

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

**Klondike Gold Rush National  
Historical Park**  
**Alaska**



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**Finding of No Significant Impact**

**Canyon City Loop Trail Project**

**September 2015**

Recommended: \_\_\_\_\_

Superintendent, Klondike Gold Rush National Historical Park

9/21/15

Date

Approved: \_\_\_\_\_

Regional Director, Alaska

9/29/2015

Date

## **FINDING OF NO SIGNIFICANT IMPACT**

### **Canyon City Loop Trail Project**

#### **Klondike Gold Rush National Historical Park, Alaska**

**September 2015**

The National Park Service (NPS) proposes the *Canyon City Loop Trail Project* to protect, interpret, and connect visitors with both the natural and cultural resources of the historic Canyon City town site.

The NPS evaluated two alternatives in the environmental assessment: a no action alternative and the proposed action alternative. Alternative 2, Construct a  $\frac{3}{4}$  mile Loop Trail with Interpretive Signage, has been selected as described below.

### **ALTERNATIVES**

The two alternatives evaluated in the environmental assessment included:

#### **Alternative 1 – Existing Conditions (No Action Alternative)**

Under the No Action Alternative, the existing Canyon City town site trail would remain in place. Brushing and maintenance would continue along this section. No additional interpretive signage would be added. Other features within the historic Canyon City area would be allowed to naturally decay and be reclaimed into the environment. The historic trail would continue to be overgrown by succession of the surrounding forest.

#### **Alternative 2 – Construct a $\frac{3}{4}$ Mile Loop Trail with Interpretive Signage (Selected Alternative)**

The loop trail will start at the terminus of the existing Canyon City trail (at the DKT boiler) and will continue to the southwest to the bank of the Nourse River, then progress back to the east where it will connect with the historic wagon road from Dyea and turn north to merge with the original trail and the bridge across the Taiya to the Chilkoot Trail (Map 1).

The expected total footprint of the new trail will be 0.18 acres (7,874 square feet). The proposed trail will be 2 feet wide, 3,937 feet long, and constructed of locally procured gravel. At most 50 cubic yards of gravel will be needed for this project (3,937 feet long, 2 feet wide, 2 inches deep). Gravel will be taken from borrow pits. Up to twelve (12) borrow pits will be established for this purpose. The pits are estimated to range in size from 1 to 15 cubic yards. Gravel will be removed with hand and motorized equipment throughout the project.

Up to 16 stone steps down a steep traverse and a stone causeway up to 200 feet long will be built. The causeway will consist of a stone border to hold and elevate the gravel trail tread in place. The stair section will be the same width as other trail sections; the causeway will be up to

2 feet wider to keep the gravel tread width at 2 feet. Causeway sections will primarily be located where the trail passes through an intermittent slough or low area.

Signage will consist of up to ten (10), 24x36 inch panels detailing the history of the site and small (8x8 inch) trail signs as needed for natural and cultural feature identification. All signs will be consistent in design with other interpretive signs along the Chilkoot Trail.

Several sections of social trail will be rehabilitated. These sections are less than 200 feet long and vary from 1-3 feet wide. Vegetation mat removed from the new trail sections will be retained and placed over the social trails.

Work will be carried out by NPS trail crew staff and is estimated to take eight weeks. The trail will be constructed with both hand and motorized equipment. Work will begin in the fall of 2015 with the majority of work occurring during the summer of 2016.

### **Public Comments**

The Environmental Assessment was open for public review and comment July 23, 2015 through August 21, 2015. It was posted the NPS Planning, Environment and Public Comment (PEPC) website at <http://parkplanning.nps.gov/projectHome.cfm?projectID=59534>. Two public comments were received, one from the National Parks Conservation Association and one from a private individual. Both supported the action alternative and neither raised any questions or substantive concerns not already addressed in the Environmental Assessment. The National Parks Conservation Association noted the importance of resource protection and enhanced visitor experience: "We agree that building this trail will enhance visitor's understanding and enjoyment of this unique period of American history. We appreciate that great care will be taken not to damage any cultural or natural resources, and that construction methods and visitor education will be employed to reduce the risk of introducing invasive species to this area."

### **Consultation with the State Historic Preservation Office (SHPO)**

SHPO was briefed on this project during a meeting at their offices in Anchorage on February 2, 2015. The National Park Service sent a letter requesting concurrence with a finding of no adverse effect on August 26, 2015. SHPO concurrence was received September 17, 2015.

In the 2015 field season, KLGO archeologists completed survey and testing compliance for section 106 of the NHPA. Intensive pedestrian survey and 45 shovel tests were completed over roughly 1200 meters of proposed trail. No features or artifacts were discovered during the survey and all shovel tests were negative for cultural deposits and artifacts.

### **Consultation with Native Tribal Governments**

The National Park Service consulted with the Skagway Traditional Council in July 2015 at the beginning of the public review period and again on August 25, 2015. The Traditional Council supported the project as outlined in Alternative 2.

## **DECISION**

The NPS decision is to select Alternative 2 as described above (Construct a  $\frac{3}{4}$  mile Loop Trail with Interpretive Signage (NPS Preferred)) along with the following mitigating measures.

## **MITIGATION MEASURES**

Mitigation measures are specific actions that when implemented reduce impacts, protect park resources, and protect visitors. The following mitigation measures will be implemented with the Canyon City Loop Trail Project:

The trail crew will employ sustainable design and best building practices to the proposed loop trail including limited structure installation, alignment to maintain natural sheet flow and overflow patterns of the site, no hardened surfaces, and re-contouring and vegetation of impacted areas (social trails) to a more natural condition.

All borrow pits will be located outside of wetlands and their location will be field checked with a cultural resource specialist prior to installation to ensure that no cultural resources are located in their footprints or affected by their creation. Borrow pit sites will be strategically located to completely avoid impact on the surrounding cultural resources. Borrow pits will be re-vegetated after use by backfilling with organics from the trail corridor.

In accordance with the USFWS timing guidelines recommended for the protection of migratory birds; vegetation clearing, site preparation, or other construction activities that may result in the destruction of active bird nests will not be undertaken during the nesting season, April 15 through July 15. If any active nest is encountered at any time, it will be protected from destruction. "Active" is indicated by intact eggs, live chicks, or presence of an adult on the nest. Eggs, chicks, or adults of wild birds will not be destroyed.

Several small rock trail structures are planned for this section of trail. Throughout the process great care will be taken to not disturb any of the existing cobble alignments that remain from the gold rush.

Boot brushes would be installed at the trailhead along with an interpretive sign about invasives and at Sheep Camp to encourage hikers to remove dirt that may be carrying invasive plant seeds before continuing on the trail.

## **Rational for Decision**

The selected action (Alternative 2, Construct a  $\frac{3}{4}$  mile Loop Trail with Interpretive Signage) will satisfy the purpose and need of the project better than the other alternative because it will best meet the stated goals:

1. Interpretive signage and more interaction with historical artifacts will improve visitor experience and connection with natural and cultural resources.

2. Reducing the usage of social trails will prevent the degradation of natural and cultural resources.

Providing a well-defined trail will improve visitor safety by reducing the likelihood of disorientation in the search for artifacts.

The Chilkoot Trail is a National Historic Landmark and a Cultural Landscape and Canyon City is a contributing feature to the Chilkoot Trail. This project will help exhibit these resources to visitors and create a greater sense of place and connection to the experiences of the individuals who participated in the 1898 Klondike Gold Rush.

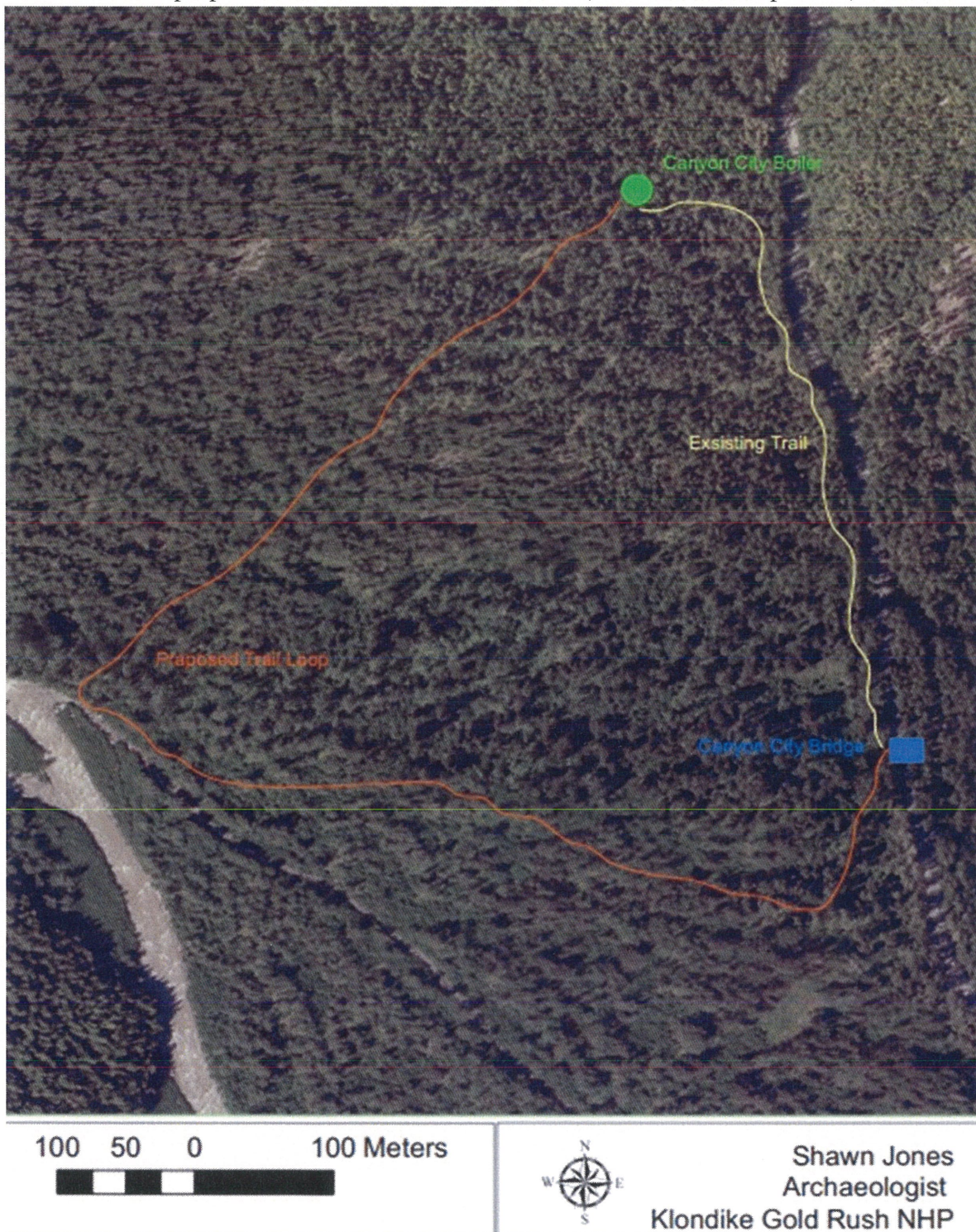
Unplanned social trails located at the Boiler and radiating out from the ambiguous end of the current trail are actively damaging the existing cultural resources. The Canyon City loop trail project will develop a formal trail continuing past the historic Townsite, which will reduce social trail traffic exploring the terminus of the historic Townsite trail and minimize foot traffic damage to the resources.

The construction of the loop trail and associated revegetation of social trails will mitigate the risk of disorientation. The longest search for missing persons within Klondike Gold Rush National Historical Park occurred in the historic town site area. Individuals were following social trails looking for artifacts and became disoriented, resulting in three days lost without food or shelter.

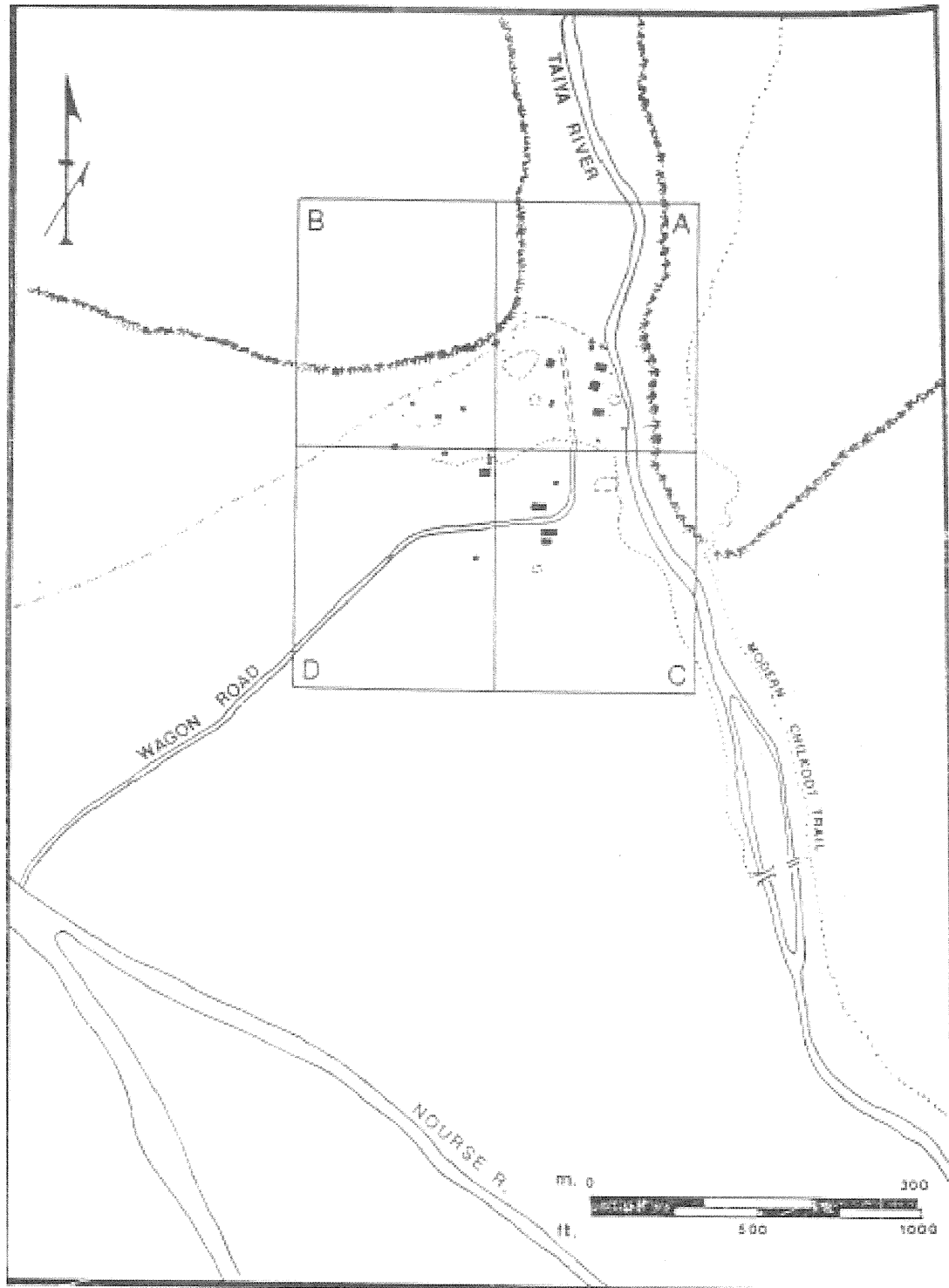
The development of a loop trail will not introduce any structural changes that will have an effect on the floodplain and natural resources associated with it. The elimination and natural revegetation of the social trail network will result in a net improvement of natural site conditions.



Map 1 - Overview of the project area. The slough is seen heading east just south of where the proposed trail meets the Nourse River (NPS ArcGIS Map, 2015).



Map 2 - Overview of Canyon City showing the four areas inventoried (Carley 1981:76, her figure 11).



## Significance Criteria

The preferred alternative (Alternative 2) will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria as 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 shows that Alternative 2 will have negligible to minor beneficial impacts to visual resources, vegetation, wildlife, soils, wetlands and riparian areas, soundscape, and cultural resources, including the cultural landscape.

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

The project will improve safety since a clearly defined loop trail in conjunction with the revegetation of social trails will help prevent visitor disorientation.

Visitors with the physical acumen to reach the active floodplain are assumed to be able to hike the approximately one quarter mile to higher ground in the event of a flood.

*(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 Chilkoot Trail is a National Historic Landmark and a Cultural landscape and Canyon City is a contributing feature to the Chilkoot Trail. This project will help exhibit these resources to visitors and create a greater sense of place and connection to the experiences of the individuals who participated in the 1898 Klondike Gold Rush.

None of the land cover types that are being disturbed are classified as sensitive or threatened. At most 0.04 acres of wetland will be affected by trail construction. Trail construction will have a negligible effect on the flood retention, habitat and other values received from wetlands.

*(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 are not controversial. The EA was distributed to over 50 agencies, organizations, and individuals during a 30 day public comment period in July and August 2015. The NPS received two comments, both of which were supportive of the purpose and need to make improvements in the area. The environmental analysis concluded that alternative 2 will have moderately beneficial effects to the quality of the human environment.



*(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) have no identified 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 selected alternative does not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration.

*(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.*

Under Alternative 2 (the Proposed Action), there are no past, present, or reasonably foreseeable future actions whose effects, when combined with the effects of this action, result in cumulative effects.

*(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 (Alternative 2) will have negligible to minor beneficial impacts for sites, structures and objects listed in or eligible for listing on the Natural Register of Historic Places that may be affected by development activities, such as the boiler and nearby ruins and artifacts.

*(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.*

No Threatened and Endangered species or associated habitat(s) have been documented within the project area.

*(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) does not violate any Federal, State, or local law.

## **FINDINGS**

The level of impacts to visual resources, vegetation, wildlife, soils, wetlands and riparian areas, soundscape, and cultural resources anticipated from implementing Alternative two will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the integrity of the park.

The selected alternative complies with the NPS Organic Act, the Alaska National Interest Lands Conservation Act, and the park's *General Management Plan*. There will be no restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

The National Park Service 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 Canyon City Loop Trail Project and Environmental Assessment in Klondike Gold Rush National Historical Park**

The NPS has read and considered all comments received on the Canyon City Loop Trail Project and Environmental Assessment. A substantive comment is defined as one which leads the NPS to: (1) modify an alternative, including the proposed action; (2) develop and evaluate an alternative not previously given serious consideration; (3) supplement, improve, or modify the environmental analysis; or (4) make factual corrections. The NPS is also required to provide an explanation when substantive comments do not warrant further agency response (CEQ NEPA Regulations 1503.4).

The NPS received two comments on the plan. Both supported the action alternative and neither raised any questions or concerns not already addressed in the Environmental Assessment. As such, they do not meet the standards of a substantive comment as defined immediately above.

## ATTACHMENT B

### ERRATA

An errata section provides clarifications, modifications or additional information to the EA. The modifications here do not significantly change the analysis of the EA and, therefore a new or revised EA is not needed and will not be produced. These modifications are based on public comments and additional agency review of the plan and environmental assessment.

1. **Modification** to page 7: “sections of social trail of which would be rehabilitated.” changed to “sections of social trail which would be rehabilitated.”
2. **Addition** to page 10: “.” was added after “Bird Treaty Act”
3. **Modification** to page 13: “installed at the trailhead along with an interpretive sign about invasives and at Sheep Camp to encourage hikers to remove dirt that may be carrying invasive plant seeds before continuing on the trail.” changed to “installed at the trailhead and at Sheep Camp along with interpretive signage encouraging hikers to remove dirt that may be carrying invasive plant seeds before continuing on the trail.”
4. **Modification** to page 13: “An identification chart of KLGO's invasive plants with contact info the natural resources office was also distributed to all KLGO staff this summer and would be placed in all Chilkoot trail warming huts to aid with identification and reporting of invasive plants detected by hikers.” changed to “An identification chart of KLGO's invasive plants with contact info for the natural resources office was also distributed to all KLGO staff this summer and was placed in all Chilkoot trail warming huts to aid with identification and reporting of invasive plants detected by hikers.”
5. **Modification** to page 18: “The under-story between the proposed trail and higher ground is thinner in many places than on the Chilkoot Trail. Visitation to KLGO averages nearly a million people annually of who approximately 3,000 hike the 33-mile Chilkoot Trail. Canyon City is the preferred camp for families and visitors who do not want to undertake the entire Chilkoot Trail and providing additional recreational opportunities in this area would greatly increase the visitor experience.” changed to “The under-story between the proposed trail and higher ground is thinner than many other places on the Chilkoot Trail. Visitation to KLGO averages nearly a million people annually of which approximately 3,000 hike the 33-mile Chilkoot Trail. Canyon City is the preferred camp for families and visitors who do not want to undertake the entire Chilkoot Trail, and providing additional recreational opportunities in this area would greatly increase the visitor experience.”
6. **Addition** to page 32, after final paragraph “**Summary of Findings.** Intensive pedestrian survey and 45 shovel tests were completed over roughly 1200 meters of proposed trail. No features or artifacts were discovered during the survey and all shovel tests were negative for cultural deposits and artifacts. Soil deposition in the southern portion of the canyon displayed poorly formed soils with shallow deposits extending in most cases to only 30 centimeters in depth before reaching impassible large cobbles and parent material. This is most likely due to a severe glacial outburst flood pre gold rush which stripped much of the flora and sediment from the canyon floor accompanied by periodic flooding from the Norse and Taiya Rivers leading to continued soil disturbance. Roughly 300 meters in the northern portion of the survey displayed more intact sedimentary deposits extending to depths of 60-70 centimeters before reaching impassible large

cobbles and parent material. However these shovel tests also displayed no cultural deposits or artifacts. The historic road from the Canyon City Townsite to the Norse River was apparent and visible in some sections and indiscernible in others. This is also most likely due to periodic flooding from the Norse and Taiya Rivers leading to disturbance of the intact feature in these indiscernible areas. The proposed trail loop has been successfully routed around all intact features, structures, and cultural deposits; and upon determination if the historic road between the Townsite and the Norse can be distinguished, will also be routed around these areas to assure that there are no adverse effects on any remaining portions of the feature.”

## ATTACHMENT C

### Determination of Non-Impairment Canyon City Loop Trail Project

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

A determination of non-impairment is made for each of the resource impact topics carried forward and analyzed in the environmental assessment for the selected alternative (Alternative 2). The description of park significance in the first part of the plan was used as a basis for determining if a resource is:

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

Impairment determinations are not provided for visitor experience or socioeconomics because impairment determinations relate back to park resources and values. These impact topics are not considered to be park resources or values subject to the non-impairment standard.

### Soils

Up to twelve (12) borrow pits will be located throughout the project site. These will be cleared by on-site archeologists prior to or during construction and will not be located in wetlands. The disturbed areas will be re-vegetated with vegetation mats and filled with organics from the tread profile. Due to the thin organic layer (1-2cm thick) found throughout the proposed footprint of the new trail there will be very minimal ground disturbance along the length of the trail.

The Canyon City Loop Trail occurs within a floodplain on a peninsula of land between the Nourse and Taiya Rivers. On site investigations have displayed no signs of flooding in the area of the proposed trail despite having the 3rd highest recorded water level in the lower Taiya in 2014. The majority of the proposed construction area of the loop trail is 100 feet above the current riverbanks. One section of trail approaches within 300-500 feet of the rivers is located on or near the active floodplain and the area likely to be affected by outburst flooding and by normal floods with longer recurrence intervals. The distance to higher ground is similar to other



locations along the Chilkoot Trail south of Canyon City at about a quarter mile. The development of the loop trail will not have a substantive effect on erosion, sediment deposition, and channel adjustment.

Overall, the impacts to soils from the implementation of Alternative 2 will not result in impairment of these resources.

### **Wildlife and Vegetation**

There may be temporary displacement of wildlife due to noise and human activities during the brushing and construction phases of the project. Brushing will occur after July 15 in accordance with the (MBTA) and individual trees will be surveyed for bird nests. When the project is finished human activity will return to low levels and wildlife patterns should return to normal. Bears and other mega fauna currently use the Chilkoot Trail and this additional piece of trail is not expected to have a significant impact on wildlife behavior or use of the area. The increase in human use will have a minimal effect on the wildlife as there is already a trail in the vicinity and may even result in positive outcome for wildlife as the presence of social trails is eliminated. As the project area is not a boreal toad breeding site the project will have a minimal to no impact on toads.

According to the Klondike Gold Rush National Historical Park: Landcover Classes and Plant Associations Report, “none of the plant associations known or thought to occur in Klondike Gold Rush NHP have been formally ranked as rare (with rarity defined as a conservation status of G1 or G2, S1 or S2), and although the range and extent of provisional plant associations is not completely known, it is thought that most of these associations occur commonly outside of the Park and that their distribution is relatively secure,” (Flagstad and Boucher 2015:27). The rehabilitation of several existing social trails in the project area will have minor beneficial effects on the forest type as a whole.

The spur trail has been inventoried for invasive species and, to date, none have been found. The development of the loop trail will not increase the variety or quantity of invasive species in the park due to planned mitigation measures, including installation of a boot brush at the Chilkoot trailhead. Boot brushes will be installed at the trailhead and at Sheep Camp along with interpretive signage about invasives to encourage hikers to remove dirt that may be carrying invasive plant seeds before continuing on the trail. Large hand pulling efforts (by staff, service groups and community events) have focused in the Dyea area for many previous years and have aimed to protect the native species in that area as well as to prevent those invasive species from migrating up the Chilkoot Trail corridor.

Overall, the impacts to wildlife and vegetation from the implementation of Alternative 2 will not result in impairment of these resources.

### **Visual Resources and Soundscapes**

The primary change resulting from the preferred alternative will be the visual impact of the removal of vegetation and establishment of a trail tread through the historic town site and

glacial outwash plain. The proposed trail will traverse the same corridor as the historic wagon road from 1898, taking advantage of viewpoints of the historic wagon road wherever possible, and preserving historic features. There will be minor short-term noise disturbance from chain saws, aircraft, and construction crews during the brushing and construction phases. The noise will continue at varying levels for a maximum total of eight weeks. There will be no long-term noise impacts from the project beyond normal operations in the Park.

Overall, the impacts to visual resources and soundscapes from the implementation Alternative 2 will not result in impairment of these resources.

### **Cultural Resources**

The Chilkoot Trail is a National Historic Landmark and a Cultural landscape and Canyon City is a contributing feature to the Chilkoot Trail.

No adverse impacts are expected to cultural resources as the trail has been designed with respect to archeological surveys conducted over the past 30 years (Map 2). In the 2015 field season, NPS archeologists completed an intensive pedestrian survey and 45 shovel tests over roughly 1200 meters of the proposed trail. No features or artifacts were discovered during the survey and all shovel tests were negative for cultural deposits and artifacts.

The historical landscape will be enhanced by the construction of a trail near a portion of a Gold Rush era trail alignment. It will also remove human traffic over the archaeological features of historic Canyon City by eliminating the social trails that currently run human traffic over those features.

The impacts to cultural landscapes and cultural resources from the implementation Alternative 2 will not result in impairment of these resources.

### **SUMMARY**

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