

National Park Service
U.S. Department of the Interior

Denali National Park and Preserve
Alaska



Finding of No Significant Impact

**For Improving Visitor Access to the Sled Dog Kennels and Demonstrations at
Denali National Park**

February 2010

Recommended: Paul R. Anderson 2/12/10
Superintendent, Denali National Park and Preserve Date

Approved: Ann G. Masiis 3/11/2010
Regional Director, Alaska Date

FINDING OF NO SIGNIFICANT IMPACT

For Improving Visitor Access to the Sled Dog Kennels and Demonstrations at Denali National Park

**Denali National Park and Preserve, Alaska
February 2010**

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate alternatives for improving visitor access to the sled dog kennels and demonstrations in the headquarters area of Denali National Park and Preserve.

The NPS has selected Alternative 3, the preferred alternative, Construction of New Access Road, with the mitigation measures. Under this alternative, the NPS would construct a new access road that would create a loop into and out of a new bus parking lot near the park sled dog kennels. Visitor and employee parking lots would be constructed alongside the access road. The new access road would allow the Headquarters Historic District to be closed to most through traffic and would provide a new area for administrative vehicle parking, and the new bus parking lot would improve safety for the bus passengers when they board and disembark their buses. Mitigation measures have been integrated into the proposal.

Responses to public comments are found in Appendix A.

ALTERNATIVES

Three alternatives were evaluated in the EA.

Alternative 1, No Action

Under Alternative 1 the Service Road from the Park Road to headquarters would remain and serve as the primary access for shuttle buses to the kennels. Visitors to the kennels would continue to be let off along this service road, and shuttle buses would pull through the headquarters area to return to the Park Road. No additional parking would be constructed for visitors accessing the kennels with their private vehicles and outlet posts would not be added to the current parking for winter users. No cover would be constructed over the stands for the sled dog demonstrations.

Alternative 2, Realign the Existing Service Road

Under Alternative 2 a new parking area measuring approximately 22,500 sq ft and sufficient for 28 parking spaces, would be constructed west of the visitor 'flagpole' parking lot, including electric plug-ins for all of the spaces. Access to the new parking area would be from the 'flagpole' parking lot via an approximately 60 ft driveway (included in the 22,500 sq ft). The final design for this parking lot would retain a vegetative screen between the parking area and the park road.

A new parking loop for up to six kennels shuttle buses would be installed south of the existing parking location, connecting with the existing service road. The service road entry at the juncture with the main park road would be moved approximately 150 feet west of the current access junction with a level pad at the junction for buses to stop while waiting to turn to the Park Road. This action would allow sled dog demonstration buses to avoid driving through the core headquarters area. The grade on this alignment of the service road would not exceed 11%. The upper section of the existing service road would be revegetated. Electric plug-ins would be added for each existing parking space in the flagpole parking lot.

Alternative 3, Construction of a New Access Road (Preferred Alternative)

Under alternative 3 a new parking area, measuring approximately 12,400 sq ft and sufficient for 11 parking spaces, would be constructed west of the visitor flagpole parking lot, including electric plug-ins for all of the spaces. Access to the new parking area would be from the flagpole visitor parking lot. The final design for this parking lot would retain a vegetative screen between the parking area and the park road.

A new parking loop for the sled dog demonstration shuttle buses would be installed over and south of the existing parking location that supports parking for six buses. This parking loop and the new parking area adjacent to the flagpole parking area would be connected by a two-way road. The road would have a maximum grade of 6%. An additional 17 visitor parking spaces with plug-ins would be placed along the road. Most of the existing service road would be removed and revegetated, with small sections included in the project area.

New road and parking areas would be filled with non-frost susceptible materials to grade and would be overlaid with asphalt pavement and include culverts to improve drainage of the area.

A new system to divert upslope water away from existing headquarters facilities would be created, directing collected water into a new drainage ditch that would be constructed and revegetated using tundra mat that is already in place from the western edge of the bus turnaround parking lot to west of the kennels, following a natural contour line through the area.

A new pedestrian trail would be constructed to connect the parking along the new access road with the existing pedestrian trail to the kennels. A short pedestrian trail would be constructed to connect the new bus parking loop with the existing paved access road to the kennels.

Electric plug-ins would be added for each existing parking space in the visitor parking lots, and exterior lights would be added in several locations in the district to illuminate pedestrian trails and parking areas.

Roof structures would be constructed over the existing stands for viewing the sled dog demonstrations.

PUBLIC INVOLVEMENT

The EA was issued for public review and comment from December 22, 2009 to January 22, 2010. The EA, or notices of the EA's availability, were sent by mail or email to over 200 government agencies, interest groups, and individuals. The EA was posted on the national NPS web page for public review NEPA documents – Planning, Environment, and Public Comment (PEPC) – and on the park's webpage. The park issued a press release about the availability of the EA and the open comment period on December 22, 2009. Five written comments and one telephoned comment were received. Three comments suggested a different alternative, one comment was in favor of the preferred alternative, one comment requested more attention to winter safety and energy efficiency, and one comment suggested a clarification.

The public comments received did not change the conclusions in the EA about the environmental effects of the action. The NPS responses to substantive public comments are found in the Appendix A.

DECISION

The NPS decision is to select Alternative 3, Construction of a New Access Road, along with the mitigating measures.

Mitigating Measures

The following mitigation measures apply to the selected Alternative 3, Construction of a New Access Road:

Vegetation, Soils and Groundwater: Disturbed sites within the project area will be replanted with native vegetation, following the Interior Alaska Revegetation Plan (United States Geological Survey 1994). Revegetation and landscaping will employ native plant species only. Measures to prevent invasive plant colonization will include: pressure washing construction equipment and vehicles prior to entering the park, any gravel or fill required will either come from a weed-free materials site (as verified by a park vegetation technician) or will be heated to kill any plant material or seeds, and continuation of the park's existing exotic plant eradication program.

Wetlands: Silt fences and other Best Management Practices (BMP) technologies will be used to protect any adjacent wetlands. As described in the Wetlands Statement of Findings, mitigation by rehabilitating wetlands in another area of the park would be accomplished.

Wildlife and Habitat: Under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703), it is illegal to "take" migratory birds, their eggs, feathers or nests. "Take" includes by any means or in any manner, any attempt at hunting, pursuing, wounding, killing, possessing or transporting any migratory bird, nest, egg, or part thereof. The MBTA does not distinguish between intentional and unintentional take. Vegetation clearing, site preparation, or other construction activities that may result in the destruction of active bird nests or nestlings would violate MBTA. In order to

avoid violations of the MBTA, bird habitat (vegetation) would not be removed during the nesting season, April 1 through August 1. After completing all the nesting vegetation removal required for the project, there would be no seasonal restriction for construction activities, even during the following nesting seasons. If any active nest of any bird species, including resident species, were encountered at any time, it would be protected from destruction. “Active” is indicated by intact eggs, live chicks, or presence of an adult on the nest. Eggs, chicks, or adults of wild birds would not be destroyed.

Cultural Resources: New construction would use materials and design elements that are compatible with the character of the buildings in the historic district. Landscape features would follow the recommendations of the *Cultural Landscape Report for Park Headquarters* (NPS 2008). The project has been reviewed by the State Historic Preservation Officer and she has determined that No Historic Properties will be Adversely Affected. Project excavations would be monitored by cultural resource staff. If newly discovered cultural resources are identified during project implementation, work in that area must stop and the Superintendent notified immediately.

Night Sky/Natural Lightscape: Selection of outdoor lighting fixtures and technology would involve the expertise of the NPS Night Sky Team or other qualified engineers to assist in minimizing the impact of new outdoor lights on night sky visibility. Principles that would guide new lighting include: 1) shielding light fixtures so that all the light produced by the fixture shines below the horizontal or, alternatively, using very low illumination lighting only, 2) using lower illumination levels (particularly important on light colored ground or snow, as a significant amount of light would reflect upward), 3) using narrow spectrum and/or longer wavelength lamps unless full spectrum lamps are necessary or warranted, and 4) dividing areas into several circuits to allow for phased operation and future smart technology implementation such as dual lighting levels, motion sensors, or timers.

Park Operations and Management: Post-construction, the dog kennels would be the primarily affected park operation. The proximity of the new bus parking loop may cause disturbance of the dogs both during the summer at the dog demonstrations and during the winter with mushers, which introduces the possibility of outside dogs interacting with the park dogs, and other winter visitors using the bus parking lot. Final design on the preferred alternative will include as much distance between the kennels and the bus parking loop as is feasible. Depending on the final design in terms of its proximity to the kennels, mitigation measures for this disturbance would include both visual and sound barriers between the south end of the bus loop and the kennels.

Rationale for the Decision

The selected action (Alternative 3, Construction of a New Access Road) will satisfy the purpose and need of the project better than other alternatives because the proposed realignment will provide improved sled dog demonstration shuttle bus parking and turn around capabilities. The circular or looped access road would redirect traffic, providing safer parking and eliminating pedestrian conflicts in the Headquarters Historic District. Additional year-round parking would provide improved visitor access. The reduced grades (6%) will significantly improve the driving safety for visitors access the kennels area in the winter. Roof structures over the demonstration stands would provide shelter from rain and shade from the sun.

Alternative 1 (No Action, Environmentally Preferred) would not accomplish the purpose and need of the project because administrative vehicles need to be removed from the core of the Headquarters Historic District before the area can be re-landscaped as approved in the treatment section of the District Cultural Landscape Report. This alternative also would not improve the safety shortcomings at the existing kennels bus parking lot and the steep grades on the access road would preclude its use in the winter.

Alternative 2 (Realign the Existing Service Road) would not accomplish the purpose and need of the project because the steep road grade proposed for access to the kennels does not provide improved vehicle safety. The estimated 11% grade would not only create unsafe driving conditions during rainy and icy weather, but would retain three separate access points to the Park Road increasing opportunities for vehicle conflicts for merging buses. Visitor opportunities would not be improved since the access road would not support winter recreation

Significance Criteria

The preferred alternative (Alternative 3) will not have a significant effect on the human environment. This conclusion is based on the following examination the significance criteria defined in 40 CFR Section 1508.27.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

The EA evaluated the effects of Alternative 3 as minor adverse on air quality, wildlife and wildlife habitat, cultural resources, night sky/natural lightscape and moderate adverse on vegetation, soils and wetlands. Evaluations also included minor benefits to local communities and local economy and to park management and operations, and with moderate beneficial impacts to visitor use and recreation. There will be no significant restriction of subsistence uses.

(2) The degree to which the proposed action affects public health or safety.

There would be a minor improvement to visitor safety by providing a bus loading and unloading area that conforms to standards for accessibility. Area lighting would also be improved, especially for months such as September when the days are shorter than in summer, yet there is minimal to no reflective snow on the ground.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.

The construction of a new access road and bus parking lot would be located in a national park, generally on top of wetlands, and adjacent to and partially in the Headquarters Historic District. The EA evaluated the effects of the project and concluded that there would be a moderate impact of wetlands and a minor impact on cultural resources. Standard two-for-one compensation for the

wetlands loss would be undertaken within a placer-mined stream floodplain in the Kantishna Hills. The project has been reviewed by the State Historic Preservation Officer and she has determined that no historic properties would be adversely affected

(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

The effects on the quality of the human environment would not be controversial. The NPS sent the EA to over 200 agencies, organizations, and individuals for public review. Only 6 comment letters were received. The environmental analysis concluded that the proposed access road and bus parking lot would have from negligible to moderate impacts on park resources. The commenters did not question these findings.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The environmental effects of the selected alternative (Alternative 3) do not involve unique or unknown risks.

(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.

The project is a revision of the first part of a suite of projects and plans approved in the 2007 Headquarters Area Plan aimed at improving circulation, parking, utilities and infrastructure conditions in the Headquarters Historic District. Alternative 3 will not block or restrict other actions approved in that Plan.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

The actions in Alternative 3 are revisions for the first part of a suite of projects and plans approved in the 2007 Headquarters Area Plan aimed at improving circulation, parking, utilities and infrastructure conditions in the Headquarters Historic District. The impacts to park resources from that Plan were evaluated as not significant. The actions in Alternative 3, and the rest of the actions approved in the 2007 Headquarters Area Plan, are part of a package of facility improvements evaluated as having a major beneficial impact on visitor use and recreation by the 1997 Entrance Area and Road Corridor Development Concept Plan/Environmental Impact Statement.

(8) Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The selected alternative has been reviewed by the State Historic Preservation Officer and she has determined that no historic properties would be adversely affected.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

The selected alternative would not adversely affect an endangered or threatened species or its habitat.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The selected alternative (Alternative 3) would not violate any Federal, State, or local law.

FINDINGS

The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park.

The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990. There will be no restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

The National Park Service has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.

ATTACHMENT A

NPS RESPONSES TO PUBLIC COMMENTS AND ERRATA for the Denali National Park and Preserve Environmental Assessment For Improving Visitor Access to the Sled Dog Kennels and Demonstrations at Denali National Park

In response to the environmental assessment, the NPS received six comments. Described below are the substantive comments and the NPS responses.

1. Comment #1. Environmental Group [Denali Citizens Council (DCC)]: This EA errs in describing the No Action Alternative as the existing condition. There is actually a mandated infrastructure project for the kennels road that was decided in the Headquarters Master Plan in 2007.

NPS Response #1: NPS guidance on procedures for implementing the National Environmental Policy Act says that the No Action Alternative should represent a continuation of existing conditions and activities without a particular planning context.

2. Comment #2. DCC: This EA fails to give adequate “Purpose and Need” for overturning decisions made in the Headquarters Master Plan. The only reason given for changing the Kennels parking preferred alternative in the 2007 HQ Plan EA to the one in this EA is listed on page 1 by the sentence, “*Additional internal scoping regarding the realignment of the kennel access road and needs for associated parking prior to construction resulted in a new proposed action....*” (EA, p. 1) No analysis other than “internal scoping” is offered to explicate this big change in a prior plan. Is there a problem with enough parking for tourists, or is it in fact a problem for employee parking?

NPS Response #2: The 2007 HQ Area Plan EA addressed numerous issues, some more conceptually than others. During a Value Analysis workshop on the Kennels Access Road it was determined that the 11% grade that would be the result of the realignment of the Kennels Service Road, as included in the HQ Area Plan preferred alternative, would be at the outer limit of acceptability for uphill bus use, especially on those days with slippery conditions, which would preclude winter use by buses. This internal scoping in 2008 led to the development of a new preferred alternative and this new round of consultation with the public of which this EA is the culmination.

3. Comment #3. DCC: The project described in Alternative 3 is too big and causes the greatest new impacts of all the available alternatives, an unacceptable situation, especially given the unproved assertion of need. The 2007 HQ EA sold the idea of a parking loop for kennels buses by claiming that it would be a fairly small intrusion: “The loop would be approximately 200 feet long by 24 feet wide with a one-way service road that supports parking for 6 buses.” The Kennels Service Road would be made less steep by connecting with the Park Road about 150

feet west of the present intersection and would support two-way traffic.

The present EA says that the 2007 proposal was untrue, that the Service Road approved in 2007 would be too steep for vehicles to climb safely, not only in winter on snow but in summer. It also says that the 0.1 acre bus parking lot approved in 2007 would have to be expanded to about 1.4 acres to serve the same functions planned for in 2007. The 0.7 acres of disturbance to wetlands proposed in 2007 for the new parking lots plus the realignment of the Service Road now can't be accomplished without 2.5 acres of disturbance to wetlands.

NPS Response #3: Alternative 3 combines summer and winter public and administrative parking and bus parking with an all-weather road in as compact a design as we can make it. The impacts to vegetation and wildlife habitat are given in acreage ranges and we are striving with the designers to get the final footprint as small as possible, while addressing vehicular and pedestrian safety standards.

4. Comment #4. DCC and one Individual: The expanded footprint for bus parking and the new road and visitor parking in Alternative 3 would have a tremendous impact on the experience within the Historic District itself, surrounding one side with pavement. The EA does correctly state that there are only minor benefits from the proposed action. Yet the preferred alternative creates large impacts and spends excessive amounts of money to achieve these minor gains.

NPS Response #4: The HQ Area Plan has as a fundamental direction to remove vehicles and a significant amount of through traffic from the core of the HQ Historic District. This project is required in order to improve pedestrian safety and provide a quieter setting for visitors to enjoy the Historic District.

5. Comment #5. DCC and two Individuals: The EA incorrectly asserts that bus traffic must necessarily be eliminated from traversing the headquarters area because of decisions in the Headquarters Area Plan and Environmental Assessment and recommendations of the Cultural Landscape Report for Park Headquarters. However, the recommendations and decisions in those documents were made based on assumptions that bus traffic could be removed from the area without the need for the construction of additional access roads or the additional impacts that such new construction would create to the historic district. The recommendations to remove bus traffic were made because the means to remove the traffic was viewed as being reasonable. These recommendations and decisions were dependent upon the belief that the grade of the existing access road was not a problem for summer bus use and there was no need for winter access.

The NPS has subsequently introduced new criteria in this assessment such as grade and winter access that now negate these earlier assumptions of minimal impact to remove bus traffic, and make the those recommendations and decision moot. Yet the only alternative suggested now is to construct a completely new access road and associated parking of a size and nature that will have a different impact on the headquarters area than the assumed impacts of these earlier planning documents.

There is no need for the construction of an additional access road in a visible location that conflicts with the context of the nearby historic district. An Alternative DCC and the Individuals could support would contain elements of Alternative 2 and also the following elements and support:

a) The vast majority of traffic and vehicle impact would still be removed from the historic district if employee parking was relocated to a new parking area west of the flagpole as shown in Alternative 2.

b) The size of the bus parking area could be significantly reduced from even the footprint shown in Alternative 2 because buses could park without a large turning area if they were allowed to continue to drive east through headquarters rather than looping back to the west. Instead of a new 1.4 acre paved parking lot for the buses that brings the buses and pavement over 200 feet closer to the Kennels, the existing Service road parking lot could be brought downhill onto the flatter ground just west of the Kennel SST so that the "unboarding" accidents of the past (because of a steep gravelly surface) would be minimized. This would pull the whole planned parking area back to the north and farther away from the kennels, reducing the impacts to that whole area and resulting in less loss of native vegetation and wetlands. It would provide improved bus parking and safer bus debarking without the major impacts of Alternative 3. It would minimize viewshed and noise disturbance along the Historic District boundary.

c) Vehicle impacts to the Historic District from 3 short periods of bus traffic traveling 300' through it are likely to be insignificant relative to the continued levels of administrative traffic that will occur as employees need to transport materials to vehicles to conduct work or access offices to deliver or get supplies. The EA incorrectly gives the impression that the only vehicles left in the Headquarters area will be emergency traffic when in reality there will be regular, daily traffic of a general administrative nature in the district as long as there are offices present.

d) Removing through traffic from the core of the HQ District was given as a fundamental NPS need by the HQ CLR and by the HQ EA and by this EA. It would be incorrect to assume and hard to justify that ALL traffic must be removed, or even should be removed from the area, since two of the buildings in the core were heavy equipment shops during the period of historic significance, where trucks, graders, and other administrative vehicles were maintained, and the district functioned as a place where vehicles came and went on a regular basis.

e) In any of the present plans a paved lane will remain through the core of the district because of the continuing administrative traffic to the Cache, the Resources Building, HQ building, proposed new 4500 sq ft. Administration building, including *"Some spaces for loading/unloading and accessible parking would be retained adjacent to the Resources building in front of B102."* This paved lane is given as 10' wide in the 2007 HQ EA, although the representation created for the HQ CLR in Figure 4.10 shows a paved lane about 20' wide. In either case it would be easy, cheaper, and less destructive to allow the Dog Demo Buses to exit along this paved lane than to allow the proposal in this EA to go forward.

f) The paved lane through HQ is going to be plowed in the winter through to the bus parking lot. The one to three per week winter mushers with dog trucks could also travel through HQ to the

existing parking spaces and take-off sled team poles. Ski visitors would continue to park at the Flagpole lot. The minor levels of even any expanded winter traffic would still not be out of character with the historic levels of use. Private traffic and the small amount of bus traffic that is likely to ever be present in the winter could easily be managed in this way.

g) The document fails to adequately evaluate the physical visual impacts of the new road construction and the associated parking along it in comparison to the minor temporal impacts of three 5 minute periods of bus traffic to the overall context of the historic district.

h) The expanded footprint for bus parking and the new road and visitor parking in Alternative 3 would have a tremendous impact on the experience within the Historic District itself, surrounding one side with pavement.

NPS Response #5: Both the HQ Area Plan EA and Cultural Landscape Report for the HQ Historic District place a heavy emphasis on removing pavement and through traffic from the core of the Historic District. Though most of the through traffic would be eliminated by removing administrative parking and traffic – as envisioned by both of the action alternatives – the kennels bus traffic presently includes up to 18 buses passing daily through the District in the summer, which causes disruption and pedestrian safety issues.

6. Comment #6. SOA: We encourage the Park to manage any necessary construction activity during the height of the 2011 summer season to minimize disruption to visitors.

NPS Response #6: As much as possible it is the intention of the NPS to have the construction contractor do the bulk of the work during the off season, both to lessen the inconvenience on visitors, as well as to take advantage of the frozen ground conditions during road building.

7. Comment #7. Individual #1: It appears that most headquarters-area employees will have to walk quite a ways, in the dark, in winter from their parking areas to their jobs. The trails marked on the map appear to be indirect and lighting inadequate to provide safe walking conditions.

NPS Response #7: Any system of satellite parking would include longer distances for employees to walk to their offices in the District. Trails from the parking lots will either be provided with sufficient lighting for the darker hours or will have the infrastructure ready if it is determined that a trail needs additional lighting.

8. Comment #8. Individual #1: The location of parking so far from work makes it likely that vehicles will be plugged in all day rather than just for a few hours. Is this energy efficient?

NPS Response #8: We intend to install "smart outlets" that vary how long the outlet is live depending on the outside temperature.

9. Comment #9. Individual #2: Will this proposal affect the decision in the 2007 HQ EA to remove pavement and parked vehicles from the core of the HQ area?

NPS Response #9: The actions in this project, especially the provision for new administrative parking, will make possible the decision in the 2007 HQ EA to remove pavement and most of the parked vehicles from the core of the HQ area.

10. Comment #10. Individual #3: The need for the project is supposed to come from the 2007 HQ EA, but nowhere in that document is there a need for additional visitor parking expressed or evaluated. The 2007 HQ EA states a need for 28 employee and govt. vehicle new parking spaces to replace the ones which will be removed from the HQ District core. This plan does not evaluate or solve that need since it purports to supply "needed" visitor parking within the 28 new sites being proposed.

NPS Response #10: The best place for year-round parking of employee vehicles is in the Flag Pole parking area. Moving employee parking to this location displaced the visitor parking, which will now be accommodated along the access road and closer to the kennels.

11. Comment #11. Individual #3: Most of the 28 space employee/visitor parking solution in the preferred alternative is to put that parking on almost the worst ground possible for that purpose, i.e. wetlands underlain by ice-rich permafrost. This solution costs more money to construct, disturbs presently undisturbed ground, and is likely to require heavy maintenance and re-building due to differential settling of the ground as the permafrost thaws. Some visitor spots could be added to the non-wetland west end of the Flagpole parking lot but instead of putting the rest of the parking on permafrost, I suggest gaining the 28 spaces by creating a parking lot using the land east of Bldg 107, connecting with the spaces now at Bldg 169. This lot would be on durable ground and is surrounded by park offices. This area is adjacent to the historic district, but is not generally visible from the core of the district. Some parking sites could also be found in the unconstructed but approved lot east of the Kennels area.

NPS Response #11: While the location of the new visitor parking does impact wet lands we do not believe that the ice rich soils will create insurmountable problems. The location east of building 107 would not meet the goal of reducing traffic from the Historic District and could introduce more administrative traffic in to the housing area, which would create new safety concerns.

12. Comment #12. Individual #3: The EA states: "*A new system to divert upslope water away from existing headquarters facilities would be created...*" This drainage system is not shown on the map of the alternative, nor are the impacts from the system – good or bad – evaluated in Chapter 4, including impacts to wetlands. The drain channel would need to be at least a couple of hundred feet long so that it doesn't send water into the kennels area. This new channel will tend to de-water the wetlands downhill of it until the end of the channel is reached.

NPS Response #12: The impacts of the drainage channel are accounted for in the total of impacted wetlands. The impacts to the wetlands are no different than those already evaluated in Chapter 4.

13. Comment #13. Individual #3: Given that the ground under the proposed road and parking area is underlain by permafrost, the preferred alternative will have to create a raised road and

parking area that will be highly visible from the Historic District, diminishing the feeling that the project is supposed to generate in the first place. The only topic in Chapter 4 that addresses the visibility of the proposal is Cultural Resources. There it says that: "The new parking areas would be screened with native vegetation." The EA does not describe nor evaluate this screening plan, which, to be effective at the base of the fill slope, would have to include some fairly tall vegetation.

NPS Response #13: A raised section of road or parking area once revegetated will have limited visual impact as the natural slope west of the road will be higher still. The trees, willow and alder below the road are taller than the proposed road structure and will provide additional screening. The road structure will have a lower profile than the Park Road, which has no visual impact on the Historic District.

14. Comment #14. Individual #3: Should the cost of this project be reported in the EA?

NPS Response #14: The approximate costs of the alternatives are given in Errata #2 below. This additional cost information does not change the impact analysis of the EA.

ERRATA

This errata section provides clarifications, modifications or additional information to the EA and to the selected alternative, Alternative 3. This modification does not significantly change the analysis of the EA and, therefore a new or revised EA is not needed and will not be produced.

1. Modification. Change the language on Impacts of Alternative 3 – NPS Preferred, Cultural Resources, page 46 as follows:

The sled dog demonstration bus parking loop on the edge of the historic district, modifications to the entrance area, effects to the viewshed, changes in the organizational grid, the overall footprint of the parking area, effects to the overall cultural landscape, addition of a roof structure over the dog sled demonstration stands, and the installation of outdoor lighting have the potential to detract from the character of the district to the extent that they did not exist during the historic period of significance and may detract from the historic structures in the district. However, the impact of these actions would be mitigated through compatible design and other recommendations from the State Historic Preservation Officer (SHPO). The new parking areas would be screened with native vegetation. The lighting fixtures would be selected to be compatible with the rustic appearance of the district. There would be a minor benefit to the historic district by re-routing bus traffic out of the district. There would also be minor benefits to the historic district with improvements to drainage that would protect the district from surface flow. . Consultation with the State Historic Preservation Officer regarding potential effects and mitigation measures has resulted in a finding of no adverse impact to the historic district or historic properties.

~~The net result of the action in this alternative may result in a long-term, adverse impact to the character of the historic district. Further SHPO consultation regarding potential effects and~~

mitigation measures are in progress in order to complete the National Historic Preservation Act Section 106 process.

2. Additional Information: Add 3 rows at the bottom of Table 2-1. Summary of the alternatives, page 15, for approximate project costs:

Attributes	Alternative 1 No Action	Alternative 2 Realign Existing Service Road	Alternative 3 NPS Preferred: Construct New Access Road
Initial One-Time Approximate Costs	\$ 0	\$1,900,00	\$2,100,000
Recurring Annual Approximate Costs	\$ 4,350	\$5,450	\$11,375
Life-Cycle Approximate Costs	\$ 91,000	\$2,008,660	\$2,327,600