)~~. Per the marine management plan, AIS transponder sites will first be co-located with existing VHF infrastructure; only when co-location with existing infrastructure will not work will a completely new AIS transponder site be developed. Installation of new communications infrastructure would require future compliance as described in table 1. The communications infrastructure would support the ~~automatic identification system (AIS), an automatic vessel tracking system that uses transceivers on vessels and land-based receiver stations that transmit a vessel’s position so that other vessels are aware of its position,~~ with the goal of using the minimal number of necessary installations to achieve complete coverage of park waters. ~~Automatic identification system information supplements marine radar, which is the primary method of collision avoidance for marine vessels.~~ The AIS infrastructure would also enhance safety and search and rescue capabilities in the park. Currently, only one AIS transponder site is in the park at a US Coast Guard installation that historically has provided aids to navigation on a headland at Cape Spencer.

**Page 10.**

For safety reasons, ~~the area encompassing segments of the new trail that are under active construction~~ will be temporarily closed to the public as needed. ~~during construction and improvement~~ The temporary closures of segments of the trail for construction purposes is expected to occur over the course of two or three summers. Details on area closure times and durations will be posted for the public at the trailhead and other town locations and on the park website and social media outlets.

**Page 10.**

Under alternative B, the group size for the park's wilderness would remain at 12 or fewer people ~~but~~ and would apply to both overnight and day visitors. Group size would also apply year-round instead of only between March 1 and October 31.

**Page 11.**

Alternative B proposes allowing commercially guided mountaineering and associated activities in the Fairweather Range. This change would officially ~~codify~~ allow a commercial recreational use that has been occurring on a temporary basis and allow the park to continue to regulate use to protect resources. The provision of this use aligns with objectives of the ~~1984 General Management Plan~~ general management plan to encourage commercial services for the least-accessible areas of the park. An allocation of six commercial groups per year in the Fairweather Range has been ~~identified~~ determined to be the appropriate maximum number needed to ensure wilderness character is maintained and resources are preserved. For all commercial mountaineering in the park, ~~including in and~~ outside the Fairweather Range, simultaneous trips within the same area would be prohibited. For more information on the determination concerning commercial mountaineering and applicable regulations, please see the extent necessary determination (appendix B of the final plan).

**Page 14.**

Limiting group size numbers affects some visitors' ability to experience the wilderness in larger groups; however, most visitors travel in groups of less than five (~~NPS 2021a~~ Furr et al. 2021), and group size limits enhance visitor opportunities to experience wilderness with limited crowding and congestion.

**Page 17.**

Because a permit is currently voluntary for this subset of visitors, it is difficult to quantify how many people ~~Alternative~~ alternative B would affect.

**Page 18.**

This could have a slight adverse effect on a small portion of day visitors, though 76% of visitors travel in groups of five or fewer (~~NPS 2021a~~ Furr et al. 2021).

**Page 23.**

Alternative B calls for two actions that would involve vegetation clearing and ground disturbance: constructing a new trail and installation of one very high frequency (VHF) radio and up to ~~eight~~ 10 automatic information system (AIS) stations.

**Page 24.**

Installation of one VHF radio and up to ~~eight~~ 10 AIS stations would each require site clearing and disturbance of up to 100 square feet and potentially additional site clearing for helicopters landings depending on the location. Some sites being considered are devoid of vegetation. These locations would range from sea level to high altitude locations. Direct impacts on vegetation would result from foot traffic, anchoring of equipment, and

maintaining clearances over time. Vegetation impacts would be highly localized, limited to the area immediately surrounding the station. To minimize the possibility of introducing invasive plants, mud and dirt and plant material would be removed from project equipment, footwear, and clothing prior to travelling to any station sites. Stations would be monitored for the presence of invasive species during annual maintenance visits. The potential installation of one VHF radio and up to eight ~~10~~ AIS stations is unlikely to have any impacts on vegetation outside of the immediate 100-square-foot area of each of the sites, up to ~~1,100~~ 900 square feet total.

**Page 25.**

Installation of one VHF radio and up to eight ~~10~~ AIS stations is unlikely to have any impacts on vegetation outside of the immediate 100-square-foot area of each of the sites, up to ~~1,100~~ 900 square feet total.

**Page 29.**

The park has one of the largest wilderness areas in the country, containing 2.67 million acres of marine and terrestrial designated Wilderness environments

**Page 33.**

The installation and maintenance of one VHF radio and up to eight ~~10~~ AIS stations at new sites in designated Wilderness would have adverse impacts on opportunities for solitude due to the presence of human installations and the use of helicopters to deliver materials, as up to 10 helicopter landings per site may be required for installation and up to two annual landings for maintenance purposes per site.

**Page 34.**

Under alternative B, the installation of one VHF radio and up to eight ~~10~~ AIS stations and development of approximately 10 miles of trail from the Falls Creek area to Excursion Ridge would decrease opportunities for solitude or primitive and unconfined recreation in the vicinity of the trail and new communications infrastructure, and requiring backcountry camping permits year-round would decrease opportunities for primitive recreation. Still, wilderness users could disperse in across the other 2.67 million acres of wilderness and would still have the freedom to choose their own campsites and allow their trip to unfold as weather, whim, and tides dictate.

**Page 35.**

The construction of new trail in the 5,000 acres of wilderness where the Excursion Ridge trail is proposed would represent a noticeable change to the undeveloped quality of that area; however, the scale of this change to the undeveloped quality of wilderness is small compared to the context of the 2.67 million-acre Glacier Bay Wilderness.

**Page 35-36.**

Proposed communication upgrades include the installation and maintenance of one VHF radio repeater and up to eight ~~10~~ AIS stations at new sites in designated Wilderness for AIS

receiver 36 stations and VHF radio infrastructure, which would have adverse impacts on wilderness.

**Page 36.**

The ~~11~~ nine installations proposed under alternative B would directly impact a small fraction of the greater Glacier Bay Wilderness.

**Page 36.**

Alternative B would cause a permanent adverse impact on the undeveloped quality through the construction of a new trail and installation of one VHF radio and up to eight ~~10~~ AIS stations, as well as temporary adverse impacts by using helicopters for material delivery and other motorized equipment for trail construction.

**Page 36.**

The incremental impacts of the action alternative would contribute to, but not substantially change, the impacts that are already occurring to the undeveloped quality in the 2.67 million-acre Glacier Bay Wilderness.

**Page 37.**

Under alternative B, the construction of approximately 10 miles of trail from the Falls Creek area to Excursion Ridge and the installation of one VHF radio and up to eight ~~10~~ AIS stations would represent a new development in wilderness.

**Page 38.**

The continuation and potential increase in of recreational human presence in the Fairweather Range would have adverse impacts on the feeling and association of the sacredness of the range to the Tlingit. Tlingit do not access the mountain or the range except during shamanic initiations, the last of which occurred in the 1930s (although the mountain is visited spiritually during ceremony held elsewhere). By defining and increasing the maximum number of permitted commercial mountaineering trips annually instead of reviewing on a case-by-case basis, there would be a corollary ~~cumulative~~ increase of adverse impacts on the ethnographic resources within the Fairweather Range. Recreational human presence would likely be limited to a short duration of the year, as Mount Fairweather is typically climbed during a narrow one- to two-month window in April and May. ~~In addition to commercial mountaineering having adverse impacts on the ethnographic connection between the Fairweather Range and the Tlingit people, there is potential for additional impacts on the ethnographic resource by introducing more visitors to the range who may not be aware of the ethnographic importance of the range. While their presence itself may be considered profane, mountaineers may engage in other actions that could be considered disrespectful.~~ In addition, mountaineers may engage in other actions that could be considered disrespectful. However, the National Park Service would provide an education and orientation of the sacredness of Mount Fairweather to mountaineers and would ensure commercial guides are adequately trained on the importance of this resource. Though the alternative would result in long-term adverse impacts on ethnographic resources in the Fairweather Range, the National

Park Service would manage commercial mountaineering with the defined restrictions and limitations placed upon it (see the extent necessary determination in appendix B in the final plan for more details; examples include no more than six trips per year, all trips will be prohibited from entering Karst or other cave features unless a special permit is granted by the National Park Service) as part of this environmental assessment and implement best management practices and mitigation measures to reduce adverse impacts.

Page 42.

## **ALASKA DEPARTMENT OF FISH AND GAME**

The joint master memorandum of understanding with the State of Alaska recognizes that the National Park Service has a responsibility to conserve fish and wildlife resources, and the State of Alaska has the management authority to protect healthy, unimpaired populations to provide for the sustained yield of fish and wildlife populations across all Alaskan lands for the benefit of all Alaskans (ADFG and USFWS 1982). The State of Alaska has the primary responsibility to manage fish and resident wildlife within the state. If park staff or outside agencies notice a change in fish and wildlife populations, which may be the result of human pressures that can be managed at the park level (e.g., overfishing in certain areas of the park, fishing gear impact concerns, reported wildlife incidents), park staff will consult with its cooperative partnerships, including the State of Alaska, on this issue to determine needed corrective actions through a science-informed and regulatory decision-making approach to take corrective action. Park actions will generally follow the management action progressions listed below using transparent processes (public press releases, proposals to the State of Alaska, park compendium, Code of Federal Regulations, and public comment opportunities). The National Park Service is also committed to fostering cooperative relationships to manage fish and wildlife populations, including data sharing, research, incident management, protective measures or emergency closure protocols (such as through the State of Alaska Board of Fisheries process to change sport fishing regulations), memorandum of understanding, and a joint fisheries management plan. The memorandum of understanding with the State of Alaska, signed in 1982, recognizes that the state and the National Park Service share a mutual concern for fish and wildlife resources and their habitats and a desire to develop a cooperative relationship (ADFG and USFWS 1982).

Page 105.

The National Park Service is charged with managing approximately 2.67 million acres of designated Wilderness lands and waters within Glacier Bay National Park.



## ATTACHMENT C: DETERMINATION OF NON-IMPAIRMENT

The NPS Organic Act of 1916 directs the National Park Service to “conserve the scenery, natural, and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). National Park Service *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

*While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.*

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, section 1.4.5). To determine impairment, the National Park Service must evaluate the “particular resources and values that will 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 constitute impairment, but an impact would be more likely to constitute an 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;
- 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” (NPS 2006, section 1.4.5).

Resources that were carried forward for detailed analysis in the environmental assessment, and for which a non-impairment determination has been made, include vegetation, wetlands, and Fairweather Range Ethnographic Resources/Traditional Cultural Properties/Cultural Landscape. A non-impairment determination is not necessary for visitor use and experience, solitude or primitive and unconfined recreation quality of wilderness character, or undeveloped quality of wilderness character because these impact topics are not generally considered a park resource or value subject to the non-impairment standard (see NPS 2006, section 1.4.6).

## **VEGETATION**

Vegetation is a component of the fundamental resources and values of Glacier Bay National Park. In the selected alternative, up to 6.1 acres of vegetation will be removed due to of the proposed trail development, and an additional 900 square feet will be removed due to communication upgrades. This removal will result in an incremental addition to the existing development footprint within these vegetation habitats and therefore is not expected to impact native plant species at a population level, given the localized disturbance of the action and the prevalence of the plant species in the project area. Mitigation measures and best management practices will further minimize the impacts on the vegetation communities within the park. Overall, given the limited vegetation clearing and spatially localized nature of these actions, the selected alternative will not result in impairment to this resource.

## **WETLANDS**

Wetlands are a component of the fundamental resources and values of Glacier Bay National Park. The proposed development of the approximately 10-mile Excursion Ridge trail from the Falls Creek area to Excursion Ridge will result in the placement of boardwalks, support posts, and/or fill and vegetation clearing in some wetland locations, with a subsequent increase in the potential for establishment and expansion of invasive plants and shading out of native vegetation material. Mitigation measures, such as maintaining appropriate erosion and siltation controls during construction, removing temporary stockpiles as soon as possible, and properly maintaining structures and fill, will minimize both direct and indirect impacts on wetlands. These practices, when combined with the small area of ground disturbance in relation to the total acres of wetlands present in the project area (approximately 22,000 acres), will not significantly alter habitat availability and/or overall wetland function within the park setting. Therefore, the selected alternative will not result in impairment to the park's wetlands.

## **FAIRWEATHER RANGE ETHNOGRAPHIC RESOURCES/TRADITIONAL CULTURAL PROPERTIES/CULTURAL LANDSCAPE**

Ethnographic resources, cultural landscapes, and sacred sites are considered fundamental resources and values of this national park unit. Under the selected alternative, up to six commercial mountaineering trips will be permitted in the Fairweather Range each year. The continuation and potential increase of recreational human presence in the Fairweather Range will have adverse impacts on the feeling and association of the sacredness of the range to the Tlingit. Tlingit do not access the mountain or the range except during shamanic initiations, the last of which occurred in the 1930s (although the mountain is visited spiritually during ceremony held elsewhere). By defining and increasing the maximum number of permitted commercial mountaineering trips annually instead of reviewing on a case-by-case basis, there will be a corollary increase of adverse impacts on the ethnographic resources within the Fairweather Range. Recreational human presence will likely be limited to a short duration of the year, as Mount Fairweather is typically climbed during a narrow one- to two-month window in April and May. In addition, mountaineers may engage in other actions that could be considered disrespectful. However, the National Park Service will

provide an education and orientation of the sacredness of Mount Fairweather to mountaineers and will ensure that commercial guides are adequately trained on the importance of this resource. Though the selected alternative will result in long-term adverse impacts on ethnographic resources in the Fairweather Range, the impacts will not be significant because the National Park Service will manage commercial mountaineering with the defined restrictions and limitations placed upon it (see the extent necessary determination in appendix B in the final plan for more details; examples include no more than six trips per year, and all trips will be prohibited from entering Karst or other cave features unless a special permit is granted by the National Park Service) as part of this environmental assessment and implement best management practices and mitigation measures to reduce adverse impacts. Therefore, the selected alternative will not result in impairment of this park resource.

## **SUMMARY**

The National Park Service has determined that the implementation of the selected alternative will not constitute impairment of the resources of the park. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the environmental assessment, comments provided by the public and others, and the professional judgement of the decision maker guided by the direction in *NPS Management Policies 2006*.

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