



**National Park Service  
U.S. Department of the Interior**

**Hot Springs National Park  
Arkansas**

**FINDING OF NO SIGNIFICANT IMPACT  
Environmental Assessment**

Recommended:

  
\_\_\_\_\_  
Laura Miller  
Superintendent, Hot Springs National Park

7/26/2019  
Date

Approved:

  
\_\_\_\_\_  
Patricia S. Trap  
Acting Regional Director, Midwest Region, National Park Service

7.28.19  
Date

## INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS), Hot Springs National Park (hereafter Park) prepared an environmental assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to construct a 0.65-mile natural surface, trail connection from Pullman Avenue to the City of Hot Springs's (hereafter City) Northwoods Urban Forest Park ("the Pullman Avenue Trail Connection").

The purpose of the proposed action is to construct a hiking and biking trail through the park that would connect central and northwestern neighborhoods in the City to an extensive network of recreational trails throughout the Northwoods property. The project responds to a specific opportunity and needs identified by park and City leadership: *to provide visitors to the national park and residents of the City with a trail connection that both increases access to recreational opportunities and alleviates safety concerns from hikers and bikers accessing the North Woods area via Cedar Glades Road.*

During preparation of the EA, the National Park Service consulted with federal and state agencies, tribes, interested and affected parties, and the general public. The Park released the draft EA for public review from February 1, 2019 to February 15, 2019. The Park reviewed all 23 public comments received on the EA. The majority of comments expressed support for Alternative 2. One comment opposed mountain bike use on NPS trails in general and did not make reference to the proposal or analysis specifically. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the December 2018 EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

A special regulation is also required before the Superintendent can authorize the use of bicycles on new trails outside of a developed area of the park (36 CFR § 4.30). Promulgation of the special regulation is proceeding.

## SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Based on the analysis presented in the EA, the National Park Service selected the NPS preferred alternative, Alternative 2 described below, for implementation.

The selected alternative provides for trail connectivity through the park between a proposed trailhead at Pullman Avenue and ongoing trail development on City property at the park's northern boundary (refer to Figure 1: Selected Alternative). A multi-use, natural surface trail (bare soil or rock) of a gentle grade (3–5%) is approved for hiking and bicycle use. The selected alternative must comply with 36 CFR § 4.30 (the Bicycle Rule), which contains regulations that manage bicycle use within national park system units, prior to authorization of mountain biking on the approved trail. No equestrian use or motorized uses will be permitted, and the trail will not be Americans with Disabilities Act/Architectural Barriers Act (ADA/ABA) accessible. It will be approximately 0.65 mile in length and will not include the placement of gravel or boardwalks. The trail will be designed as a safe, sustainable route that would be maintained by the National Park Service and community partnerships for the recreational and health benefit of local residents and visitors. The trail will utilize landforms and natural features that exhibit the natural beauty of the area.

The trail will be built using sustainable trail construction techniques (refer to Appendix A of the EA: Trail Development Field Guide) by hand, using small machinery when necessary. It will be constructed and maintained using methods that minimize user conflict and maximize a natural surface texture, including bare soil and bedrock. The trail tread width will be 42 to 48 inches with

a 4-foot clearance corridor on either side, required for construction and safety. The trail will follow the natural contours of the site, winding around obstacles such as trees, large rocks, and bushes. Obstacles that could deter certain users such as jumps, rollers, or water-bars will not be present. Turns will be constructed sustainably but will not be cambered to optimize cornering traction for bicycles. The trail itself will cover 0.31 acre of park land, with up to an additional 0.62 acre of clearing along the sides of the trail (e.g., the safety clearance corridor). The total acreage of the trail will be 0.93 acre or less.

Trail construction will be undertaken by International Mountain Biking Association (IMBA) Trail Solutions staff with oversight by NPS personnel as needed. The cost of this 0.65-mile segment will range from approximately \$20,000 to \$30,000 and its construction will be funded by the City.

Pullman Avenue is currently gated near the park boundary and is frequently used for unauthorized access to the park via social trails. Pullman Avenue was previously a residential street with homes on either side. As these homes have been vacated, the lots have been added to the park and the structures have been removed. A paved road surface remains intact, and the portion beyond the existing gate is closed to vehicular traffic. The selected alternative includes construction of trailhead infrastructure on Pullman Avenue (refer to Section 2.1.4 of the EA – Connected Action) and will allow bicycle use on the portion of the road closed to vehicular use. The existing gate will be removed and replaced by a new administrative gate on NPS lands, a gravel vehicle turnaround feature, and bollards or similar to prevent public vehicle access but allow safe access for pedestrians and bicyclists.

For hikers and bicyclists, the proposed trailhead will serve as a formalized entry point to the park where currently there is none. The trailhead is planned on City lands to include parking (approximately 18 spaces, including two accessible spaces, with additional parallel parking for approximately 40 cars along Pullman Avenue to Congress Street), accessible restrooms with flush toilets, a bench, bike rack, trash receptacle, two bike work stations, drinking fountain, and an information kiosk to educate visitors and convey trail user and location information. The road will be widened to 24 feet to accommodate the parking spaces. No designated horse trailer parking is approved at the proposed trailhead.

## ***Rationale***

Alternative 2 was selected because it best meets the project's purpose to:

- Develop a trail solution that enhances visitor experience and safety while protecting natural and cultural resources.
- Accommodate hiking and biking, and reduce maintenance by using sustainable trail construction techniques and minimizing park infrastructure.
- Connect the park with adjacent City and county trail networks.

## **MONITORING GUIDELINES AND MITIGATION MEASURES**

The selected alternative incorporates the project design criteria (PDC) and best management practices (BMPs) listed in Attachment A of this document.

There is no potential for significant adverse impacts to park resources as a result of constructing the proposed trail and allowing hiking and mountain biking on that trail. The conclusion of no significant adverse impacts was determined based on scientific literature and professional judgement and knowledge from NPS staff, which is documented in the analysis of the EA.

## **SIGNIFICANCE CRITERIA REVIEW**

As defined in 40 CFR §1508.27, significance requires consideration of context and intensity. The following considerations, included in 40 CFR §1508.27, are relevant to this finding of no significant impact:

**Criterion 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 analyzed potential impacts on topics identified during internal and external scoping. There were no significant impacts identified, either beneficial or adverse. As described in the EA, the selected alternative has the potential for adverse impacts on geologic resources and soils, species of concern; access, traffic, and parking; visitor use and experience; and socioeconomics; however, no potential for significant adverse impacts was identified. Many positive impacts also were identified. The selected alternative impacts taken individually or as a whole as described in the EA do not reach the level of significance that will require analysis in an environmental impact statement (EIS).

**Criterion 2: The degree to which the proposed action affects public health or safety.**

Under the proposed action, there would be additional ways for visitors to experience the park and a slight increase in visitation. Due to the nature of mountain biking, there is an increased risk of injury on the trails, with the potential of severe injury if a biker is not using an appropriate helmet. The addition of biking on the trails may result in more visitors in the area and on the trails. There is a potential for risk of injury to visitors, by adding the recreational use of mountain biking on park trails. Given the 4-foot width of the multi-use trail, user conflict between cyclists and hikers is not expected. Visitors are expected to self-manage their risk, but some injuries are likely.

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

There will be no significant impacts on unique characteristics of the geographic area. Specific mitigation measures will ensure that unique characteristics such as cultural and historic resources of the park are protected; there are few known types of these resources in the project area. No prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas will be impacted.

**Criterion 4: The degree to which effects on the quality of the human environment are likely to be highly controversial.**

The Selected Alternative is not highly controversial as evidenced from public input and agency and tribal coordination. The trail modifications described in the EA are common actions throughout the Park and the nation, and their effects are well understood and not controversial.

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

The Selected Alternative does not involve highly uncertain effects on the human environment or involve unique or unknown risks. The trail modifications described in the EA are common actions throughout the Park and the nation, and their effects are well understood.

**Criterion 6: The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.**

The Selected Action does not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration. The construction and use of the Pullman Avenue Connector Trail does not imply future trail decisions for the rest of the Park.

**Criterion 7: Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.**

The impacts of the Selected Action are primarily temporary and localized and will not be incrementally significant when added to other past, present, and reasonably foreseeable future actions. The modifications in the Selected Action do not constitute actions with individually insignificant but cumulatively significant impacts.

**Criterion 8: The 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.**

After applying the Advisory Council on Historic Preservation's criteria of adverse effect (36 CFR Part 800.5, *Assessment of Adverse Effects*), the park concluded that implementation of the selected alternative will result in no adverse effect on archeological resources. The project will not result in the loss or destruction of significant scientific, cultural, or historical resources. The Arkansas Historic Preservation Office and Natural Heritage Commission were consulted and concurred in a letter dated December 18, 2018 with the determination of no adverse effect to historic properties listed, or eligible for listing, on the National Register of Historic Places.

**Criterion 9: The degree to which the action may adversely affect an endangered or threatened species or its critical habitat.**

The selected alternative will not adversely affect endangered or threatened species or critical habitat as discussed in the species of concern section of the EA (section 3.3). Minor adverse impacts to northern long-eared bat and tricolored bat habitat may occur as a result of hazard tree clearing during construction and maintenance of the proposed action. Negligible impacts to harperella are anticipated. Impacts to all three species of concern would be mitigated through the use of PDC and BMPs to identify the species and protect their habitats during construction, maintenance, and use of the proposed trail. The park determined that the selected alternative will have no effect on listed species. In addition, monitoring guidelines and mitigation measures will be implemented to avoid any adverse impacts resulting from trail modification actions (refer to Attachment A of this document). The park will continue to coordinate with US Fish and Wildlife Service (USFWS) and state resource agencies to monitor the status of species of concern, developing new mitigations and techniques as more is learned about these species and their habitat needs.

**Criterion 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 will not violate any Federal, state or local laws or requirements imposed for the protection of the environment.

**CONCLUSION**

As described above, the selected alternative does not constitute an action meeting the criteria that normally require preparation of an EIS. The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

## Attachment A: Monitoring Guidelines and Mitigation Measures

Congress has charged the NPS with managing the lands under its stewardship “in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (NPS Organic Act, 54 U.S.C. § 100101(b) et seq.). As a result, the NPS routinely evaluates resources and implements mitigation measures whenever conditions are present that could adversely affect the sustainability of national park system resources.

The following table details project design criteria (PDC) and best management practices (BMPs) incorporated into the selected alternative in order to minimize potential adverse impacts from construction and implementation of the NPS-preferred alternative. The PDC and BMPs are considered part of, and therefore required elements of, the selected alternative.

PDC and BMPs come from federal, state, and local laws, regulations, and policies; NPS professional and scientific recommendations; or from experience in implementing similar projects. The bulk of the PDC and BMPs provided in the following table are considered common practices for trail construction projects to prevent or decrease potential resource impacts (see also Appendix A of the EA: IMBA Trail Development Field Guide). They are highly effective methods that can be planned in advance and adapted to site conditions as needed.

Project Phase	PDC and BMPs
<b>General (Applies to All Phases)</b>	<ul style="list-style-type: none"> <li>• The proposed trail shall be designed and constructed to drain runoff away from wetlands and stream channels.</li> <li>• Trails shall be rock armored or elevated in steep sections or where erosion typically occurs.</li> <li>• The trail shall not be routed directly down the fall line. Drainage structures shall be located above steep stretches of trail to minimize water routed into these areas, and the frequency of such structures shall increase in steep areas.</li> <li>• To provide for proper drainage, the trail shall not be routed near the bottom of ephemeral draws or other low spots.</li> <li>• The trail shall be designed and constructed using natural topography to create grade reversals or rolling dips to provide adequate drainage. Where grade reversals or rolling dips are not practical, check dams, water-bars, and sediment traps shall be utilized.</li> <li>• The trail shall be managed with seasonal closures as needed to avoid the development of ruts when soils are saturated.</li> <li>• Vegetative buffers of approximately 20 feet shall be maintained adjacent to intermittent or perennial drainages and wetland areas.</li> <li>• All equipment and vehicle washing will be performed off-site.</li> </ul>
<b>Pre-Construction</b>	<ul style="list-style-type: none"> <li>• A site visit and field-fitting of planned projects, paths, and roads shall occur by NPS and IMBA staff before construction may begin.</li> <li>• NPS staff shall provide noxious weed management guidelines for use by the contractor prior to implementation of any ground-disturbing activities. Pretreatment of existing noxious weed infestations within the project area shall occur prior to project implementation when possible.</li> <li>• NPS staff and contractor shall determine appropriate means of erosion control during pre-construction site visit.</li> <li>• The project administrator shall inspect all off-road equipment prior to entering NPS lands to ensure that they are free of soil, seeds, vegetative matter, or other debris that could contain or hold noxious weed seeds. “Off-road equipment” includes all construction machinery, except for trucks, service vehicles, water trucks, pickup trucks, cars, and similar vehicles.</li> </ul>

	<ul style="list-style-type: none"> <li>• Prior to commencement of any earthwork, flagging would be located on the site to ensure that machine-operated activity is focused on targeted areas only. Leave trees and trail clearing limits shall be adequately marked.</li> <li>• NPS staff shall train IMBA trail crew members on identification of harperella and other species of NPS concern and provide guidelines on suitable plan of action should they be encountered.</li> </ul>
<p><b>During Construction</b></p>	<ul style="list-style-type: none"> <li>• International Mountain Bicycling Association trail-building guidelines shall be followed when constructing the mountain biking trail. See Appendix A.</li> <li>• If undocumented historic or archeologic resources are located during ground-disturbing activities or planning activities associated with approved construction activities, all construction in the immediate vicinity shall cease and properties shall be treated as specified in 36 CFR Part 800, Protection of Historic Properties.</li> <li>• If any previously undocumented threatened, endangered, proposed, or candidate species are encountered within the project area prior to or during project implementation, the NPS shall be notified. The NPS shall develop suitable protection measures to avoid or minimize impacts as appropriate.</li> <li>• Straight edges shall be avoided where possible when removing trees. Variable density cutting (feathering) and age and size class selection shall be utilized to create a more natural edge that blends into the existing vegetative structure.</li> <li>• Stumps in the trail tread and trail clearance corridor shall be cut as low as possible to the ground to avoid safety hazards.</li> <li>• All construction activities shall be confined to daylight hours, excluding emergencies.</li> <li>• Construction activities will be halted while the ground is saturated following large rain events.</li> <li>• Restrict the removal of snags and coarse woody debris to that necessary to meet safety standards. Leave other snags and woody material on-site to benefit species dependent upon these habitat structural elements. Snags and nest trees identified during pre-construction wildlife surveys (conducted as needed) will be retained, unless they pose a hazard to human health; then they will be retained until the end of the nesting period if potentially occupied.</li> <li>• Unauthorized hiking and mountain biking trails developed by third parties shall be promptly deconstructed and reclaimed as they are discovered.</li> <li>• All hazardous waste materials such as oil filters, petroleum products, and equipment maintenance fluids will be stored in structurally sound and sealed containers in the hazardous materials storage area and segregated from the other non-waste materials. Secondary containment would be provided for all materials in the hazardous materials storage area and would consist of commercially available spill pallets. Additionally, all hazardous materials would be disposed of in accordance with federal, tribal, and state regulations. All personnel would be instructed, during tailgate training sessions, regarding proper procedures for hazardous waste disposal. Notices that state these procedures would be posted and the individual who manages day-to-day site operations would be responsible for seeing that these procedures are followed. Any waste generated would be properly disposed of in a trash bin, located on-site, and hauled off promptly at site closure.</li> <li>• Any waste generated would be properly disposed of in a trash bin located on-site and hauled off promptly at site closure. All outdoor trash containers and locations with food residue shall be bear proof. All food products stored outside of a building shall also utilize bear proof food containers. No food products or food containers shall be disposed of in larger roll-off type dumpsters.</li> <li>• Construction equipment and maintenance materials would be stored at the staging area. Nonhazardous materials such as silt fencing, tools, etc. would be stored in plastic containers within the storage area.</li> <li>• No food or drink shall be stored overnight in construction vehicles on site. All windows shall be kept closed and doors locked on all vehicles to prevent bear entry.</li> <li>• All major equipment and vehicle fueling and maintenance would be performed off-site. A fuel tank would be kept off-site at a staging area. Minor equipment maintenance only would occur on-site. Drums, stored on spill pallets, would be used to store any equipment fluids generated from maintenance activities. Absorbent, spill-cleanup materials and spill kits would be located at the staging area. All equipment</li> </ul>

	<p>receiving maintenance and vehicles and equipment parked overnight would have drip pans placed beneath them.</p> <ul style="list-style-type: none"> <li>Workers shall not bring dogs or other pets on NPS lands during construction.</li> </ul>
<p><b>Post-Construction</b></p>	<ul style="list-style-type: none"> <li>Trail edges will be promptly revegetated upon completion of trail construction.</li> <li>All multi-use trails shall have appropriate signage to direct uphill and downhill traffic and prevent user conflicts. A sign plan shall be reviewed and approved by Hot Springs National Park prior to installation of signage.</li> <li>Some of the slash generated from tree-removal operations may be mulched, and the mulch applied to the surface of disturbed areas for both temporary and permanent stabilization. Invasive vegetation shall not be mulched and spread when it is in seed.</li> <li>Downed woody debris resulting from construction activities should not be left in place due to concerns about fuel loading and potential for exacerbated wildfire impacts.</li> <li>All areas disturbed by construction shall be re-vegetated with native plant species using a NPS-approved seed mix, and shall meet ground cover standards within three years after completion of project construction. All mulch used in re-vegetation efforts shall be certified to be free of weed species.</li> </ul>

## Attachment B: Non-impairment Determination

### ***What is Impairment?***

National Park Service's *Management Policies, 2006* requires analysis of potential effects to determine whether or not actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within a park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of these resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact will be more likely to constitute an impairment when there is a major or severe adverse effect upon 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
- Identified as a goal in the park's general management plan or other relevant NPS planning documents.

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

The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold for considering whether there could be an impairment is based on whether an action will have major (or significant) effects.

### ***How is an Impairment Determination Made?***

Section 1.4.7 of *NPS Management Policies* (2006) states:

*In making a determination of whether there will be an impairment, an NPS decision-maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969; consultations required under Section 106 of the National Historic Preservation Act; relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.*

*NPS Management Policies* (2006) further defines "professional judgment" as:

*A decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relative to the decision.*

### ***Non-impairment Determination for the Selected Alternative***

This determination on non-impairment has been prepared for the selected alternative described in the Finding of No Significant Impact and in the [Pullman Avenue Trail Connection Environmental Assessment](#). Impairment findings are not necessary for visitor use and experience, socioeconomic, access traffic and parking, because impairment findings relate back to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources.

**Geologic Resources and Soils**—Short-term, adverse impacts to soil resources would occur during the construction phase of the proposed action, as trail crews and equipment would disturb upper soil horizons to construct the trail. PDC and BMPs during construction would reduce the extent and intensity of these impacts. In the long-term, soil erosion would continue to occur through trail use and perhaps as a result of climate change-induced exacerbation of severe rain events. Cumulative impacts on soils would result from construction of this trail when considered with the impacts on soils across the park from similar recreational activities. Impacts on soils would be minor in the long-term but would be mitigated to some degree through the use of BMPs and mitigative measures. Impacts on park geology are anticipated to be negligible. The selected alternative will not result in impairment of soil resources in the park.

**Species of Concern**—Minor adverse impacts to northern long-eared bat and tricolored bat habitat may occur as a result of hazard tree clearing during construction and maintenance of the proposed action. Negligible impacts to harperella are anticipated. Impacts to all three species of concern would be mitigated through the use of BMPs to identify the species and protect their habitats during construction, maintenance, and use of the proposed trail. Overall, the NPS believes there would be no effect to Federally listed species under this alternative, and no impairment.



United States Department of the Interior  
NATIONAL PARK SERVICE  
Hot Springs National Park  
101 Reserve Street  
Hot Springs, Arkansas 71901



In Reply Refer To:  
1.A.2 (Compliance)

Memorandum

To: Regional Director, Midwest Region

From: Superintendent, Hot Springs National Park 

Subject: Written Determination: Bicycle Use on Pullman Avenue Trail Connection

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Hot Springs National Park (hereafter Park) prepared an Environmental Assessment (EA) for the Pullman Avenue Trail Connection that analyzed the impacts of the proposed bicycle use of a 0.65-mile natural surface, multi-use trail connection from Pullman Avenue to the City of Hot Springs's (hereafter City) Northwoods Urban Forest Park ("the Pullman Avenue Trail Connection"). Currently, bicycle use in the park is limited to roads only.

The Regional Director signed a Finding of No Significant Impact (FONSI) for this project concurrent with the signature of approval on this written determination. Designating the new trail as a route open to bicycle use requires a written determination that such use is consistent with the protection of the park area's natural, scenic, and aesthetic values; safety considerations and management objectives; and will not disturb wildlife or park resources (36 CFR 4.30(e), as discussed below). The EA and the FONSI provide information and context for this written determination—including specific analysis of the potential effects of bicycle use on park resources—and can be found on the park's planning website at <http://parkplanning.nps.gov/hotsprings>

A special regulation is also required before the Superintendent can authorize the use of bicycles on new trails outside of a developed area of the park (36 CFR § 4.30). Promulgation of the special regulation is proceeding.

## PARK BACKGROUND

Hot Springs National Park is located in Garland County, central Arkansas. The City, with an approximate population of 37,000, lies immediately adjacent to the park. The park's vegetation, thermal waters, cold-water springs, bathhouses and associated cultural features, nearly 26 miles of hiking and equestrian trails, prehistoric and historic novaculite quarries, and general physical geography combine to form a 4,877-acre area of resource preservation and interpretation that is under the exclusive legislative jurisdiction of the federal government. Another approximately 670 acres are within the park boundary but are not federally owned. The park preserves and manages its natural and cultural resources for over 1.5 million annual visitors. The park purpose,

significance, values, and management objectives are summarized below to provide important context for this determination.

## **Purpose of the Park**

Congress created the park in 1832 when it designated the land as Hot Springs Reservation, making it the first area nationwide to be set aside for protection by the federal government. In 1921, Congress designated the reservation as Hot Springs National Park. The purpose of the park is “to protect its unique geothermal spring water and associated lands for public health, wellness, and enjoyment.”

## **Significance of the Park**

The park’s significance statements express why the park resources and values are important enough to merit national park unit designation. Significance statements describe why an area is important within a global, national, regional, and system-wide context. These statements are linked to the purpose of the park unit, and are supported by data, research, and consensus. Significance statements describe the distinctive nature of the park and inform management decisions, focusing efforts on preserving and protecting the most important resources and values of the park unit. The following significance statements have been identified for the park. (Please note that the sequence of the statements does not reflect the level of significance.)

1. Hot Springs National Park is the only national park that protects a unique combination of lithology, geologic structure, and water sources that produce the only nonvolcanic geothermal springs of such high quality (temperature, taste, color, odorless) in the United States.
2. Hot Springs National Park is the only national park in the United States established to promote a holistic approach to health by ensuring public access to geothermal water, the surrounding natural environment, and other public recreational landscapes.
3. Hot Springs National Park offers unparalleled opportunities for research of a geothermal hydrologic system that has been geologically stable for 200 million years such as the study of the recently discovered globally unique thermophilic life forms and other yet-to-be-discovered resources.
4. The Bathhouse Row National Historic Landmark, which contains the largest collection of early 20th century bathhouses in the United States and the Grand Promenade, showcases the evolving approach to the architectural and landscape design of spa resorts.
5. The thermal springs in Hot Springs National Park were the first, and continue to be, the only federally controlled hot springs in the United States to be managed for both public health and consumptive use. Hot Springs National Park is the only unit of the national park system that is mandated to give away its primary natural resource to the general public in an unending and unaltered state.

## **Values of the Park**

The park’s Foundation Document also identifies fundamental resources and values for the park. These are features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance.

The Foundation Document identified thermal water and all components, water collection and distribution system, public interaction with geothermal water and the natural environment for the

promotion of holistic human health, cultural landscape, including the Bathhouse Row National Historic Landmark, and the museum collection as the fundamental resources and values of the park.

### **Management Objectives for the Park**

The Hot Springs National Park Resources Management Plan provides direction for management of the park. Management objectives for the park are also guided by NPS Management Policies 2006. These policies direct Superintendents to develop management plans that ensure recreational uses in the park provide for visitor enjoyment, but do not cause unacceptable impacts on park resources or values. They also emphasize the need for alternative transportation systems, especially those that promote non-motorized means of accessing and moving within parks.

### **CONSISTENCY WITH 36 CFR 4.30**

Pursuant to 36 CFR 4.30, the Superintendent has examined the addition of bicycle use on the proposed trail to ensure it is consistent with the protection of the park's natural, scenic, and aesthetic values; safety considerations; management objectives; and will not disturb wildlife or park resources.

### **Park Values and Management Objectives**

Protecting natural and cultural values while promoting a culture of health and wellbeing is a major focus for the park, as identified in the park's Foundation Document and Resources Management Plan. Integrating bicycle use on the new Pullman Avenue Trail Connection trail would expand the visitor experience by increasing options for non-motorized recreation in the park and community, while continuing to protect natural, and aesthetic values. Visitors and residents of nearby communities would have more opportunities for bicycling, and this would connect to other significant mountain biking opportunities on adjacent City properties.

#### *Visitor Experience*

Bicycle use on the proposed new trail would improve the quality of the visitor experience, by expanding recreational opportunities and providing for new visitor experiences within the park, while promoting the health and well-being of park visitors.

#### *Protection of Resources*

Management and protection of park resources will continue through the implementation of project design criteria, as presented in the EA.

### **Safety Considerations**

The NPS would implement the following safety measures:

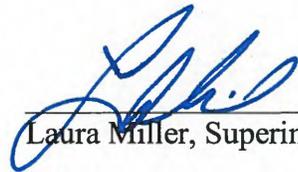
- Supporting compliance with state bike helmet regulations.
- Installing appropriate signage to direct bicycle traffic and prevent user conflicts.
- Following International Mountain Bicycling Association trail-building guidelines when constructing the mountain biking trail.
- Maintaining the trails, which may include periodic resurfacing and stabilizing of slopes.

## Wildlife and Park Resources

The proposed new trail, and the decision to allow bicycle use on the trail is not expected to have any significant impacts on resources or wildlife. Analysis of potential impacts in the EA and FONSI concluded that resources and values in the park, including cultural and natural resources and sensitive species, would not be impaired or significantly impacted by bicycle use on the new trail. There are no expected impacts to water resources resulting from the new trail because the trail would not be located near water resources in the park. Impacts to vegetation would be small in scale and localized; no large-scale clearing is proposed. The actions would not have an effect on listed species. Project design criteria for cultural resources were included in the event that historic or archeologic resources are discovered during construction of the multi-use trail.

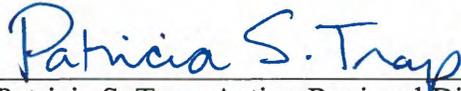
## FINAL DETERMINATION

Based upon the foregoing and as required by 36 CFR 4.30, the NPS has determined that bicycle use on the Pullman Avenue Trail Connection at Hot Springs National Park evaluated in the EA and FONSI is consistent with the protection of the park's natural, scenic, and aesthetic values; safety considerations; management objectives; and will not disturb wildlife or park resources.



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Laura Miller, Superintendent, Hot Springs National Park

7/26/2019  
Date



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Patricia S. Trap, Acting Regional Director, Midwest Region

7.28.19  
Date