



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

**Denali National Park and Preserve
Interior Region 11 - Alaska**

**FINDING OF NO SIGNIFICANT IMPACT
Winter and Shoulder Season Visitor Services**

Recommended:

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Date

Approved:

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Date

1. Introduction

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with proposed limited infrastructure and management actions addressing winter and shoulder season visitor services in Denali National Park and Preserve (Denali). These actions are needed to equip the NPS to anticipate changes to winter and shoulder season visitation and more effectively manage visitor services and opportunities during these times of year. Recent growth and diversification of off-season visitation necessitated a reexamination of the visitor experience offered in Denali during the winter and shoulder seasons, as well as the potential resource impacts from possible alterations to visitor services and facilities.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, NPS selected Alternative 2 – Varied Experiences (the NPS preferred alternative).

The selected alternative will allow the following actions summarized below and described fully in the Alternative 2 description in the EA:

- Allow private vehicle access to the Denali Park Road (Park Road) west of Headquarters to the Teklanika rest area after the first winter weather event of the fall
- Plow a portion of the Park Road during winter months, up to approximately mile 12 beginning in February
- Install a seasonal footbridge near Mountain Vista to facilitate access to traditional winter routes
- Create a connector trail for mushing access at the Mountain Vista rest area
- Allow commercial guiding for non-motorized winter recreation in some areas of the Denali wilderness
- Groom trails in the park entrance area, and potential trails in the Nenana River area
- Allow concessioner transit and tour bus service starting early to mid-May
- Allow parking on the Park Road in identified locations west of the Savage River for private vehicles during the shoulder seasons
- Open the Savage River and Teklanika campgrounds earlier in the spring and later into the fall

- Install facilities at the Teklanika rest area including parking lines, signs, and informational kiosks
- Provide seasonally specific detail to established desired conditions

The analysis in the Extent Necessary Determination in Appendix B of the EA established that commercial guiding for skiing, snowshoeing, and mushing is necessary in some areas of Denali to preserve wilderness character. Therefore, the selected alternative as described in this FONSI amends the *2006 Backcountry Management Plan* by allowing for guided skiing and snowshoeing in management areas OP1 and Backcountry Hiker, and by prohibiting commercially guided skiing, snowshoeing, and mushing in management areas OP2 and D.

Rationale

Alternative 2 was selected because it best meets the purpose of addressing growing and diversifying visitation during the winter and shoulder seasons. Alternative 2 also accomplishes the winter and shoulder season objectives first described in the *2019 Winter and Shoulder Season Plan* and subsequently adopted in the *2020 Winter and Shoulder Season Visitor Services EA*. These objectives include:

1. Provide visitor opportunities and facilities that the NPS can sustain, regardless of changes to visitation and factors beyond the control of the NPS (e.g., climate, wildlife behavior, length of daylight, funding levels).

The selected alternative provides visitor opportunities that are primarily contingent upon management decisions that do not require large investments in new facilities or other irretrievable commitments. These management decisions will allow the NPS to more adequately address increased visitation and will be sustainable even if visitation decreases.

2. Offer visitor services and opportunities that are consistent with park values and the NPS mission.

The visitor services and opportunities offered by the selected alternative are consistent with what Denali has offered in the past and are in keeping with the NPS mission of resource protection and visitor enjoyment. Under the selected alternative, visitors will have access to campgrounds, motorized sightseeing on the Park Road, trails in the entrance area, and non-motorized wilderness recreation throughout the park. These opportunities are offered at a scale that provides for visitor enjoyment and minimizes impacts to resources.

3. Preserve the special character of the winter and shoulder seasons in Denali, and the contrast that these seasons provide to the summer.

By facilitating visitor use and enjoyment of the park through non-motorized recreation as well as motorized access to the Park Road, the selected alternative will introduce more visitors to the relative quiet and solitude of these seasons without fundamentally altering the character of the winter and shoulder seasons or creating a winter and shoulder season visitor experience that is identical to the summer visitor experience.

4. Provide adequate and appropriate access to the park.

The selected alternative strikes a balance between providing visitor access and minimizing impacts from that access. Several components of the selected alternative will improve access to wilderness recreation, one of the reasons for establishment of the park. The Park Road will be managed under the selected alternative to provide access (e.g., allowing the road to open in the fall if weather conditions allow, plowing west of Headquarters during winter months) and protect park resources (e.g., winter plowing beginning in February rather than year-round, allowing bus service earlier in the spring).

5. Provide for diverse visitor skill levels, interests, and populations.

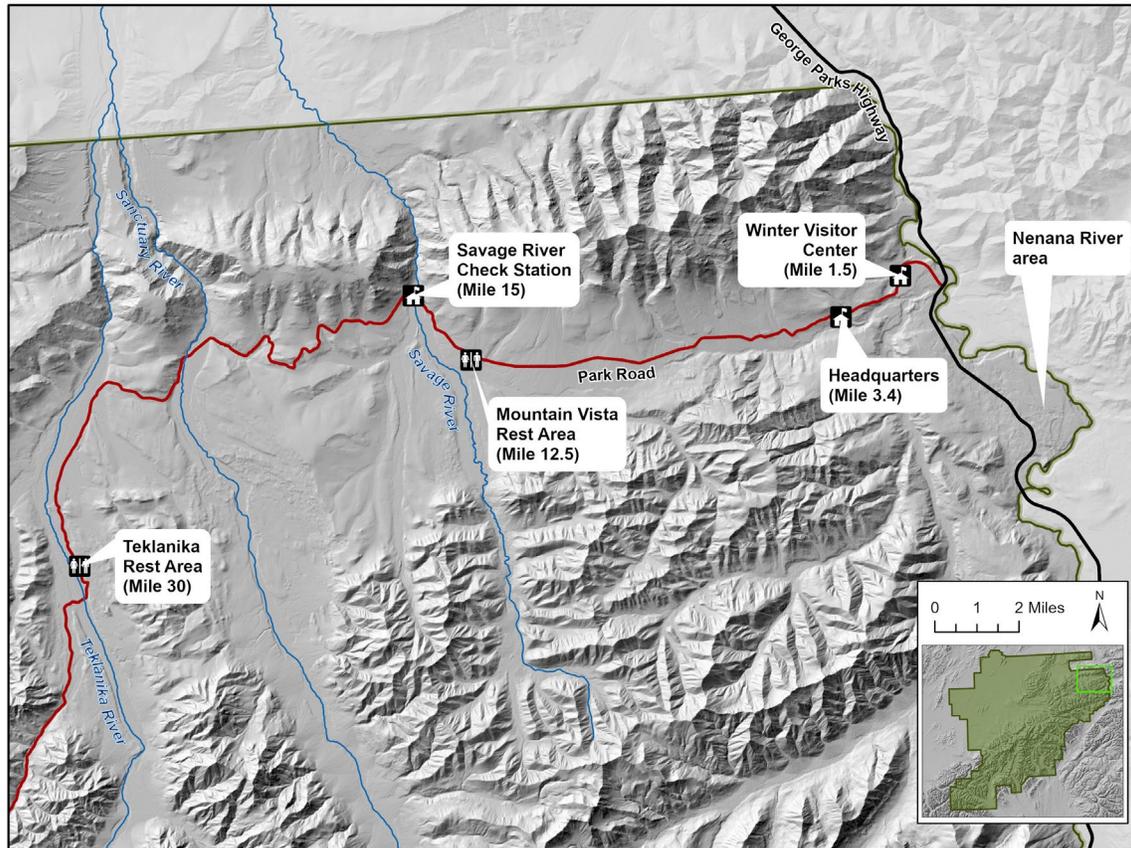
The selected alternative provides services and opportunities accessible to a wide diversity of visitor populations. Visitor opportunities span a spectrum including motorized sightseeing, groomed trail experiences, guided non-motorized recreation, and access to independent wilderness recreation.

The selected alternative also meets the objectives of concentrating development and services near the entrance area, fostering safety, and continuing visitor communication and education.

The other alternatives considered did not as effectively meet objectives. The No Action Alternative and Alternative 3 analyzed in the EA offered fewer visitor opportunities and a narrower range of visitor services, inadequately preparing Denali to welcome increasing and more diverse visitation. Alternative 4 was similar to the selected alternative, but proposed year-round plowing to Mountain Vista, which would extend the resource impacts from this activity into a time of year when it is more difficult for the NPS to provide this service, daylight is severely limited, weather conditions are typically unfavorable, and fewer visitors are present.

The rationale for the selected alternative is supported by monitoring that took place during five years (2014-2018) of a winter plowing trial period. These monitoring efforts indicate that plowing the Park Road west of Headquarters beginning in February did not introduce safety hazards and did not substantially impact wildlife. Other components of the selected alternative, including grooming trails in the entrance area, allowing roadside parking during the shoulder seasons, and use of a seasonal footbridge near Mountain Vista have occurred provisionally for at least several years without notable adverse impacts to visitors or park resources.

Figure 1. Location of winter and shoulder season visitor services in Denali National Park and Preserve



3. Public Involvement/Agency Consultation

The EA was preceded by the *2019 Winter and Shoulder Season Plan*, a non-NEPA document that outlines a vision for management of the winter and shoulder seasons in Denali. The public, governmental agencies, tribes, and other stakeholders had the opportunity to attend multiple public meetings and provide comments during the 2018-2019 creation of the plan.

A public review and comment period of the EA was open on the Planning, Environment, and Public Comment (PEPC) website from June 1 – June 30, 2020. The EA was available on PEPC and the public was invited to submit comments via mail or through PEPC. Press releases announcing the EA were mailed to media outlets, agencies, and other stakeholders. Posts linking users to the EA and to PEPC were shared on park social media accounts. An informational webinar was held on June 11, 2020 in lieu of an in-person meeting to meet national guidelines for public gatherings during the COVID-19 pandemic.

Consultation letters were sent to eighteen tribes, Alaska Native Claims Settlement Act corporations, native villages, and other organizations. The superintendent was not contacted by any of these corresponding parties regarding this EA. Park staff consulted with the State of Alaska ANILCA (Alaska National Interest Lands Conservation Act) office as well as the State Historic Preservation Officer, who concurred with the park's determination of "No Potential to Cause Effect."

Ten public submissions were received via PEPC and mail. The public comments did not change the conclusions of the EA about the environmental effects of the action but did offer substantive feedback, which is addressed in Appendix B of this FONSI.

4. Finding of No Significant Impact

As described in the EA, the selected alternative has the potential for adverse impacts to wildlife, soundscapes, and wilderness; however, no potential for significant adverse impacts was identified.

In general, the actions comprising the selected alternative would likely increase human activity and presence in the park during the winter and shoulder seasons. This could increase the possibility for human-wildlife interactions, cause physiological stress and additional energy expenditure for wildlife, and otherwise change wildlife behavior. However, wildlife in the area of Denali affected by the selected alternative, primarily along the Park Road corridor, are already familiar with human presence on the landscape, and the selected alternative does not introduce novel types of human activity which wildlife would not have encountered before. For example, monitoring (e.g., Toubman et al., 2015) during the first five years of winter plowing to Mountain Vista showed that wildlife reactions to vehicle traffic during winter months were similar to reactions demonstrated during summer months.

Wildlife impacts from the selected alternative are also expected to be of low intensity. Visitor numbers during the winter and shoulder seasons are currently low (approximately 3% of annual visitation) and will likely remain so relative to overall annual visitation under the selected alternative and other reasonably foreseeable actions. These low visitor numbers are concentrated geographically in a relatively small area of the park and temporally during the short daylight hours that exist during the bulk of the winter and shoulder seasons. These geographic and temporal constraints are not expected to change substantially under the selected alternative. Increases in human activity under the selected alternative (e.g., six additional weeks of road plowing on an additional nine miles of Park Road, occasional trail grooming in highway-adjacent areas, commercial guiding for non-motorized winter recreation) will not substantially change the nature of wildlife impacts or their intensity, and will not significantly impact wildlife resources.

Natural soundscapes will also be impacted by actions described in the selected alternative, as more noise will be introduced to the landscape during what are typically very quiet times of year. However, these temporary and occasional soundscape impacts from the selected alternative do not constitute significant impacts. The occasional and short-duration noise from trail grooming will not significantly increase impacts to the soundscapes of areas already impacted by highway, train, and other motorized noise. Vehicle noise from plowing and visitor traffic will also be occasional and

concentrated during daylight hours, leaving much of the soundscape intact and not significantly impacted. Noise produced by generator use in campgrounds during the shoulder seasons may or may not occur, depending on the extent to which visitors choose to use this equipment. Generator use may increase for a few hours each day for a few additional weeks each year and will not significantly impact the soundscapes of the park.

Installing a seasonal bridge near Mountain Vista and facilitating visitor access to wilderness recreation will impact park wilderness areas. The footbridge near Mountain Vista is an installation in wilderness and will adversely impact the undeveloped quality of wilderness character. However, this small wooden plank bridge will be in place only seasonally in an area of wilderness immediately adjacent to the Park Road, developed trails, campgrounds, and rest areas and will essentially not be visible to visitors except for those on the trail. This temporary, rustic footbridge will not significantly impact the wilderness character of the park or of the immediate area.

Other actions in the selected alternative will increase the accessibility of wilderness recreation during the winter and shoulder seasons by allowing for commercial guiding, shoulder season roadside parking, and vehicle access to the Park Road for a greater portion of the year. This may facilitate more people recreating in wilderness, which may decrease opportunities for solitude. However, providing opportunities for wilderness recreation is a fundamental value of Denali, and one of the reasons for establishing the park. Increased numbers of wilderness recreationists help fulfill this park purpose, and the recreational purpose of wilderness.

The extent necessary determination (Appendix B of the EA) that discusses commercially guided non-motorized winter recreation was conducted in accordance with the Wilderness Act and determined that commercial use is necessary in some areas of the park in order to protect wilderness character and fulfill the recreational purpose of wilderness in Denali. The extent necessary determination establishes limits on commercial use in wilderness and allows for commercial use only in areas of the park where it is necessary and appropriate to do so. The seasonal installation of a rustic footbridge and increased visitor access to wilderness recreation, including commercially guided non-motorized recreation, do not constitute significant adverse impacts to wilderness.

The selected alternative will not have significant impacts on cultural resources, air quality, floodplains, wetlands, paleontological resources, native grave sites, vegetation and soils, or Indian trust resources and sacred sites. This action complies with the National Historic Preservation Act. There are no threatened or endangered species in Denali National Park and Preserve, and this action complies with the Endangered Species Act. There will be no restriction of subsistence activities as documented by the ANILCA Section 810 subsistence analysis appended to the EA. There will be no significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

5. Conclusion

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (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 effort and, thus, will not be prepared.

Appendix A: Errata Indicating Text Changes to EA

This errata section provides clarifications, modifications, or additional information to the EA and to the selected alternative, Alternative 2: Varied Experiences. This appendix documents the following amendments to the existing EA and a revised EA will not be released.

Page 1, Proposed Action. Revise the seventh bullet point addressing concessioner transit and tour bus service to reflect a bus service start timeframe of early to mid-May as opposed to May 10. This is in recognition that the NPS may not be able to guarantee a specific start date for bus service each year but does intend to begin bus service earlier than at present. The revised seventh bullet point would be revised to read:

- *Allow concessioner transit and tour bus service starting early to mid-May*

Page 1, Proposed Action. Add a paragraph at the end of the proposed action bulleted list to clarify that that commercial guiding for non-motorized winter recreation in wilderness is addressed in an Extent Necessary Determination (END), and that if the proposed action is adopted, the decision document would act as an amendment to the *2006 Backcountry Management Plan*:

The analysis in the Extent Necessary Determination in Appendix B of this EA finds that commercial guiding for skiing, snowshoeing, and mushing is necessary in some areas of Denali to preserve wilderness character. If adopted by a finding of no significant impact, the proposed action would amend the 2006 Backcountry Management Plan by allowing for guided skiing and snowshoeing in management areas OP1 and Backcountry Hiker, and by prohibiting commercially guided skiing, snowshoeing, and mushing in management areas OP2 and D.

Page 4, Purpose and Need. Add a sentence to the objective of “provide adequate and appropriate access to the park” recognizing the recreational purposes for establishment of Denali:

Visitor enjoyment and access to wilderness recreational opportunities are among the foundational values of Denali.

Page 11, Alternative 2: Varied Experiences. Revise description of the winter plowing west of Headquarters to Mountain Vista to emphasize that plowing would begin as necessary to allow visitor access to Mountain Vista in mid to late February. The first sentence of the second paragraph on the page would be revised to read:

The road would be plowed west from Headquarters to Mountain Vista (approximately mile 12 of the Park Road) to allow for public vehicle access beginning in mid to late February.

Page 13, Alternative 2: Varied Experiences. As noted in errata entry for Page 1, Proposed Action, Alternative 2 is revised to reflect a bus service start timeframe of early to mid-May as opposed to May 10. This revision is carried forward throughout the EA. This is in recognition that the NPS may not be able to guarantee a specific start date for bus service each year but does intend to begin bus service earlier than at present. The revised first paragraph on Page 13 would read:

After the Park Road is opened west of Mountain Vista by spring road opening operations, typically in April, private vehicles would be allowed to drive to the Teklanika rest area until early to mid-May. Beginning in early to mid-May, tour buses and transit shuttle buses would operate to the Teklanika rest area, with the normal summer season and transit service west of Teklanika beginning around May 20. Buses operating outside of the allocation season (approximately Memorial Day – mid September) would be managed according to standards established in the 2012 Vehicle Management Plan.

Appendices Page 8, Extent Necessary Determination. Add a paragraph describing the relevance of the Alaska National Interest Lands Conservation Act (ANILCA) to law, policy, and planning guidance related to wilderness in Denali and the law's relevance to the END:

Alaska National Interest Lands Conservation Act (ANILCA)

The 1980 passage of ANILCA added roughly 4 million acres to the former Mount McKinley National Park and re-designated the enlarged NPS unit as Denali National Park and Preserve. ANILCA also formally designated 2.1 million acres of wilderness within Denali. Wilderness created in Alaska under ANILCA is managed differently than wilderness areas elsewhere, and ANILCA allows for uses in wilderness otherwise prohibited by the Wilderness Act. These uses include, among others, access by fixed-wing aircraft, use of snowmachines for traditional activities, and subsistence activities. Although these exceptions to the Wilderness Act contained in ANILCA are not directly relevant to the non-motorized winter recreation activities analyzed in this END, ANILCA provides important context and direction for wilderness management in Denali.

Appendices Page 13, Extent Necessary Determination. Add a sentence to recognize the particularly intact wilderness character of Denali:

Although Denali is bordered by other publicly accessible land that retains a high degree of wilderness character, wilderness areas in Denali and the recreational opportunities they afford have long been recognized as special and are part of the reason Denali was established as a national park.

Appendices Page 24, Extent Necessary Determination. Add a section to summarize and clarify how the conclusions of the END differ from those in the BCMP:

Summary of Changes to Guidance from the Backcountry Management Plan

This necessity analysis for non-motorized winter recreation activities reached conclusions that differ in some ways from those expressed in the BCMP. The changes to the BCMP that END authorizes are to allow for guided skiing and snowshoeing in management areas OP1 and Backcountry Hiker, and to prohibit guided skiing, snowshoeing, and mushing in management areas OP2 and D.

The following table indicates where the BCMP and END each allow for the three recreational activities addressed in the END, with ‘x’ denoting that the activity is allowed in that management area under each document. Where the BCMP and END differ, the BCMP is amended to reflect the conclusions of the END.

Management Area

| | A | | B | | C | | D | | OP1 | | OP2 | | Backcountry Hiker | |
|--------------------|------|-----|------|-----|------|-----|------|-----|------|-----|------|-----|-------------------|-----|
| | BCMP | END | BCMP | END |
| Skiing | x | x | x | x | x | x | x | | | x | | | | x |
| Snowshoeing | x | x | x | x | x | x | x | | | x | | | | x |
| Mushing | x | x | x | x | x | x | x | | x | x | x | | x | x |

Appendices Page 51, Glossary. Add a definition for the term “non-wilderness”:

Non-wilderness – Areas of the park that are neither eligible for wilderness nor designated as wilderness. These areas have generally been found to be ineligible for wilderness designation.

Appendix B: Response to Substantive Public Comments

A total of ten submissions were received during the public comment period for this EA. The summary below includes NPS responses to substantive comments shared in these submissions. Citations refer to documents in the references section of the EA.

What is the relationship between the 2019 Winter and Shoulder Season Plan and the 2020 Winter and Shoulder Season Visitor Services EA?

NPS Response:

The *2019 Winter and Shoulder Season Plan* is a conceptual non-NEPA document that outlines a vision for management of the winter and shoulder seasons in Denali. The 2019 Plan included public outreach but is not a decision document and it does not authorize the NPS to take any action or commit the NPS to follow through on any of the ideas discussed in the plan.

The *2020 Winter and Shoulder Season Visitor Services EA* is a NEPA document that draws on ideas explored in the 2019 Plan and along with the decision document authorizes the NPS to implement actions analyzed in the EA. The subset of topics from the 2019 Plan that are carried forward into the 2020 EA are those actions that the NPS can feasibly implement in the near future.

If in the future the NPS decides to implement additional ideas described in the 2019 Plan, additional NEPA analyses and compliance documents would likely need to be prepared.

Actions that the NPS has taken are spurring, rather than responding to, increased visitation.

NPS Response:

Visitation statistics indicate that increases in winter and shoulder season visitation to Denali began to accelerate beginning around 2012, predating any of the actions that the NPS has taken in recent years regarding winter and shoulder season visitor services (NPS, 2019e). Visitation rates across Alaska outside of Denali follow a similar pattern. Since 2009, October – April visitation to Alaska has generally increased each year, independent of changes to visitor services in Denali (Alaska Department of Commerce, 2018).

A critical component of the NPS mission is to provide for visitor enjoyment, and Denali in particular was established to provide wilderness recreation opportunities, among other purposes. Increasing and

changing visitation during a time of year that the park has not previously given a great deal of consideration demands a reevaluation of visitor services offered during these times of year. The *Winter and Shoulder Season Visitor Services EA* is such an evaluation and represents an NPS response to ongoing shifts in visitation patterns during these times of year.

The scope of the desired conditions should be limited to reflect the scope of most of the other actions contained in the preferred alternative which take place on the Park Road corridor.

NPS Response:

Most components of the proposed action concern the Park Road corridor from the entrance area to the Teklanika rest area because this is the area of the park where changes primarily need to occur to manage increasing and diversifying visitation and meet NPS objectives. The END addresses commercial use for non-motorized winter recreation across wilderness areas in the park for the reasons described in response to another comment below. The desired conditions address the entire park because they indicate where the NPS anticipates conditions may change (primarily the Park Road corridor from the entrance area to the Teklanika area) as well as areas where the NPS does not want conditions to change from their current state (most other areas of the park). Establishing the desired condition of essentially “no change” in these other areas of the park is an action and is hence included as an element of the proposed action and selected alternative.

Furthermore, the desired conditions related to areas of the park away from the entrance area to Teklanika corridor largely reiterate existing management guidance (i.e., establish a desired condition of “no change”) while acknowledging seasonal differences. For example, the Toklat area is quite busy and developed in the summer, but is to be treated as backcountry in the winter. These important seasonal differences are generally missing from existing management documents and are appropriate to address in an EA regarding the visitor experience of the winter and shoulder seasons.

The scope of the Extent Necessary Determination (END) should be limited to reflect the scope of most of the other actions contained in the preferred alternative which take place on the Park Road corridor.

NPS Response:

The END addresses commercial services for non-motorized winter recreation across wilderness areas in the park, whereas many components of the selected alternative focus on the entrance area and Park Road corridor. These differing geographic scales are necessary in order for the NPS to address components of the proposed action at the scale most appropriate to each element of the proposed action. There is no requirement that each element of a selected alternative relate to the same geographic area of the park. In the case of this EA, different geographic scopes are necessary to address different components of winter and shoulder season visitor services.

Commercial guiding in wilderness for non-motorized winter recreation is inherently related to visitor services, the subject matter of the EA, and is thus included as a topic in the EA. This commercial use is authorized to take place throughout the park by the *2006 Backcountry Management Plan* and is therefore likewise addressed at the parkwide level in the END. A holistic analysis of commercial guiding in wilderness requires a parkwide perspective. In particular, addressing commercial guiding for winter activities at a broad geographic scale is appropriate since long distances are often much easier to travel in winter months than during the summer.

The END is limited in scope in that it addresses only activities with a direct relationship to the subject matter of the EA (i.e., winter recreation). The END is activity-specific and does not address commercial guiding in wilderness for activities that take place at other times of year, nor does it address commercial guiding for all possible winter recreational activities. It addresses only non-motorized winter recreational activities as defined to include skiing, snowshoeing, and mushing. Commercial services for these activities are already authorized to some extent by the *2006 Backcountry Management Plan*. Addressing these activities at a parkwide scale limits the END to activities with direct relevance to the EA and ensures consistency with previous park management documents. Other elements of the selected alternative similarly involve the geographic scope most appropriate to each component.

The END should not apply to areas of the park that are only eligible for wilderness designation but are not formally designated as wilderness.

NPS Response:

The NPS is committed to preserving the wilderness character of areas that have been determined to be eligible for wilderness designation, as outlined in the *2006 NPS Management Policies*. ANILCA Section 1317(c) does not prohibit the agency from managing eligible wilderness according to a higher standard. NPS Management Policies Section 6.3.1 require the agency to preserve the wilderness character of eligible lands. The END is the most appropriate tool for managing commercial use in order to preserve wilderness character, as the NPS is required to do, in designated and eligible wilderness areas.

The END states that it amends the *2006 Backcountry Management Plan* (BCMP). The relationship between these two documents requires further explanation.

NPS Response:

Guidance regarding how the NPS may authorize commercial uses in wilderness has evolved since the BCMP was written. The conclusions reached in the END and adopted by this FONSI amend the BCMP.

Section 4(d)(5) of the Wilderness Act states that commercial services may be performed in wilderness only “to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.” Director’s Order 41 Section 7.3 further requires that authorizing commercial services in wilderness requires a “documented determination process” to establish if commercial services are necessary in wilderness and the minimum extent required for necessary commercial services.

The BCMP acts as the wilderness stewardship plan for Denali National Park and Preserve and addresses the types and extent of commercial services allowed in park wilderness areas, as required by the Wilderness Act. However, further guidance from Director’s Order 41 issued in 2013 and the 2012 ruling in *High Sierra Hikers Association v. U.S. Department of the Interior* indicate that a NEPA document such as the BCMP is inadequate to authorize commercial services in wilderness unless it includes a *specific* finding of necessity for those commercial services.

As required by the Wilderness Act, Director’s Order 41, and case law, the END included in the *Winter and Shoulder Season Visitor Services EA* acts as this specific finding of necessity for non-motorized winter recreation activities. Because the END addresses topics already addressed in the BCMP, the END, adopted by this FONSI, acts as an amendment to the BCMP. The public had the opportunity to review the END and provide feedback during the 30-day public comment period for the *Winter and Shoulder Season Visitor Services EA*.

Proposed actions should not occur until baseline data are collected against which impacts can be measured.

NPS Response:

Baseline data relevant to key resource issues affected by the selected alternative already exist and were used to inform the analysis of the EA. Populations of wolves, caribou, moose, Dall sheep, and bears, among other species, have been monitored for decades in Denali. These long-term studies describe trends in species distribution and population dynamics. As these studies are continued, they would reveal any substantial departures in these metrics from historic ranges of variability. These studies would likely not be able to detect changes specifically related to actions implemented under the selected alternative, however, as wildlife impacts from the selected alternative are expected to be localized and not to occur at the population level.

Soundscape monitoring likewise occurs throughout the park every year. Although monitoring occurs less frequently in winter and shoulder season months, a soundscape station was deployed during the winter of 2012 near the headwaters of Hines Creek with the specific intent of measuring baseline soundscape conditions prior to any winter plowing of the Park Road west of Headquarters (Betchkal, 2013). Monitoring at this and other soundscape stations has demonstrated that without the presence of motor vehicles winter months are very quiet, and the shoulder seasons represent transitional times of year between the silence of winter and the acoustic highs of summer. Together, soundscape

monitoring throughout the year provides the baseline against which the selected alternative was analyzed.

Wilderness character was analyzed and mapped across Denali in 2016 *Mapping Wilderness Character in Denali National Park and Preserve* final report (Burrows et al., 2016). This effort recognized the variation in wilderness impacts throughout the year, and specifically addressed winter wilderness character. This is in effect a baseline assessment of wilderness conditions in the park against which impacts to wilderness character from the selected alternative can be measured.

In addition to these efforts, the NPS undertook several studies specifically related to winter and shoulder season visitor use to inform the EA. During the first five years of a trial period of winter plowing west of Headquarters (beginning in 2014), NPS staff collected data regarding visitor use of the plowed section of Park Road and wildlife reactions to visitor vehicle traffic when in proximity to the road (e.g., Toubman, 2015). This study indicated that localized wildlife impacts from winter plowing west of Headquarters are similar to wildlife impacts from vehicle use of the park road during summer months. A companion study focused on the visitor experience in Denali during the late winter, and specifically focused on visitor expectations and desires regarding winter recreation opportunities and access to the Park Road during winter months (NPS, 2019d). During the spring of 2019, a similar study evaluated visitor demographics and preferences regarding the spring shoulder season, and also assessed visitor use of the Park Road during this season and wildlife impacts from that use (NPS, 2019b). Data collection focused on use of the Park Road during spring months is anticipated to continue in 2021. Each of these studies provide information related to winter and shoulder season visitor use and resource impacts that informed the analysis in the EA and provide a baseline against which the NPS can measure impacts stemming from full implementation of the selected alternative.

The EA does not adequately recognize the direction provided by ANILCA regarding access, allowable uses in wilderness, and recreation.

NPS Response:

The 1980 passage of ANILCA expanded and renamed what was then Mount McKinley National Park into the current Denali National Park and Preserve, and contained provisions regulating access and allowable uses in wilderness (e.g., airplane access, snowmachine use for traditional activities, subsistence use). These special provisions of ANILCA, which allow specific uses on park land and wilderness areas that would otherwise not be allowed, are not relevant to or affected by the proposed action, and are therefore not mentioned in the EA. If the NPS were to take action regarding use of mechanized transport in wilderness, airplane access, subsistence, snowmachine use for traditional activities, or other topics addressed by special provisions in the law, ANILCA would certainly provide the primary direction regarding what actions the NPS could consider taking.

Both the 1917 founding legislation for the park and ANILCA emphasize the importance of recreation, and wilderness recreation specifically, in Denali. The EA and the END are focused on

how the NPS can provide recreation opportunities and visitor services during the winter and shoulder seasons, and the documents repeatedly recognize the importance of wilderness recreation in the park. Both the EA and the END were developed with the intent of ensuring adequate and appropriate recreational opportunities are available to visitors throughout the year.

How can the EA allow administrative snowmachine use for trail grooming? The EA should consider non-motorized means for conducting trail grooming instead.

NPS Response:

Before beginning to conduct entrance area trail grooming in 2017, the NPS explored various options for non-motorized methods of trail grooming (e.g., having the park kennels or a skier use a tow-behind groomer). At the time, these methods were found to be impractical. If the NPS considers using non-motorized means of trail grooming in the future, that option is not precluded by the EA.

Per 36 CFR 2.18, snowmachine use is prohibited except where designated and when such use is consistent with park resource values. Although recreational snowmachine use is prohibited in the former Mount McKinley National Park (Old Park) areas of Denali, administrative use of snowmachines is allowed. The *Winter and Shoulder Season Visitor Services EA* establishes groomed trails in the entrance area and Nenana River area as a management objective and analyzes the resource impacts from this use. The conclusion of the analysis is that using snowmachines to groom trails in these areas would not significantly impact park resources, and thus such administrative use of snowmachines is an acceptable way to accomplish the management objective of providing groomed trail surfaces in these designated areas.

What is the relationship between winter plowing to Mountain Vista and the date at which the road opens to private vehicle traffic west of the Savage River? Has winter plowing resulted in earlier access to Teklanika in the spring?

NPS Response:

In the past 15 years, the Park Road has opened in the spring to Teklanika for private vehicle traffic as early as April 3 (in 2010) and as late as May 3 (in 2008). Since winter road plowing to Mountain Vista began in 2014, opening dates have ranged from April 8 (in 2016) to April 25 (in 2019).

Although winter road plowing to Mountain Vista allows the spring road opening effort to begin at Mountain Vista (mile 12.5) rather than Headquarters (mile 3), it has not had any consistent effect of hastening the opening of the Park Road to Teklanika. Snow and ice conditions remain the largest factor determining how quickly spring road opening progresses and the date at which private vehicles are allowed to Teklanika in the spring. The NPS does not intend to begin spring road opening efforts for public vehicle access earlier than has been typical in past years, either as a result of winter road plowing to Mountain Vista or otherwise.

The proposed action focuses too much on commercializing the park and should instead put limits on commercial activity in the park.

NPS Response:

The NPS acknowledges that there are strong and widely varying opinions regarding commercial use in Denali National Park and Preserve. The EA addressed commercial activity because commercial operators can be important providers of visitor services, the primary topic of the EA. The role of commercial operators in offering visitor services is in some ways emphasized in the winter and shoulder seasons, when NPS and other park partner staffing levels are typically lower and providing visitor services can be more difficult.

It is important to note that although the EA addressed commercial services, it does not require commercial entities to operate in the park. Among the largest changes to commercial services described in the EA are related to non-motorized winter activities. The END addresses activities in the park for which commercial services are already allowed (skiing, mushing, snowshoeing) under the *2006 Backcountry Management Plan*. The primary changes to these authorized commercial uses stemming from the END include the addition of guided skiing and snowshoeing in Management Area OP1 and the elimination of guided skiing, snowshoeing, and mushing from Management Areas OP2 and D. The END further articulates limits on this commercial use originally established in the *2006 Backcountry Management Plan*. In authorizing and describing limits on commercial services for non-motorized winter recreation the END in no way requires that such commercial services operate in the park.

Additionally, before any commercial service is allowed to operate in the park, further review and NEPA compliance would be required to ensure the commercial operation is consistent with park values, provides a rewarding visitor experience, and does not impair park resources. Commercial services as described in the EA that meet these requirements can be an effective means of providing for visitor enjoyment while protecting park resources and are therefore addressed in the EA focused on winter and shoulder season visitor services.

Visitor education should be a component of the proposed action.

NPS Response:

Visitor education and communication is a core component of the NPS mission and will continue under the selected alternative, as mentioned in the objectives outlined in the EA. During the winter and shoulder season planning effort resulting in the EA the NPS also developed a communication plan specific to the winter and shoulder seasons. This communication plan describes key messages and possible communication methods to educate and inform visitors as well as appropriately set visitor expectations for these seasons in the park. Internal messaging and outreach strategy documents such as the communication plan are not typically included in NEPA analyses, and so were

not included in the EA. The NPS maintains an emphasis on visitor communication and education regarding the winter and shoulder seasons.

The EA should address how the COVID-19 pandemic will affect winter and shoulder season visitor services.

NPS Response:

After the emergence of the COVID-19 pandemic in early 2020, the NPS specifically considered how visitor services and facilities could be provided safely in this dynamic situation. In the event that the pandemic is ongoing at the time of implementation of the selected alternative, any elements of the selected alternative which would pose a disease risk to visitors or NPS staff would be either modified or not implemented in accordance with Denali's pandemic planning. One of the objectives in the EA is to foster safety for visitors and NPS staff, and the NPS remains committed to safety during the pandemic.

In the event that longer-term changes to winter and shoulder season visitation are evident after the initial COVID-19 pandemic subsides (e.g., if travel or recreation habits change), the NPS would assess whether and to what extent components of the selected alternative should be implemented. The selected alternative is intended to provide visitor services that allow the NPS to respond to changing visitation in a sustainable manner. If visitation changes in unexpected ways due to COVID-19, the NPS will maintain a focus on sustainable and appropriate winter and shoulder season visitor services in the face of new realities. As of summer 2020, it is too soon to be certain whether such long-term shifts in visitation will occur as a result of COVID-19, and the NPS intends to implement the selected alternative or portions of it, consistent with this and other management documents, when it is safe to do so.

The EA should analyze the socioeconomic impact of the proposed action and alternatives, at least in general terms.

NPS Response:

Although it is true that elements of the selected alternative could affect socioeconomic conditions in the area surrounding the park, any analysis of the impacts that could occur and to what extent would be highly speculative as there is not enough information regarding this issue to meaningfully analyze. For example, during the 2014-2018 trial period of winter plowing west of Headquarters more businesses operated in the park during the winter, but beyond information regarding the revenue generated from this activity, there is no information available concerning broader social or economic implications. Any analysis of the differences in socioeconomic impact between the proposed action and alternatives would be particularly speculative, and such conjecture would not further the analysis, inform the public, or distinguish the alternatives from each other. The cumulative impacts

analysis discusses the proposed action and alternatives in the context of broader socioeconomic dynamics, and is the most appropriate place to address socioeconomics in this EA. The NPS has otherwise dismissed socioeconomics as an impact analysis topic due to the inability to meaningfully analyze this issue and the speculative nature of the connection between the proposed action and social or economic issues.

Vehicle use of the Park Road in the shoulder seasons, outside of the allocation season, should be monitored to ensure Vehicle Management Plan standards are met.

NPS Response:

Standards established in the *2012 Vehicle Management Plan* related to visitor experience and resource conditions technically only apply during the summer allocation season (the Saturday of Memorial Day weekend through the second Thursday following Labor Day or September 15, whichever comes first). However, the NPS intends to manage vehicle traffic on the Park Road throughout the year to minimize impacts to resources. To that end, monitoring of visitor traffic and resource impacts was conducted in the spring of 2019, and is anticipated to continue in 2021. These preliminary efforts will inform park managers as to whether further action affecting vehicle access to the Park Road in the spring may be needed beyond that contained in the proposed action (i.e., starting tour and transit bus service in early to mid-May), or if additional monitoring is warranted. The selected alternative recognizes that managing vehicle use of the Park Road to *Vehicle Management Plan* standards is one way to protect park resources and requires buses operating outside of the allocation season to meet these standards. Monitoring conducted in 2019, 2021, and in additional future years will help determine whether managing other vehicle traffic to the same standards is needed and will inform possible strategies for doing so.

Plowing during winter months west of Headquarters to Mountain Vista should be delayed until mid-March.

NPS Response:

Park visitation levels begin to increase from winter lows beginning around mid-February (NPS, 2019e). This also coincides with the rapid return of daylight to the area and weather patterns that are typically more stable and conducive to outdoor recreation. These reasons informed the decision to include plowing to Mountain Vista in mid-February in the selected alternative. Under the selected alternative, the NPS retains the option to begin plowing later than mid-February. The analysis in the EA establishes an earliest date at which the NPS will allow public access to Mountain Vista, and leaves open the possibility of later access if visitation or weather patterns change and plowing in February is no longer an effective visitor service. Five years of monitoring during the initial years of plowing to Mountain Vista in winter months did not indicate extensive resource impacts from that activity, and a two-year visitor study did indicate that the ability to drive to Mountain Vista during

late winter months was an experience valued by some visitors (NPS, 2019d). For these reasons, the NPS intends to continue plowing to Mountain Vista beginning in mid-February, but retains the option to begin plowing later.

Why doesn't the EA address the Spring trail?

NPS Response:

The Spring trail is a winter-only trail that extends from the park kennels to the Mountain Vista area. It was constructed following a 2003 EA for the primary purpose of providing backcountry access for park kennels patrols after spring road opening removes snow from the Park Road, which is otherwise the main access route for the kennels. Access for NPS patrols remains the primary purpose of the Spring trail, and it is not, therefore, a visitor service or facility and is not analyzed in the *Winter and Shoulder Season Visitor Services EA*.

Turning the Spring trail into a visitor destination was discussed during the process leading up to the *2019 Winter and Shoulder Season Plan*. However, the entire area surrounding the first few miles of the trail west of Headquarters frequently experiences severe issues with augeis and often becomes impassable to all but the most experienced winter recreationists. The NPS explored options for alternative trail alignments, but the poor conditions on the trail would likely not have improved with any alignment. Recreationists are still allowed to use the area, but the NPS determined that the Spring trail corridor is not a fitting location for a trail formally offered as a visitor opportunity and advertised as a maintained trail.

Park kennels staff continue to use the Spring trail when it is safe to do so. If both the Park Road and Spring trail are impassable, kennels staff can move dogs and equipment to Mountain Vista by vehicle and begin patrols from that location.

Is the intent for skiers and other pedestrians as well as mushers to be able to use the footbridge west of Mountain Vista?

NPS Response:

Yes, the footbridge west of Mountain Vista is intended to facilitate access to all recreationists. Allowing multiple user groups to use the bridge is not anticipated to create safety hazards as the bridge area, unlike the Mountain Vista rest area and Savage River campground, is not congested and does not have use levels as high as the trails in the immediate vicinity of the Mountain Vista rest area. The bridge will continue to be a rustic wooden plank as it has been in past years, but will be wide enough to accommodate typical dogsleds as well as skiers and other recreationists in single file.

The resource impacts from the Mountain Vista mushing access trail should be analyzed further.

NPS Response:

As described in the EA, creation of the mushing access trail would disturb approximately 0.3 acres of brush and other vegetation, including the removal of spruce trees from a portion of the total disturbed area. The trail would roughly parallel the Park Road and would be minimally visible from the Park Road and Savage River campground, as remaining vegetation would screen all but the trail entrance from view. The impact to park resources from disturbing 0.3 acres of this commonly occurring roadside vegetation in order to provide safe mushing access is small, and the NPS does not intend to analyze the impact beyond the level of analysis included in the EA.

Allowing roadside parking in the shoulder seasons degrades the visitor experience of the Park Road.

NPS Response:

The NPS has long recognized the importance of viewscales and the rustic feel of the Park Road in Denali. In order to protect these components of the visitor experience, the NPS issued restrictions on roadside parking in the 2018 Superintendent's Compendium. Those restrictions apply only during the summer season and are still in effect as of 2020. Restrictions on parking during the summer season protect the visitor experience of the Park Road and do not limit visitor access to backcountry areas, as a bus system operates during summer months and provides such access without the need for roadside parking.

In contrast, visitors in the shoulder seasons do not currently have transit buses or other means besides private vehicles for effectively accessing the Park Road or adjacent backcountry areas. In order to allow for shoulder season wilderness recreation in areas near the Park Road, visitors must be able to park in areas along the road. Such shoulder season roadside parking west of the Savage River will be managed under the following requirements as described in the EA:

- Vehicles must be parked in a manner that does not obstruct traffic or cause unsafe driving conditions for other vehicles. Areas that comply with this requirement include wide gravel pullouts that completely remove the parked vehicle from the two lanes of traffic, inactive driveways that do not have a no parking sign, and rest stop parking lots. Parking on the road shoulder such that the vehicle is still partially in the lane of travel is not allowed.
- Posted no parking signs or other instructions affecting vehicle access to the Denali Park Road must be obeyed.
- Overnight parking and/or parking for longer than 12 consecutive hours is allowed only when the above conditions are met, and the vehicle occupants have an active backcountry permit and are recreating in the backcountry.

- Additional restrictions or guidelines not described in this memo may apply to commercially operated vehicles, vehicles operating under ANILCA 1110(b) private property access rights, or vehicles operating under a special use permit.

This use has been allowed informally for many years under similar, though unofficial, guidelines. During such previous use in the shoulder seasons, no adverse impacts to resources or visitor experience have been observed. If alternate means of visitor access (e.g., a shuttle bus) are developed for the shoulder seasons, or if impacts from shoulder season roadside parking develop, additional restrictions or guidance could be implemented.

If the goal of the EA is to help the NPS prepare for and manage increased visitation, it should address a winter and shoulder season visitor center.

NPS Response:

The planning effort culminating in the *2019 Winter and Shoulder Season Plan* recognized that the current winter and shoulder season visitor center, the Murie Science and Learning Center, may not be adequate if winter and shoulder season visitation continues to increase. The 2019 Plan explored several concepts for an improved winter and shoulder season visitor center.

The NPS acknowledges that a winter and shoulder season visitor center is a need, however, any discussion involving frontcountry visitor facilities should take into account year-round use of the area, including other emerging needs focused on the summer season (e.g., backcountry permitting, concessioner and partner housing, concessioner-assigned facilities). Developing ideas for a winter and shoulder season visitor center in isolation from these other entrance area facility issues could lead to duplication of efforts, missed opportunities, and overall inefficient use of available space, time, and money.

A holistic entrance area visitor facility planning effort addressing year-round use is anticipated to begin in the near future and will include winter and shoulder season visitor center needs as a priority.

The EA focuses only on the adverse impacts to park resources from the proposed action and does not adequately address the recreational purposes of the park.

NPS Response:

The NPS recognizes the importance of recreation in the agency mission, and EA and the END are primarily focused on providing recreational opportunities and other visitor services during the winter and shoulder seasons to accomplish this mission. Although the impact analyses in the EA related to wildlife and soundscapes focus on the adverse impacts that recreation can have on these resources, the impact analyses regarding wilderness and visitor use and experience repeatedly acknowledge

wilderness recreation as a foundational park value and describe the beneficial impacts that the proposed action may have on wilderness recreation opportunities.

Why do road maintenance staff monitor aufeis west of Headquarters when a 2008 culvert project was meant to address the issue?

NPS Response:

Problems with aufeis on the Park Road from Headquarters to approximately mile seven have been an issue since the road was first constructed, and multiple efforts over the decades have attempted to address the problem. The latest effort in 2008 did help reduce the buildup of aufeis on the Park Road during the winter, however, it did not eliminate the problem. Aufeis monitoring and mitigation work is still necessary as a supplement to the 2008 culvert work.

Appendix C: Non-Impairment Determination

A determination of non-impairment is made for each of the park resource-related impact topics carried forward and analyzed in the environmental assessment for the selected alternative. The park's Foundation Statement 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, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Wildlife

Protection of wildlife populations and habitat was the original impetus for the establishment of what is now Denali National Park and Preserve. Management documents from establishing legislation in 1917 through the present continually reaffirm wildlife as a fundamental resource of the park.

Under the selected alternative, wildlife will likely be exposed to an increased amount of human activity which may cause changes in wildlife behavior, physiological stress, and other adverse impacts. These impacts to wildlife from the selected alternative are of the same nature as impacts from existing visitor use of the park, and the selected alternative would not introduce additional types of wildlife impacts that do not already exist in the park. Although these impacts would spread through a greater portion of the year under the selected alternative, wildlife in a relatively small portion of the park (primarily the road corridor from the entrance area to mile 30) would be affected by impacts that many species of wildlife are already habituated to (e.g., wilderness recreationists, vehicle traffic on the Park Road). Additionally, the intensity of visitation during the winter and shoulder seasons, and wildlife impacts stemming from visitor numbers and activity, is expected to stay low relative to summer visitation. Changing spring road access under the selected alternative by reducing the number of vehicles on the Park Road beginning early to mid-May may actually reduce wildlife impacts during the time of year when visitation levels and wildlife impacts stemming from winter and shoulder season visitation are at their highest.

In summary, the selected alternative would generate wildlife impacts that are typical in the developed road corridor, affecting relatively small portions of park wildlife populations at a low intensity. Impacts from the selected alternative would not result in impairment of wildlife resources in Denali National Park and Preserve.

Soundscape

The park's natural soundscape, and its contribution to visitor enjoyment and wilderness character, was formally documented in the *2006 Denali National Park and Preserve Backcountry Management Plan*. Currently, soundscapes in Denali are largely in their natural condition during the winter and shoulder seasons due to limited mechanized noise, visitation levels, and activity in the park. Increases in mechanized noise, visitation, and activity under the selected alternative will impact natural soundscapes in some areas of the park. However, because the actions under the selected alternative are concentrated in a relatively small area of the park, soundscapes in the vast majority of the park will remain unchanged during most of the year. Soundscape impacts under the selected alternative are also expected to be of lower intensity as compared to similar impacts during summer months (e.g., campground generator use, vehicle traffic on the Park Road). The winter and shoulder seasons will remain the quietest times of year under the selected alternative, and soundscapes will not be impaired.

Wilderness

Wilderness and wilderness recreation are among the park's fundamental resources and values as identified in Denali's Foundation Statement. Installation of a small seasonal footbridge near Mountain Vista will enhance safety and recreational access, but will also adversely impact the undeveloped quality of wilderness character. This impact is near the developed road corridor and is minute in the context of the nearly six million acres of designated or eligible wilderness in Denali.

Commercial guiding in wilderness and other actions in the selected alternative that will increase access to wilderness recreation may decrease opportunities for solitude, but will also facilitate wilderness recreation, a fundamental reason for the establishment of Denali. The levels of commercial guiding in the selected alternative were decided upon through an extent necessary determination in accordance with the Wilderness Act and were found necessary to preserve the wilderness character of Denali. Facilitating access to wilderness recreation through commercial guiding and other actions in the selected alternative helps fulfill the recreational purpose of wilderness, supports one of the fundamental values of the park, and does not impair wilderness resources.

Conclusion

In conclusion, as guided by the analysis presented in the EA, the best available science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the superintendent's professional judgment that the proposed action will not result in impacts to park resources and values that constitute impairment.