

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

**Denali National Park and Preserve**  
**Alaska**



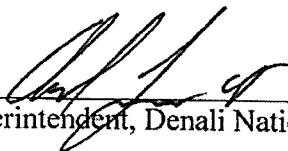

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**Finding of No Significant Impact**

**Concession Facilities Construction in the Entrance Area of Denali National Park**

**May 2011**

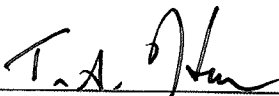
Recommended:

Superintendent, Denali National Park and Preserve

5/25/11  
Date

Approved:

  
ACRL Regional Director, Alaska

27 May 2011  
Date

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Concession Facilities Construction In the Entrance Area of Denali National Park Denali National Park and Preserve, Alaska May 2011**

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate impacts of constructing new buildings to replace inadequate concessioner facilities in Denali National Park, Alaska.

The NPS has selected Alternative 2 (the preferred alternative), Construct New Concessioner Facilities, with the mitigation measures. Under this alternative, the concessioner will construct a new Maintenance Shop, Recycle Shed, Commissary and Fitness Center. Parking for shop vehicles will be provided at the Maintenance Shop. The Concessioner Land Assignment (CLA) boundary will be expanded by approximately 0.43 acres.

Responses to public comments are found in Attachment A.

#### **ALTERNATIVES**

Two alternatives were evaluated in the EA.

##### **Alternative 1, No Action**

Under Alternative 1, a new Maintenance Shop, Commissary, Recycling Center, and Fitness Center would not be constructed. The functions related to these proposed structures would still be necessary, but would occur in the temporary, substandard spaces presently occupied. The existing concession maintenance facilities house the staff, equipment and tools to provide upkeep for concession-operated public facilities including sanitary restrooms and for the upkeep of staff housing ranging from dormitories to small cabins. The CLA boundary would remain unchanged.

##### **Alternative 2, Construct New Concessioner Facilities (Preferred Alternative)**

Under Alternative 2, a new 2,750 square foot (sf) Maintenance Shop building (for carpentry, plumbing, electrician) and 1,780 sf covered storage area will replace in entirety the current ATCO unit and trailer. Another 13,770 sf will be used for parking and vehicle circulation at the new shop site. Visibility screening for that facility will include the preservation of the natural buffer of 150 feet of forest, plus an enhanced buffer of salvaged trees placed into an abandoned adjacent roadbed, as those replanted trees gain maturity.

A new 2,500 sf Commissary building will support food and beverage services required of the concessioner. Another 3,000 sf will be used for a driveway and for indirect impacts from construction.

A new 1,800 sf concession employee Fitness Center will be constructed near the concession employee dorms.

A new 800 sf Recycling Center building will provide a centralized collection and processing facility for concessions and park materials. The Recycling Center is planned for the Maintenance Shop maintenance yard.

Any outdoor lighting at the new concession facilities will be kept to a minimum and will be fully shielded so that artificial light will not extend beyond the immediate work areas and will not extend upwards.

The total disturbance from constructing these new structures will be about 27,400 sf or about 0.6 acres. The CLA boundary will be expanded by approximately 0.43 acres.

## **PUBLIC INVOLVEMENT**

The EA was issued for public review and comment from April 22, 2011 to May 22, 2011. Paper copies of the EA, or notices of the EA's availability, were sent by mail or email to over 200 government agencies, interest groups, and individuals. The EA was posted on the NPS Planning, Environment, and Public Comment (PEPC) website and on the park's webpage. The park issued a press release about the availability of the EA and the open comment period on April 22, 2011. Three written comments were received. One comment from the State of Alaska was in favor of the project, one comment was against the project, though the commentor agreed that the present facilities are inadequate, and one comment questioned the efficiency gains to be had.

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

## **DECISION**

The NPS decision is to select Alternative 2, Construct New Concessioner Facilities, along with the mitigating measures.

### **Mitigating Measures**

The following mitigation measures apply to the selected Alternative 2, Construct New Concessioner Facilities

#### Vegetation

Construction limits will be marked at all work areas to help insure that vegetation outside the construction zone does not get trampled or torn up during the work. Disturbed areas will be monitored for exotic plants.

### Wildlife and Habitat

The NPS will follow established guidelines in the park's bear-human conflict management plan. The plan requires contractors and staff to use bear-proof containers for food and refuse and sets up guidelines for temporary closures. Vegetation clearing will be done outside of the May 1 to August 1 nesting season, or after an inspection by the park's raptor biologist, so as to not impact nesting or fledging. Any occupied nests discovered will be protected at all times.

### Cultural Resources

Surveys for cultural resources have taken place in the road corridor over the past two decades. If previously unknown cultural resources are located during construction, the project will be halted in the discovery area until cultural resource staff can determine the significance of the finding.

### Visitor Use and Recreation

Any outdoor lighting at the new concession facilities will be kept to a minimum and will be fully shielded so that artificial light will not extend beyond the immediate work areas and will be "Night Sky Friendly".

### **Rationale for the Decision**

The selected action (Alternative 2) will satisfy the purpose and need of the project better than other alternatives. Providing a maintenance facility (yard and shop) comparable to the maintenance facility used by NPS crews at C Camp will substantially improve the concessioner's ability over the next twenty years or more to maintain park-owned assets, including visitor facilities, buildings, campgrounds, food service areas and public restrooms. Moving the concession maintenance functions outside the bus barn area will reduce non-bus related vehicular and pedestrian traffic in the bus barn parking area, thus increasing the safety environment for the bus mechanics walking between the bus barn and the buses that need maintenance. This action will also modernize and make more efficient the maintenance, food storage, and recycle functions of the concessioner, and will aggregate concessioner employee fitness equipment in a central location near the employee dorms and bath house.

Alternative 1 (No Action) will not accomplish the purpose and need of the project. Maintenance of the concessioner facilities will remain inefficient, with sub-standard facilities and storage for the plumber, carpenters, and electrician scattered in dilapidated structures originally used for seasonal housing. The sub-standard facilities of the concessioner will continue to negatively impact their ability to adequately and professionally manage their assigned buildings, including the Morino Grill, Alaska Geographic Bookstore, the Wilderness Access Center, Riley Creek Mercantile and Employee Dining Room. Likewise, the preparation area and storage area for the variety of food services provided by the concessioner in the Morino Grill, Employee Dining Building, and for Tour bus box lunches will continue to be scattered in old housing units which are unsuited for this purpose, this making these functions inefficient and more expensive.

The concessionaire's ability to collect and handle recyclables such as beverage containers, cardboard and paper is limited, and they rely on infrastructure at other properties outside the park immediately adjacent to the Entrance Area. If a new company is awarded the NPS concession contract, once the existing contract is up for renewal, the concessionaire will not be able to properly handle recyclables and will send them to a landfill instead.

Employee fitness equipment is currently scattered in dining and snack structures, which causes a conflict between those wanting to work out with those having a meal.

### **Significance Criteria**

The selected alternative (Alternative 2) will not have a significant effect on the human environment. This conclusion is based on the following examination the significance criteria defined in 40 CFR Section 1508.27.

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

The EA evaluated the effects of Alternative 2 on vegetation and soils, wetlands and riparian areas, wildlife, soundscape, air quality, night sky darkness, cultural resources, visitor use and enjoyment, and park management. As documented in the EA alternative 2 will have a minor effect on the area's natural resources and no effect on the park's cultural resources while having a minor beneficial effect on park operations by providing modern permanent facilities for concessioner support functions. There will be no restriction of subsistence uses.

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

The selected alternative will have a limited impact on public health and safety because the areas involved are assigned to the use of the concessioner and not to the public. Moving the concession maintenance functions outside the bus barn area, however, will reduce non-bus related vehicular traffic in the bus barn parking area, thus increasing the safety environment for the bus mechanics walking between the bus barn and the buses that need maintenance.

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

The facility construction will be located in a national park. However, the purpose of this particular zoned area, the CLA, includes concessioner facilities that support visitor services, such as bus parking and maintenance, employee housing and dining, and facility maintenance.

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

The effects on the quality of the human environment will not be controversial. The NPS sent the EA to over 200 agencies, organizations, and individuals for public review. Only three comment letters were received. The environmental analysis concluded that the proposed facility construction will have no more than negligible to minor adverse impacts on park resources. The commentors did not question these findings.

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

The environmental effects of the selected alternative (Alternative 2) do not involve unique or unknown risks.

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

The new concessioner facilities are a logical outgrowth of the responsibilities that have been placed on the park concessioner through the concession contract to maintain visitor services facilities for an increasing number of visitors. Some concessioner functions have had new facilities replacing old ones in the last 30 years, such as the bus barn and employee dorms and bathhouse. Other functions, such as the ones related to the facilities approved here, need to be modernized and expanded to keep up with expanding responsibilities.

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

The EA evaluated construction of new facilities to house certain concessioner functions.. The conceptual outline for this work was evaluated in various public documents, including the 1997 *Entrance Area and Road Corridor Development Concept Plan/Environmental Impact Statement*, and the 2001 *Environmental Assessment for Construction of New Visitor Facilities in the Entrance Area of Denali National Park*, where the work was rated as less than a significant impact.

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

The selected alternative will not adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places. A total of nine cultural resources have been identified within 0.25 miles of the proposed construction sites, but none will be affected by any of the proposed construction.

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

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

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

The selected alternative (Alternative 2) will not violate any Federal, State, or local law.

## **FINDINGS**

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

The selected alternative complies with the NPS Organic Act and ANILCA. There will be no restriction of subsistence activities as documented by the ANILCA, Section 810(a) Summary Evaluation and Findings.

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

## **ATTACHMENT A**

### **NPS RESPONSES TO PUBLIC COMMENTS for the Denali National Park and Preserve EA for Concession Facilities Construction in the Entrance Area of Denali National Park**

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

1. Comment #1. Individual: How is the project funded and will only the concessioner profit from the increased efficiency?

NPS Response #1: The proposed project is to be funded with Concession Franchise Fee (CFF) funds, that is, funds that are a percentage of net revenue and that are paid by the concessionaire to the National Park Service as called for in the terms of the ten year contract between the NPS and the concessionaire. The CFF funds can be used to construct new facilities related to the concessioner operation, replace or upgrade existing concessioner facilities, or support research related to visitor use. Other recent projects funded by CFF money include paving the third loop at the Riley Creek Campground, rehabilitating the Teklanika Campground water system, upgrading the underground utilities in the Concession Land Assignment and applying dust palliative to the park road. We believe that this infrastructure investment will attract more competition for the new contract which will be let in 2015.

2. Comment #2. Individual: At \$1.6 million, the Maintenance Shop will cost too much.

NPS Response #2: We do not agree. Construction during the short season in the interior of Alaska is expensive. The budgeted cost for the Maintenance Shop was reviewed and approved by the NPS Development Advisory Board, consisting of NPS officials and Board Members from other agencies and the private sector. Part of the documentation submitted for DAB approval included a comparison of the proposed building's cost (\$357 per sf) and other, similar buildings, including the Ketchikan Shipyard Maintenance Shop (\$357 /sf), Alaska Rail Road C Maintenance Shop (\$432 /sf) and Pacific High School Vo-Tec Center in Sitka (\$384 /sf).

3. Comment #3. Individual: It appears that the staging area for equipment set up is already in place before the public comment period is over.

NPS Response #3: Work for the new Maintenance Shop has not begun. A staging area for a separate contract - to upgrade the underground utilities in the Concession Land Assignment - has been roped off.



4. Comment #4. Having the new maintenance shop vehicle use close to the high bus traffic area between the park road and the bus parking area creates a potential safety hazard.

NPS Response #3: We agree that there is a concentration of vehicular use - from the park road buses to a few electric carts used by the maintenance staff - in the area of the bus barn, dispatch office, and proposed maintenance shop. As was said in the EA, this project will increase safety for bus mechanics by moving the maintenance vehicle use out of the bus barn parking lot. We will emphasize to the concessioner that all users should be alert to the new traffic patterns that will result from this action.