



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

**Arches National Park**  
**Utah**

**FINDING OF NO SIGNIFICANT IMPACT**  
**VISITOR CENTER CONNECTOR TRAIL**

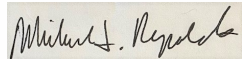
Recommended:

**Kayci Cook Collins**  
Superintendent, Arches National Park

4/6/2020  
Date

Approved:



**Mike Reynolds**  
Regional Director, National Park Service Regional Office  
Serving Department of Interior Regions 6, 7, and 8

5/13/20  
Date

## **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 the proposed project to allow bicycle use on the Arches National Park Visitor Center Connector Trail. The project is needed to address safety issues for bicycles and vehicles along the park entrance road.

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.

## **SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION**

Based on the analysis presented in the EA, NPS selected the Proposed Action Alternative – Allow bicycle use on the Visitor Center Connector Trail (the NPS preferred alternative).

The selected alternative will allow for (non-motorized or non-electric assisted) bicycle use on the newly constructed Visitor Center Connector Trail. In response to comments received, the EA was revised to include additional analysis of potential user conflicts (conflicts between pedestrian users and traditional bicycle users are not anticipated).

As part of the selected alternative, a new sign will be installed where the Moab Canyon Pathway intersects with the Arches entrance road to direct bicyclists to the Visitor Center Connector Trail. Bicyclists will be encouraged to use the Visitor Center Connector Trail rather than the entrance road to enter the park. Pedestrian access will continue to be allowed. No bike-specific maintenance, rehabilitation or armoring will be necessary to upgrade the trail to sustainable condition. The following safety measures will be taken to prevent or minimize pedestrian-bicyclist conflicts along the trail: installation of signage about sharing the trail. Life cycle maintenance costs related to allowing bicycle use along the trail are estimated to be in the range of \$500 to \$1,500 annually.

### **Rationale**

The Proposed Action Alternative was selected because it will improve access for bicyclists and provide long-term beneficial impacts to bicyclists' safety and experience in the Arches National Park entrance area.

## **MITIGATION MEASURES**

All mitigation measures are already incorporated as part of the selected action; there are no additional mitigation measures integral to the selected action.

## **PUBLIC INVOLVEMENT/AGENCY CONSULTATION**

The EA was available for public review and comment during a 30-day period, from January 13, 2020 through February 11, 2020. During that review period, 53 pieces of correspondence were received from the public through the PEPC website and coded into 61 total comments. Six comments were substantive. Substantive comments presented new alternatives or alternative

elements or suggested changes that caused revisions to the proposal. Substantive comments are addressed in the Errata and Response to Public Comments.

## **FINDING OF NO SIGNIFICANT IMPACT**

CEQ regulations at 40 CFR Section 1508.27 identify ten criteria for determining whether the Selected Action will have a significant effect on the human environment. The NPS reviewed each of these criteria given the environmental impacts described in the EA and determined there will be no significant direct, indirect, or cumulative impacts under any of the criteria.

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 adversely affect any endangered or threatened species or its habitat or violate any federal, state, or local environmental protection law.

Implementing the selected alternative will not have adverse impacts on any historic structures, districts, sites, highways or objects listed in or eligible for National Register of Historic Places.

The only impact topic retained for detailed analysis was bicyclists' safety and experience in the entrance area. The total cumulative impact on bicyclists' safety and experience in the entrance area would be beneficial and long-term and would negate the adverse impacts that are already occurring.

## **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 project and, thus, will not be prepared.

# Non-Impairment Determination

## Background

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the National Park Service (NPS) to manage units “to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 U.S.C. 100101). An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, Section 1.4.5).

Whenever NPS actions require preparation of an environmental assessment (EA) or environmental impact statement (EIS) pursuant to the National Environmental Policy Act (NEPA), the NPS must also complete a “non-impairment determination” that states in writing that the action selected in a finding of no significant impact (FONSI) or record of decision (ROD) will not result in impairment to park resources or values.

Section 1.4.6 of NPS *Management Policies 2006* identifies several park resources and values that are subject to evaluation in a non-impairment determination. However, per the subsequent September 2011 NPS *Guidance for Non-Impairment Determinations and the NPS NEPA Process*, a non-impairment determination does not need to include discussion of impacts to visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard.

## Non-Impairment Determination for the Visitor Center Connector Trail EA

This non-impairment determination has been prepared for the selected alternative, as described in the FONSI for the Visitor Center Connector Trail Environmental Assessment (EA).

One impact topic was carried forward for detailed analysis in the EA: bicyclists’ safety and experience in the entrance area. As noted above, non-impairment determinations are not necessary for this impact topic. All other potential impact topics were dismissed from analysis in the EA, because they were found to have no potential for significant adverse impacts; therefore, no other impact topics are subject to a non-impairment determination.

In conclusion, it is the Superintendent’s professional judgment that implementation of the selected alternative will not constitute an impairment of the resources or values of Arches National Park.

**ERRATA**  
Visitor Center Connector Trail  
Environmental Assessment

Arches National Park  
March 2020

**ERRATA**

These Errata are to be attached to the Visitor Center Connector Trail EA dated March 2020 and are intended to correct or clarify statements in the EA other than typographical and minor editorial errors and to address substantive comments on the EA that were received during the public review period.

**Part 2: Alternatives**

Page 3, paragraph 4, lines 2-5 – the following text has been revised based on comments received during the public review period: “Under the Proposed Action Alternative, the Visitor Center Connector Trail would be open for non-motorized or non-electric assisted bicycle use.”

Page 4, paragraph 1, lines 2-4 – the following text has been added based on comments received during the public review period: “Where appropriate, the Park will post information about the Visitor Center Connector Trail and trail etiquette for a shared use path on the Arches website.”

**Part 3: Affected Environment and Environmental Consequences**

Page 5, paragraph 5, line 8 - the following text has been added: “and visitors alike.”

Page 5, between paragraphs 5 and 6 – the following paragraph has been added based on comments received during the public review period:

“Pedestrian use on the Visitor Center Connector Trail is likely to be very low due to the distance (2.5 miles) to the Arches Visitor Center from the Moab Canyon Pathway trail hub at Lions Park and the very low numbers of pedestrians who currently enter Arches by way of the entrance road (fewer than 100 per year). Conflicts between pedestrian and bicycle users and corresponding risks to pedestrian safety on the shared use path are not anticipated; however, if conflicts or safety concerns arise, the Park will consider adopting mitigating strategies such as dividing the path into lanes for pedestrian vs. bicycle use.”

## Response to Public Comments

The EA was released for public review from January 13, 2020, through February 11, 2020. In response to the EA, 53 correspondences were received. All correspondences will be maintained in the project decision file. The 53 correspondences were coded into 61 comments. A comment is a portion of text within a correspondence that addresses a single subject or issue. Comments were coded into groupings centered on a common subject. Comment summaries presented in this document combine those similar comments.

Response to public comments addresses substantive comments that were received during the public review period. Substantive comments are those that: “1) question, with reasonable basis, the accuracy of the information in the NEPA document; 2) question, with reasonable basis, the adequacy of the environmental analysis; 3) present reasonable alternatives other than those presented in the NEPA document; or 4) cause changes or revisions in the proposal.” Four comments were substantive and suggested changes that caused slight revisions to the proposal.

57 comments were not substantive. These comments expressed support or opposition to the NPS preferred alternative, shared opinions or personal experiences, had operational questions or suggestions, or were outside of the project scope.

The four substantive public comments and responses are summarized as follows.

**COMMENT SUMMARY:** Two commenters stated that the EA failed to mention e-bikes and questioned whether e-bike use would be allowed on the Visitor Center Connector Trail.

**RESPONSE:** The Visitor Center Connector Trail connects an existing paved bicycle path (Moab Canyon Pathway) with the Arches visitor center. The Moab Canyon Pathway is designated a non-motorized pathway and it crosses three jurisdictions outside the park (City of Moab, Grand County, and Bureau of Land Management). All three jurisdictions prohibit the use of e-bikes (or any motorized or electric-assisted bicycles) on the pathway. The City of Moab Municipal Code 12.20.005 defines motor assisted bicycles (electric, gas or diesel) as “motorized vehicles.” Grand County Ordinance 10.07.040 prohibits operation of Electric Assisted Bicycles on trails designated for non-motorized use. The Bureau of Land Management built the trail using a non-motorized fund source and designated it for non-motorized use only under its NEPA process. To be consistent with the other three jurisdictions and understanding the Arches Visitor Center Connector Trail connects with and is only accessible by the non-motorized Moab Canyon Pathway, NPS has determined that e-bikes will be prohibited on the Visitor Center Connector Trail.

**COMMENT SUMMARY:** Two commenters suggested additional mitigation measures (such as signs about trail etiquette and dividing the path for walkers vs. bikers) to address potential conflicts between pedestrian and bicycle users on the Visitor Center Connector Trail and risks to pedestrians.

**RESPONSE:** Pedestrian use on the Visitor Center Connector Trail is likely to be very low due to the distance (2.5 miles) to the Arches Visitor Center from the Moab Canyon Pathway trail hub at Lions Park and due to the very low numbers of pedestrians who currently enter Arches by way of the entrance road (fewer than 100 per year). Conflicts between pedestrian and bicycle users and corresponding risks to pedestrian safety on the shared use path are not anticipated;

however, if conflicts or safety concerns arise, the Park will consider adopting mitigating strategies such as dividing the path into lanes for pedestrian vs. bicycle use. This language was added to the Affected Environment and Environmental Consequences section of the EA.