

National Park Service
U.S. Department of the Interior

Denali National Park and Preserve
Alaska



Finding of No Significant Impact

Hotel Creek Bridge Construction and Trail Reroute

November 2014

Recommended:

A handwritten signature in blue ink, appearing to be "E. R. Smith".

Superintendent, Denali National Park and Preserve

11/21/2014

Date

Approved:

A handwritten signature in blue ink, appearing to be "Herbert C. Frost".

Regional Director, Alaska

Herbert C. Frost

12/03/2014

Date

FINDING OF NO SIGNIFICANT IMPACT

Hotel Creek Bridge Construction and Trail Reroute Denali National Park and Preserve, Alaska November 2014

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate impacts of removing two pedestrian trail bridges over Hotel Creek, to construct one higher trail bridge, and to reroute connections for those two trails in the entrance area of Denali National Park and Preserve (DNA).

The NPS has selected **Alternative 2** – *Hotel Creek Bridge Replacement* (Preferred Alternative), with the mitigation measures. Under Alternative 2, the park will construct a pedestrian bridge over Hotel Creek that will serve both the Healy Overlook Trail and the Taiga Trail, and which will be elevated enough over the creek so as to not become an ice dam during the winter.

Responses to public comments are found in Attachment A.

ALTERNATIVES

The following two alternatives were evaluated in the EA.

Alternative 1, Existing Conditions (No Action Alternative)

Under the No Action alternative, the NPS would not replace the Hotel Creek bridges and visitors would continue to travel on existing bridges for the Hotel Creek crossings on the Taiga Trail and Mt. Healy Overlook Trails. Both bridges are about 30 feet long, made of local spruce, span the full width of the summer creek, and sit about 4 feet above creek level.

Alternative 2, Hotel Creek Bridge Replacement (NPS Preferred) (*Environmentally Preferable Alternative*)

Under Alternative 2, a 100 foot long by 6 foot wide fiberglass bridge will be installed to replace both the Taiga and the Mt. Healy bridges. This bridge design will allow for approximately 12 feet of freeboard under the bridge to reduce the likelihood of the bridge becoming encased in ice during the winter. The two existing bridges will be removed and existing trails will be reclaimed. New trail segments will be constructed to the east and west to regain the Mt Healy Overlook trail and the Taiga Trail, and the existing trail and new approach to the new bridge from the Denali Visitor Center (DVC) parking lot will be made to accessible standards. The bridge will be a box truss design that will be finished using natural materials such as Alaska yellow cedar decking and yellow cedar railings.

This project will require 410 feet of new trail to connect to the existing Taiga Trail, and 210 feet of new trail to connect to the existing Healy Overlook Trail. The gravel tread on the new trail segments will be 30” wide, with an average of 4 feet of disturbance

necessary during construction. Another 170 feet of new trail at 5 feet wide will allow the whole section from the DVC to the new bridge to be ABA (Architectural Barriers Act) accessible. There will be a total of 875 feet of trail from Taiga and Healy Overlook Trails that will be abandoned. The trails will continue in use during construction. All abandoned trails will be reclaimed using vegetation pulled from the new trail construction sites. Current trail surfaces of the Taiga Trail and Healy Overlook Trail will be harvested for reuse on the new sections of trail and 51 feet of bridge materials will be removed. The project will take place in the summer of 2015.

PUBLIC INVOLVEMENT

The EA was issued for public review and comment from August 18, 2014 to September 17, 2014. Paper copies of 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 NPS Planning, Environment, and Public Comment (PEPC) website and on the park's webpage. The park issued a press release about the availability of the EA and the open comment period on August 18, 2014. Seven written comments were received. All of the comments favored the action alternative, while two of the comments questioned the proposed bridge materials and one questioned the need to make the bridge approach accessible.

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 Attachment A.

DECISION

The NPS decision is to select a modified **Alternative 2, *Hotel Creek Bridge Replacement***, along with the mitigating measures.

Mitigating Measures

The following mitigation measures apply to the selected alternative, **Alternative 2, *Hotel Creek Bridge Replacement***:

Vegetation

- Vegetation mats that need to be removed from the trail surface will be saved and relocated to abandoned trail segments.
- Periodic surveys will be conducted to determine the presence of exotic plants. If exotic plants are found, the Vegetation Specialist will be consulted to determine the best course of action.
- Trails Supervisor will work with Vegetation Specialist to determine best course of action for revegetation efforts.

Wildlife and Habitat

-The NPS will follow established guidelines in the park's bear-human conflict management plan. The plan requires contractors and staff to use bear-proof containers for food and refuse, and sets up guidelines for temporary closures.

-To avoid destroying and/or disturbing occupied bird nests and cavity trees within the project area in accordance with the Migratory Bird Treaty Act (MBTA), park staff will take several measures including avoid cutting or removing vegetation during the nesting season for most species of birds (May 1 to August 1) and implement appropriate protective measures to protect any occupied bird nest discovered within the project area during the construction phase.

Cultural Resources

-If cultural resources or items protected by the Native American Graves Protection and Repatriation Act are discovered during this project, all project related activities in the vicinity of the discovery will be stopped and the park archaeologist will be notified immediately. Denali National Park and Preserve in consultation with the State Historic Preservation Officer and other consulting parties will determine a course of action per 36 CFR Part 800.13.

-Park archaeologist will determine if periodic monitoring of ground disturbance for the trail and bridge construction will be needed.

-Interpretation staff will work closely with the Park Archeologist to develop language for any signs interpreting cultural resources.

-If additional cultural resources are found in the project area prior to the implementation of the project, the bridge location will be adjusted in consultation with the park archeologist.

Visitor Experience and Opportunity

-Visitors will be advised in park announcements, programs, and publications that there will be temporary inconveniences from construction work on the trail.

Rationale for the Decision

The selected action (**Alternative 2, *Hotel Creek Bridge Replacement***.) will satisfy the purpose and need of the project better than the no action alternative. In addition to providing a safer and longer-season trails bridge, the new bridge will eliminate facility interference with the natural process of winter ice formation in the creek valley.

Alternative 1, *No Action*, would not accomplish the purpose and need of the project. The existing bridges invariably become encased in ice early each spring, thereby damming the valley and increasing the ice accumulation in those areas, and bringing about safety issues for trail users.

Significance Criteria

The selected alternative, ***Hotel Creek Bridge Replacement***, will not have a significant effect on the human environment. This conclusion is based on the following examination of 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 2, ***Hotel Creek Bridge Replacement***, on vegetation, soils and wetlands, wildlife and habitat, cultural resources, visitor experience and opportunity. As documented in the EA, Alternative 2 will have a minor effect on the area's vegetation and soils, while having no impact on cultural resources, a minor beneficial impact on wildlife and habitat by reducing the extent and duration of ice coverage of the floodplain, and a moderate beneficial effect on visitor experience and opportunities by providing trails that are not closed due to ice on the bridges in the Spring.

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

The selected alternative will have a beneficial effect on public health and safety because the project will improve visitor safety by providing a bridge that is not encased in slippery ice during the first half of the summer.

(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 installations will be located in the non-wilderness entrance area of a national park. The bridge site and new trail section areas will all be monitored for cultural resources during construction. A minor amount of non-unique wildlife habitat is involved with these sites.

(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 will not be controversial. The NPS sent the EA to over 200 agencies, organizations, and individuals for public review. All seven comment letters were in favor of the proposed action. The environmental analysis concluded that the proposed facilities will have no more than minor adverse impacts on park resources. Minor benefits to wildlife habitat are expected.

(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 2, ***Hotel Creek Bridge Replacement***) do not involve unique or unknown risks. The mitigations and best

management practices included with this decision will minimize risks to the public or wildlife populations.

(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.

Minor trail re-routes are not uncommon when trails constructed in the 1940s are brought up to modern standards. Cheaper low-to-the-water bridges should be replaced if they interfere with natural processes.

(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.

Upgrading and some re-routing of trails in the entrance area that are used by thousands of visitors each summer will continue, as stated in the 1997 Record of Decision for the 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 park has determined “No Historic Properties Affected” in its Section 106 compliance review for the proposal and has received concurrence from the State Historic Preservation Officer.

(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 will not adversely affect an endangered, threatened or proposed species or its critical 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 2, **Hotel Creek Bridge Replacement**) will not violate any Federal, State, or local law.

FINDINGS

The selected alternative complies with the NPS Organic Act (see Attachment C for non-impairment determination), ANILCA, the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 (floodplains) and 11990 (wetlands). There will be no restriction of subsistence activities as documented by the ANILCA, Section 810(a) Summary Evaluation and Findings.

The NPS 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 on the Environmental Assessment for Hotel Creek Bridge Construction and Trail Reroute Denali National Park and Preserve

In response to the environmental assessment, the NPS received 7 comment letters. Described below are the substantive comments and the NPS responses.

1. Comment #1. Two Individuals: The NPS should consider wood alternatives such as Trex or local woods such as spruce or birch rather than yellow cedar for the decking and railings.

NPS Response #1: DENA has used yellow cedar for about 15 years for railings and decking on such bridges as the Savage River Trail bridge, the Rock Creek pedestrian bridge and the Riley Creek bridge on the Triple Lake Trail. Alaska yellow cedar is chosen because it resists decay and needs less maintenance when exposed to the park climate much better than spruce or birch, and because it is a natural material from state sources.

2. Comment #2. One Individual: Is the need for an accessible approach to the new bridge compatible with the cost.

NPS Response #2: Only about 170 feet of new trail will be needed to connect the existing trail from the DVC to the new bridge. To make the 170 foot section accessible will require about 1 foot of extra width, using the same trail mix material, but with a greater emphasis on full compaction. The existing trail from the DVC already meets accessible standards for width, but is in need of a new thin layer of surfacing material and full compaction. The NPS is mandated by Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas, published in 2013, to make pedestrian trails accessible where the terrain allows. The additional effort in this case should not cost more than a few thousand dollars, and the trail to the bridge receives a lot of use in summers and is already due for additional surfacing material after one of the wettest summers on record in interior Alaska.

ATTACHMENT B

ERRATA to the Environmental Assessment for Hotel Creek Bridge Construction and Trail Reroute Denali National Park

This errata section provides clarifications, modifications or additional information to the EA and to the selected alternative, **Alternative 2**, *Hotel Creek Bridge Replacement*. 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. Replace this sentence on page 13:

“A 100 foot long by 6 foot wide fiberglass bridge would be installed to replace both the Taiga and the Mt. Healy bridges.”

With this sentence:

“A 100 foot long by 6 foot wide fiberglass or steel bridge would be installed to replace both the Taiga and the Mt. Healy bridges.”

This modification is necessary because current funding may not allow for the planned fiberglass bridge which would be more expensive than a steel structure.

ATTACHMENT C

NON-IMPAIRMENT DETERMINATION
for the
Hotel Creek Bridge Construction and Trail Reroute
in Denali National Park

The NPS Organic Act of 1916 and the General Authorities Act of 1970 prohibit impairment of park resources and values. The 2006 NPS Management Policies use the terms “resources and values” to mean the full spectrum of tangible and intangible attributes for which the park is established and managed, including the Organic Act’s fundamental purpose and any additional purposes as stated in the park’s establishing legislation. The impairment of park resources and values may not be allowed unless directly and specifically provided by statute. The primary responsibility of the NPS is to ensure that park resources and values will continue to exist in an unimpaired condition that will allow people to have present and future opportunities for enjoyment of them.

A determination of impairment is made for each of the resource impact topics carried forward and analyzed in the Hotel Creek Bridge Construction and Trail Reroute environmental assessment for the selected alternative (*Alternative 2, Hotel Creek Bridge Replacement*). The description of park significance in Chapter 1 was used as a basis for determining if a resource is:

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

Impairment determinations are not provided for visitor experience and opportunity because impairment determinations relate back to park resources and values. This impact area is not considered to be park resources or values subject to the non-impairment standard.

Vegetation, Wetlands and Soils

Little additional impact to vegetation and soils will occur under alternative 2. Under this alternative less than 0.1 acre of white spruce forest community, around 0.07 acres of evergreen forest wetland and a few inches of organic soil attached to the vegetation will be removed for the construction of the new trail segments. An 10% larger acreage of forest will be reclaimed by using vegetation and soils removed from the new trail construction sites in abandoned sections of the two trails. The limited vegetation and

wetlands removed will have a minor impact on the thousands of acres of similar taiga forest and other vegetation resources near the paved section of the park road corridor and these impacts will not result in impairment.

Wildlife and Habitat

Wildlife habitat for large mammals, small mammals, and birds will be reduced by less than 0.1 acres of white spruce forest community. An almost similar acreage of forest will be reclaimed by using vegetation removed from the new trail construction sites in abandoned sections of the two trails. A reduction of the acreage and duration of winter/spring ground icing will benefit mammal and bird use of habitat. During the construction period noise and human activity will disturb wildlife and cause them to be temporarily displaced from the affected and adjacent areas. The overall impacts will be long-term minor and beneficial, and the impacts from this alternative will not result in impairment.

Cultural Resources

The State Historic Preservation Officer has concurred that the lower section of the Healy Overlook Trail and the Taiga Trail segment to be relocated were not eligible for the National Register of Historic Places. Periodic archeological monitoring of the project may be appropriate. The impacts from this alternative will not result in impairment.

SUMMARY

The level of impacts to vegetation, wetlands and soils, wildlife and habitat, and cultural resources anticipated from implementing Alternative 2, *Hotel Creek Bridge Replacement*, will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.