

Finding of No Significant Impact

Centennial Grove Trail and Berry Glen Connector Trail

2020

Introduction

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to select the preferred alternative in the construction of the Centennial Grove Trail and Berry Glen Connector Trail at Redwood National Park. This alternative was evaluated against a no action alternative and the two considerations were analyzed in the EA. This FONSI documents the NPS determination that no significant impacts to the quality of the human environment will occur from the construction of the Centennial Grove Trail and Berry Glen Connector Trail.

Selected Action and Rationale for the Decision

The selected alternative consists of all actions described as proposed in the EA –there are no modifications based on public comment or agency scoping. Under the selected alternative, the park will construct approximately 5266 feet of trail in Redwood National Park (REDW). The trail would connect a proposed visitor center north of Orick, California with existing park trails in the Lost Man, Davison, Prairie Creek, and Redwood Creek areas and beyond. On a regional scale, the trail would serve as a new segment of the California Coastal Trail, an organization that seeks to connect 1200 miles of California coast with a single trail.

The trail would provide direct access to old-growth redwoods from a proposed NPS visitor center. The trail will span the distance between the proposed visitor center and the Berry Glen Trail which links into the popular Lady Bird Johnson Grove (LBJ) and other areas of the park.

The no action alternative, as stated in the Environmental Assessment (EA) would mean that there would be no change from the current management direction. Since the trailhead and trail are approximately 1/4 of a mile away from the proposed visitor center there was not a concern that the project site would be impacted by social trails, nor is there an expectation that forest closer to the proposed visitor center will be impacted by social trails or other visitor-related adverse impacts.

Purpose and Need

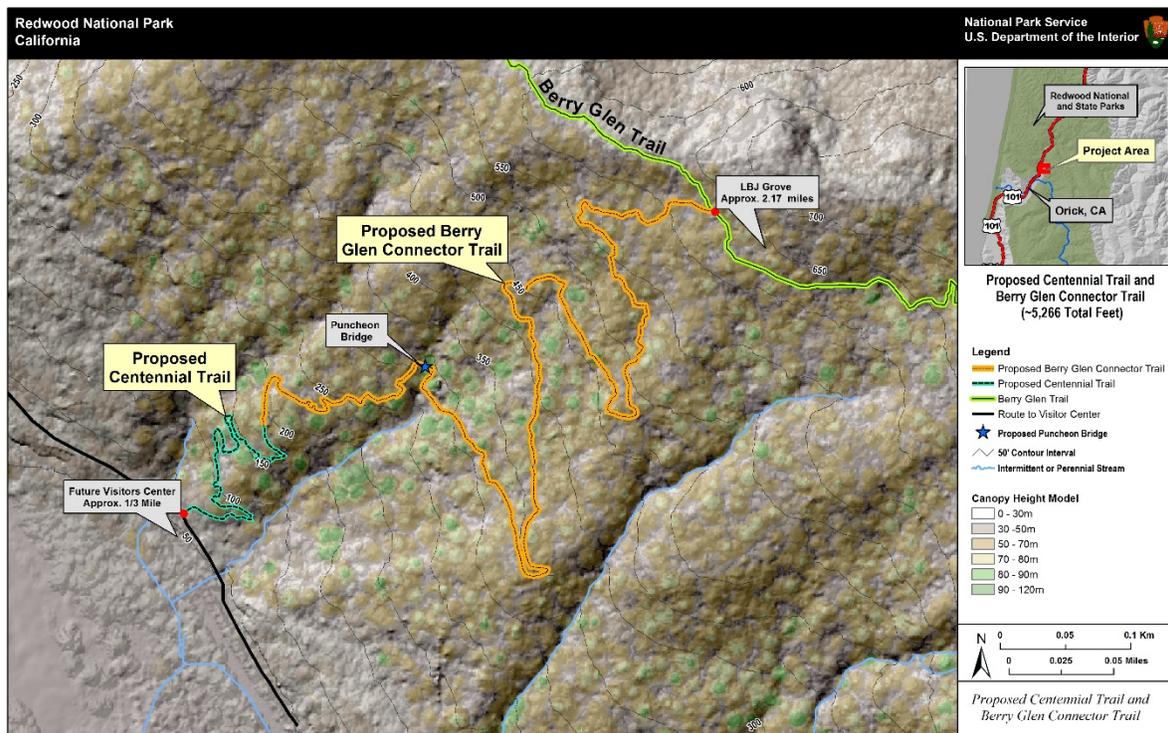
The purpose and need for the construction of the trail are overlapping. The purpose of the action is to construct a trail that will connect the proposed visitor center complex to other park and regional trails. Access from a visitor center is something the park does not currently offer. The trail will create additional recreational opportunities for hiking in Redwood National Park, and it will connect visitors to old growth redwood forest by providing direct access. The trail will also contribute to the California Coastal Trail.

Additionally, the proposed trail may lead to less congestion at the LBJ trailhead and reduce the number of cars parking in undesignated parking areas as visitors may choose to access trails from the proposed visitor center via the trail. The trail could also serve larger groups such as busloads of school children or tour groups from the proposed visitor center site. This too may reduce congestion at other sites.

The need for action derives in part from Redwood National Park Trail and Backcountry Management Plan (NPS, 2009) in which new trails and links from park trails to regional trails, including the California Coastal Trail, were stated goals. There is also currently a need to manage traffic congestion and reduce parking in undesignated areas. Currently, overcrowded parking lots and parking in undesignated areas is a safety and resource concern.

Centennial Grove Trail and Berry Glen Connector Trail Construction and Location Details

Under the selected alternative, an approximate 5266-foot trail would be constructed. One section of the trail will be referred to as the Centennial Grove Trail and the other section will be called the Berry Glen Connector Trail. The difference between the two is in name only and may be interchangeable. The Centennial Grove Trail section would be a short hike up the slope and around a short loop and a back to the trailhead. The section referred to as the Berry Glen Connector refers to the trail in the larger context of being a connection to the Berry Glen Trail and sites beyond. The entire length of trail will be constructed as one undertaking.



Site Plan 8/2020 (Redwood National Park files)

The trailhead would be located near (approx. ¼ mile) the proposed visitor center and parking area on a roadbed-turned-path formerly associated with logging operations that runs along the base of the hillslope parallel to US Highway 101. The trailhead will be located at an elevation of 60 ft. above sea level and the trail terminates at 620 ft. elevation. The trail will not meet accessibility guidelines due to the steep grade of the hillslope.

From the trailhead, a 5 ft. wide section of trail will wind uphill approximately 750ft. to an area where the trail becomes a loop; 189 ft. on its north side and 32 ft. on its south side. Beyond that, the trail continues uphill and terminates at the Berry Glen Trail approximately 4,004 ft. from the loop.

During the first phase of construction, a trail dozer and other power equipment will be used to clear downed logs within the proposed trail corridor. Approximately 20 trees, 16in. diameter at breast height (DBH) and under, will be cut. This phase is estimated to take 10 to 12 weeks due to the amount and size of downed logs needing clearing. After clearing, work will include selective removal of vegetation and roots from the trail and up to 4 ft. beyond the trail, so a clear path is delineated.

The trail route is laid out to minimize removal large trees or large numbers of smaller trees. When appropriate, crib walls filled with native soil will be built to preserve the roots of trees impacted by trail construction. Fill materials and rock will be gathered from the project site as it is cleared. Cut and fill will be balanced. There will be no need to remove fill from the site or acquire off site fill for the project.

The amount of soil disturbance created during trail construction will vary considerably throughout the route, depending on the cross slope, terrain, and natural obstacles. The depth will vary on average from a few inches, to about 4 ft. deep. At one site, there will be a 4 ft. wide by 10 ft. long puncheon bridge constructed to span a wet area. Minimal excavation will be needed to level and place plastic lumber footings to support the bridge. The area of disturbance will be approximately 16in. wide by 6 ft. wide by 6 ft. long by 8 ft. deep for each footing. Wattle and silt fencing will be used as needed for erosion control.

This trail will be sited between two drainages to avoid crossing active waterways. Rolling grade dips will be constructed to control anticipated water accumulation and run-off that may occur during storm events. In the few areas where the trails cross small springs, they will be treated with a combination erosion fabric placed under a compacted layer of native rock to preserve native drainage areas.

Duff and vegetation will be collected on the route ahead of the excavation process and stored in various locations along the route. The duff will be placed on the trail tread and slopes to cover disturbed soil surfaces, to reduce possible silt movement, and to increase the speed of revegetation where needed. Ferns and other selected plants will be salvaged and stockpiled during the excavation process for replanting.

Work will begin after noise restrictions lift in September to avoid adverse impacts to threatened wildlife species that occur in old growth redwood forests.

Public Involvement

The NPS did not conduct public scoping specifically for the proposed trail construction. Instead, the trail was included in discussions about the proposed visitor center. The discussions were presented in meetings and announcements from partners and other avenues, including development proposals submitted to Humboldt County Planning Division in 2012 by the Redwood Parks Lodge Company (County of Humboldt 2012).

Redwood Community Action Agency, Save the Redwoods League, and Cal Trout engaged in outreach for the Prairie Creek Gateway Trail Plan and the idea of a proposed connector to the Berry Glen Trail. (RCAA 2017).

In June 2016, the parks and the League celebrated the NPS Centennial at the site of the proposed visitor center. Over 1,000 people attended the Centennial celebration. The trails planning team provided information and received feedback on the potential to link the mill site to the California Coastal Trail and the REDW trails system.

During the 30 day period in which the EA was released to the public for comment (Aug 19, 2020- Sept, 17, 2020), six comments were received via the NPS PEPC Park Planning, Environmental & Public Comment website and one comment of support was received via email to the park's planning and compliance chief. None were substantive comments that would have necessitated changes to the draft EA, and most conveyed support for the project. If significant impacts are identified at any point in the EA process, the project will be immediately elevated to an EIS, or the offending alternative may be dropped in favor of another alternative without significant impacts. This was not the case in this instance, and the park did not respond to the comments as none were substantive and there is no accompanying errata to this FONSI that addresses the contents of the comments.

Agency Consultation

SECTION 7 OF THE ENDANGERED SPECIES ACT

A letter of concurrence from the US Fish and Wildlife Service (USFWS) was received by REDW in 2020 in response to the Biological Assessment (BA) the park submitted to USFWS. To summarize, the findings are that none of the activities described in the Proposed Action will disturb or result in the direct injury or mortality of federal or state endangered, threatened or proposed threatened species including spotted owls, marbled murrelets, fishers or martens.

No fish-bearing waterways would be affected by construction of the trail. Due to this, the NPS did not consult with National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) fisheries on impacts to threatened fish species.

SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT AND NATIVE AMERICAN TRIBAL CONSULTATION

There were no National Register of Historic Places-eligible properties found in the project area. The NPS consulted the California State Historic Preservation Officer (SHPO) and federally recognized Tribes in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR 800 in the spring of 2020, and the SHPO had no objection to the proposed Finding of No Historic Properties Affected for the undertaking as described by the NPS (SHPO) letter to Redwood National Park (6/24/2020).

NPS conducted Tribal consultation with the Yurok Tribe, Big Lagoon Rancheria, Trinidad Rancheria, Elk Valley Rancheria, Resighini Rancheria, and Hoopa Valley Tribe regarding this undertaking. None of the Tribes expressed concerns to REDW about the project.

Why the Selected Alternative will not have a Significant Effect on the Human Environment

Using the ten significance criteria as defined in the Council on Environmental Quality's NEPA regulations (Section 1508.27), the NPS has determined that the Preferred Alternative can be implemented with no significant adverse impacts. The following criteria were used to determine the significance of each impact.

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 may be beneficial.*

All potential impacts were identified in the EA and none rise to the level of significance. The selected alternative benefits the area by providing increased access to park resources, namely the redwood forest. The negative effects to wildlife, vegetation, cultural resources, geology and wilderness are minimal, and adverse effects will be far below the level of significance.

2. *The degree to which the Selected Alternative affects public health and safety.*

The selected action will improve the safety of visitors by eliminating some of the illegal parking that is currently utilized to access park areas in or near the project area.

3. *Unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).* As analyzed in the EA, there will be no significant effects on any unique characteristics of the geographic area.

4. *Degree to which impacts are likely to be highly controversial.*

Neither the project nor its effects are highly controversial. During the public review of the EA, no issues were raised.

5. *Degree to which impacts are highly uncertain or involve unique or unknown risks.*

There were no highly uncertain, unique, or unknown risks identified for park resources.

6. *Whether the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.* The selected alternative neither establishes a precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.

7. *Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects.*

The impacts of the selected alternative on each impact topic were identified in the EA. Cumulative impacts to each resource were also identified and none will have cumulatively significant effects.

8. *Degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.*

The project would not affect any properties eligible for the National Register. Trail construction as described in the Proposed Action and design would have no impact on limiting access to any ceremonial or sacred use sites or substantially adversely affect the physical integrity of sacred sites.

9. Degree to which an action may adversely affect an endangered or threatened species or its habitat. There will be no adverse effects to endangered or threatened species from trail construction. The Park did a thorough investigation of the potential for impact and the US Fish and Wildlife Service concurred with the Park's finding that the Proposed Alternative will not disturb or result in the direct injury or mortality of wildlife.

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 does not violate any federal, state, or local law, or requirements imposed for protection of the environment.

Conclusion

Implementation of trail construction as described in the EA will not have significant impacts on the human environment. The determination is sustained by the analysis in the EA, agency consultations, and the consideration of public comments. Adverse environmental impacts that could occur are negligible to minor in intensity, duration, and context. As described in the EA, there are no highly uncertain controversial or unacceptable impacts, unique or unknown risks, significant cumulative effects, or elements of precedence. There are no previous, planned, or implemented actions, which in combination with the selected alternative will have significant effects on the human environment. Requirements of the National Environmental Policy Act have been satisfied and preparation of an Environmental Impact Statement is not required. The park will implement the Selected Alternative as soon as practical. Work will be done in accordance with NEPA and regulations of the CEQ (40 CFR 1508.9), an Environmental Impact Statement will not be prepared.

Recommended

Steven Mietz	Date
Superintendent, Redwood National Park	

NAME	Date
Linda Walker	
Acting Regional Director, Interior Regions 8, 9, 10 and 12	

Appendix A: Determination of Non-Impairment

The Prohibition on Impairment of Park Resources and Values

NPS Management Policies 2006, §1.4.4, explains the prohibition on impairment of park resources and values: “While Congress has given the Service management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the 1916 Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them. The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by the legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.”

What is Impairment?

NPS Management Policies 2006, §1.4.5, What Constitutes Impairment of Park Resources and Values, and §1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment. “Impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values.” §1.4.5 of Management Policies 2006 states:

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

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park’s general management plan or other relevant NPS planning documents as being of significance.”

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may, but would not necessarily lead to impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.” Per §1.4.6 of Management Policies 2006, park resources and values at risk for being impaired include:

- “the park’s scenery, natural and historic objects, and wildlife, and the processes and condition 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, structure, 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 Determination for the Selected Alternative

Based on the evaluation of potential impacts identified in the EA, the topics evaluated for impairment include the following:

Air quality-Mitigation measures for construction activities remediate impacts to air quality.

Soils and topography- Mitigation measures for construction activities remediate impacts to soils and topography.

Hydrology and water quality- Mitigation measures for construction activities remediate impacts to hydrology and water quality.

Vegetation-Typical mitigation measures for construction activities remediate impacts to vegetation.

Wildlife and fish-Typical mitigation measures for construction activities remediate impacts to wildlife and fish.

Cultural resources-Excavation to be monitored by an archeologist if needed.

Visitor use and experience-The Proposed Action will have long term benefits as it will open up access to old-growth redwood forests to visitors and provide a connection between park and regional trails.

Socioeconomics- The Proposed Action may contribute to an economic benefit to the local economy and serve a community of visitors that has not been served in the past by creating access to old-growth redwood forest from a developed area.

Summary

As described above, adverse effects and environmental impacts anticipated as a result of implementing the selected alternative on a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the park, general management plan, or other relevant NPS planning documents, will not rise to levels that will constitute impairment of park values and resources in Redwood National Park.