

FINDING OF NO SIGNIFICANT IMPACT

For Construction of a Springtime Dogsled and Skiing Trail from Headquarters to Mile 7 of the Park Road Denali National Park and Preserve

The National Park Service (NPS) has prepared an environmental assessment (EA) that evaluates the construction of a Springtime Dogsled/Ski trail (Spring Trail) in the vicinity of the park road from park headquarters at mile 3.4 to mile 7.63 in Denali National Park and Preserve. The trail will be approximately 4 1/4 miles long and 8 feet wide and will be built to accommodate over snow travel by skiers, snowshoers, and private and concessioner sled dog teams during the late winter/early spring. Trees and shrubs will be cleared from the route, but little ground disturbance will be required. Most of the trail will be built in designated wilderness.

The purpose of the trail will be to provide a late winter/early spring route through the taiga west of park headquarters. A trail for winter backcountry recreation is needed in this area because the present trail is the park road, and road snow and ice removal operations have to begin early enough in the spring so that the gravel roadbed is dried out for the main season of visitor use. The road is often unavailable for skiing for up to four weeks during the most popular time to pursue snow recreation. No matter how the park road snow and ice removal is managed, a quality backcountry recreation experience is not maintained during those times when the heavy equipment is working on the road.

In above average snow years the proposed trail may be usable earlier in the winter, but under normal snow conditions the snow might not be deep enough to protect the underlying soils and vegetation until January or February. In addition to creating a permanent wilderness recreational opportunity, the Spring Trail will also provide a loop opportunity in combination with the park road until the time that plowing closes the road for skiing.

Evaluation of this trail is not contained in the 1997 Entrance Area and Road Corridor Development Concept Plan/Environmental Impact Statement (DCP/EIS). Frontcountry developments that would improve visitor opportunities along the first 15 miles of the park road, however, were established as a general concept in the DCP/EIS, and this included some trails reaching into nearby designated wilderness.

In the NPS **Preferred alternative** the proposed Spring Trail will parallel the park road for 4 1/4 miles from Park Headquarters to mile 7.63, with all but one mile in designated wilderness. Curves in the trail will be broad and sweeping to provide adequate sight distance and passing width for dog teams as well as cross-country skiers and snowshoers. The alignment will minimize steep grades and cross slopes and will minimize problems with *aufeis*.

Trail construction work will be limited to brushing and clearing an eight-foot wide corridor, and cutting the tops off the largest tussocks to level the trail as necessary. Work will be undertaken in winter after the surface of the ground is frozen. Tussocks will be cut using grub hoes and pulaskis and the cut material will be moved to fill the low spots. Brush and trees will be cut with motorized brush cutters, chainsaws, handsaws and polesaws. The use of those mechanized/motorized tools was

approved in a project-specific minimum requirement analysis. Brush will be scattered out of sight and firewood-size wood will be stacked near the trail and hauled by dog sled during the winter to Park Headquarters or to ranger patrol cabins.

Temporary wooden plank bridges will be used at the three creek crossings until there is adequate snow and ice to cover the floodplain boulders. No borrow material will be needed for the construction, and no revegetation work will be part of the plan. The trail will not be signed or mapped for summer use.

Of the 4 ¼ miles of trail, approximately 3 miles will follow previous clearing work, although the full length will need to be brought to the 8 foot wide standard.

The trailhead for visitors will be at the parking area used by the Dog Demonstration buses in the summer.

Alternatives

In the **No-Action alternative** skiing and dog-mushing from headquarters west would continue to be primarily on the snow-covered surface of the park road. The wide road allows for safe passing of dog teams, maintenance of a track for conventional skiing, and room for using snow-plow skiing as a braking method.

Once road-plowing operations are in full swing in March, a snow route would not be available through the forest until the plowing operations pass through to the open tundra toward the Savage Campground. During an average year an *aufeis* area just beyond headquarters can take up to three weeks of heavy equipment work to open up, and the road is often unavailable for either skiing or for driving on for up to four weeks. Skiers can leave from headquarters and wind around through the forest on side hills, but these exploratory routes are unsafe for novice use because of trees and other obstacles requiring sharp turns at high speeds on downhill sections.

Environmentally Preferred Alternative

Alternative 1 (No Action) is identified as the Environmentally Preferred Alternative because it affects wildlife and vegetation the least. The No Action alternative, however, would not provide a recreational facility during the time of year when skiing and dog mushing are most popular.

Public Involvement

A 36-day public review of the EA was conducted from November 26, 2002 to December 31, 2002. The press release announcing the EA was mailed to local media and the EA was posted on the park's web site and was mailed to 20 agencies, organizations, and individuals. One telephone response and four comment letters were received on the EA. Three commenters fully supported the preferred alternative. One commenter suggested additional actions to support winter recreation in the park, such as plowing the road to the Savage River all winter. This topic is beyond the scope of the present EA and is to be evaluated in the draft Backcountry Management Plan due later this winter.

Two commenters were opposed to the construction of a Spring Trail. One field biologist was adamant that all dogs should be eliminated from the park due to the potential for transmitting diseases to the resident wolf population, and was opposed to the proposed trail because it would further sled dog use in the park. The NPS has no evidence that the use of dog teams in the park, dating back to at least 1905, and likely earlier, has had a direct link to any wolf deaths. The NPS will seek suggestions for research to evaluate this possibility.

Another commenter raised four objections: (1) The trail would be found and used by hikers in the summer. The NPS believes that the trail will be hard to notice in the summer, will provide access to no particular destination, and that summer use would be discouraging due to the wetlands crossed; (2) The trail would increase pressure to plow the road earlier. The NPS believes that having a Spring Trail is a good idea on its own merits. A full discussion of how to plow the park road will be addressed in the draft Backcountry Management Plan due to the public in late winter, 2003; (3) Pieces of skiing trails already exist and are sufficient for backcountry users. The NPS believes that the new Spring Trail should take advantage of any existing paths but that no trail presently exists that is complete and functional for both skiers and dog mushers and for a range of users, including beginners; (4) The trail clearing work should be done when the ground is thawed. The NPS believes that the work should be done when the ground is frozen so that the construction worker foot traffic will not disturb the structure of the wetland soils or organic layer.

Mitigation and Monitoring

Mitigation to be taken in conjunction with implementing the NPS preferred alternative includes:

- Clearing for the trail will take place during the winter to lessen impacts to underlying wetlands and to disturb the park experience of fewer visitors due to the use of power tools in the designated wilderness.
- Power tools used for the project will be limited to those identified in the minimum requirement/minimum tool finding, i.e., motorized brush cutters and chainsaws.
- Clearing for the trail will not require disturbance to the mineral soil.
- The wooden planks used for three temporary bridges will be stored in the forest above the 100-year floodplain.
- No borrow material will be used for the construction.
- No revegetation work will be part of the plan.
- The trail will not be signed or mapped for summer use.
- Trail maintenance will be limited to brush cutting.
- If concealed cultural resources are encountered during the project, work will not proceed until the Superintendent has been notified.

Environmental Consequences of the NPS Preferred Alternative

The NPS has determined that the preferred alternative can be implemented with no significant adverse effect to the natural or cultural resources as documented by the EA and briefly summarized below.

Vegetation, Soils and Wetlands. About 50 to 80 mature spruce trees will be removed for the trail. White spruce community types are common on many of the slopes within miles of park

headquarters and this limited permanent vegetation removal will not affect the functioning of these types. No rare plant species have been found in the project area.

No mineral soil will be disturbed under the alternative, although minor disturbance to the organic layer will occur when cutting the tops of some sedge tussocks and placing those in low spots.

The impact of limited brush removal will be minimal and reversible to the short stretches of palustrine scrub shrub wetlands along the trail.

2. Wildlife/Habitat. Clearing the trail will not significantly alter or remove large mammal habitat.

Use of the trail in the spring will create new opportunities for interactions between dogteams, skiers, and moose, but the scattered willows along the trail will neither attract significant moose use nor hamper escape by moose should they hear a dog team or skier approach. Predators will not gain more than a minor advantage from this trail.

Habitat contiguous to and surrounding the trail is available to small mammals displaced by trail snow compaction. The small size of the zone of disturbance compared to the amount of surrounding undisturbed habitat limits the severity of this impact.

No known raptor nest trees will be cut down.

3. Floodplains. The wooden plank bridges used to span the floodplains of three tributaries of Hines Creek will not block the flows nor change other hydraulic characteristics of the streams.

4. Cultural Resources. An archeological investigation in September, 2001 revealed no archeological resources on the trail route. No disturbance to the mineral soil is anticipated from the project and no impact to archeological resources is expected.

5. Wilderness Resource Values. Trail construction will have only a short term impact on wilderness resources and likely will not affect anyone's wilderness experience because the project will happen when the road will be closed at park headquarters, the days are short, and when there are few park visitors.

Development of this trail in designated wilderness will slightly diminish the opportunities to experience an untouched landscape.

The short-term increase in motor noise from chainsaws and other small engine brush cutters will have minimal, short-term impact on wilderness values.

6. Recreation and Visitor Use. The proposed trail will beneficially affect park users by making available an over-the-snow forest trail opportunity. With a Spring Trail available, the usual March road closure for snow and ice removal will not preclude users from having a practicable route from park headquarters into the interior of the park. During the time that the ski trail on the park road is available, it could be combined with the Spring Trail to make a loop facility.

Adverse impacts to visitors during construction of the trail will be minimal because visitation in mid-winter is limited, with few people moving around in the forest because of the colder temperatures, shorter days and unpredictable weather.

7. Park Management. Two relevant general planning concepts in the 1997 DCP/EIS are to enhance visitor opportunities along the first 15 miles of the park road and to better define trails at heavily used locations along the park road corridor. A defined trail through the white spruce forest environment west of park headquarters will provide an ideal opportunity for providing a visitor recreation opportunity through the entrance/HQ area taiga to the tundra in the interior of the park for the whole winter - including the popular springtime. A park management goal to construct facilities as accessible as possible, within the limits of topography and other factors, will be met. The alignment chosen will allow as wide a range of users as possible to use the topography in the area.

The proposed spring trail will not conflict with the "no formal trails" policy in the park GMP because: 1) the policy is primarily aimed at hiking use; 2) the policy is primarily aimed at use in the tundra; and 3) following a drainage (in this case Hines Creek) is not feasible because it will be too steep, narrow, and icy,

Decision

The National Park Service's decision is to select the NPS preferred alternative. The decision includes mitigation measures on trail construction, use and maintenance as identified in the FONSI.

Rationale for the Decision

The NPS preferred alternative is chosen because it best meets the objective of improved facilities for wilderness recreation opportunities, and does so with minimal impacts to park resources. The use of the park road near headquarters in the spring for skiing and dog mushing is difficult because of the need to get the road ready for summer vehicular traffic. The plowing bottleneck caused by the *aufeis* at mile 4 must be dealt with early, before the rest of the road can be readied for summer use, and winter recreation on the road must take a back seat to this operation. The no-action alternative does not support an improvement in wilderness recreation opportunities at the most popular time of year for winter recreation activities.

This preferred alternative is consistent with the 1986 Park General Management Plan, the 1997 Entrance Area and Road Corridor Development Concept Plan/EIS, and National Park Service Management Policies.

Adverse impacts such as temporary use of mechanized equipment in designated wilderness, removal of trees and tall shrubs from an 8-foot wide swath of forest land and use of a new wilderness skiing and dog mushing trail will be temporary and/or minor in effect. These impacts will not result in an impairment of park natural resources fulfilling specific purposes identified in legislation establishing the park or key to the natural or cultural integrity of the park and will not violate the NPS Organic Act.

The preferred alternative complies with the Endangered Species Act and the National Historic Preservation Act. There will be no significant restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

I find that the proposed action 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 the regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared.

Recommended: Paul R. Anderson
Superintendent, Denali National Park and Preserve

2/7/03
Date

Approved: Marcia Blaszyk
Acting Regional Director, Alaska Region

2/13/03
Date