



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

**Lake Clark National Park and Preserve
Interior Region 11 – Alaska**

**FINDING OF NO SIGNIFICANT IMPACT
VISITOR CONTACT STATION TO TANALIAN TRAIL SYSTEM
PEDESTRIAN ACCESS TRAIL**

Recommended:

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Date

Approved:

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Regional Director, Interior Region 11 – Alaska, National Park Service

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 the proposed project to develop the Tanalian Trail System Pedestrian Access Trail in Lake Clark National Park and Preserve (LACL, the park), Lake and Peninsula Burrough, Alaska.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA (NPS 2022a), Response to Comments (Appendix A), Non-Impairment Determination and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

Two alternatives were analyzed in the EA: 1) the No Action Alternative, where pedestrian access to the Visitor Contact Station and trail system would continue to require use of community roads and existing trails with easements through private lands; and 2.) the Proposed Action Alternative, and NPS Preferred Alternative to construct a pedestrian access trail from the Visitor Contact Station to Tanalian Trail System. This will improve accessibility by providing pedestrian only access from the NPS Visitor Contact Station to the Tanalian Trail System that includes Tanalian Mountain, Tanalian Falls, and Kontrashibuna Lake on a trail occupying NPS lands.

This FONSI is available on the NPS Planning, Environment, and Public Comment (PEPC) website at: <https://parkplanning.nps.gov/VCAccessTrail>.

2. Selected Alternative and Rationale for the Decision

The Authorized Officer, Regional Director of the Alaska Region, NPS has decided to implement the Proposed Action as described in the EA (NPS 2022a, p. 5) to construct a pedestrian access trail from the NPS Visitor Contact Station to the Tanalian Trail System on NPS lands. The selected alternative is based on consideration of impacts to recreation and visitor use and safety, resources, wilderness, consultation with tribes and Alaska Native Claims Settlement Act Corporations (ANSCA), the State Historic Preservation Office (SHPO), and review public comments.

The selected alternative provides for construction of up to 0.6 miles of new trail and widening 0.3 miles of the Ridge Trail on NPS lands. The proposed trail tread will be 5-foot wide with a 2-foot-wide brushed area on each side removing undergrowth to facilitate hiking (total width of 9 feet). Approximately 30 inches of soil will be removed and replaced with a combination of suitable soil, geotextile, and stone to create a durable tread. All soil and stone will be locally sourced, and any trail building equipment used will be cleaned to minimize the risk of introducing exotic plant species. The proposed alignment follows a sustainable grade with a designed 400-foot diagonal section traversing the steepest grade of the trail. Routing will maintain a vegetative buffer to minimize the visual effects to private lands. Erosion control features, such as waterbars, will be used in areas where grade and terrain dictate.

A 0.3 mile section of the Ridge Trail will be widened by up to 3-feet bringing the tread to a 5-foot width. Undergrowth will be brushed 2-feet on each side of the trail bringing the total width to 9 feet. Vegetation will be removed to widen the tread area, but the existing soil will remain in place.

NPS will contract crews to implement the selected alternative. The lower 0.45- mile of proposed trail is in ineligible wilderness¹ (NPS, 1984) while the upper 0.15-mile section is in eligible wilderness. The entire 0.3-mile segment of the Ridge Trail proposed for improvements is within eligible wilderness. In ineligible wilderness, crews will use a mini excavator or skid steer device to limit the disturbance during trail construction. Chainsaws will be used to complete the initial brushing of the trail route. Treadwork and compaction will be completed with shovels, McLeod tools, or other hand tools. In eligible wilderness, only shovels, hands saws, McLeod tools, or other necessary hand tools will be used for trail construction and improvements. The use of hand tools in place of motorized equipment in eligible wilderness avoids a Wilderness Act Section 4c prohibited use and was determined to be the preferred method through the Minimum Requirements Analysis (NPS, 2022b) completed for this project. Work will take place in summer and the total ground disturbance for all work will be approximately 0.4 acres to establish and improve the trail.

The existing trails will continue to be open for use by pedestrians and off-road vehicles (ORVs) where authorized.

Rationale

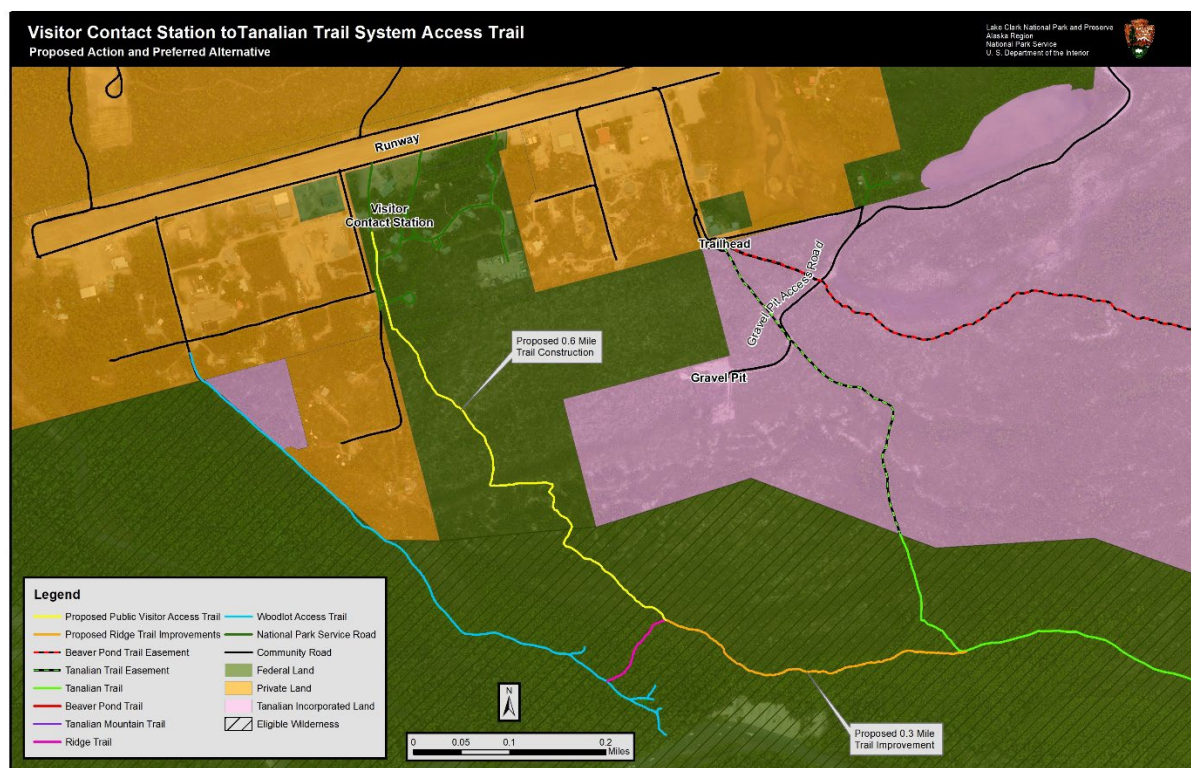
The selected alternative best meets the project purpose to provide direct pedestrian access to the Tanalian Trail System over NPS lands (NPS 2022a, p. 5), avoids an active runway, community roads, and multiple-use trails defined by easements through private lands in Port Alsworth (figure 1). Construction of the pedestrian-only access trail from the Tanalian Trail System to the Visitor Contact Station will improve visitor use and safety by avoiding community roads with high vehicle traffic and diminishes user conflicts (NPS 2022a, p. 10). Trail design and construction would facilitate hiking while reducing the frequency and difficulties of required maintenance (NPS 2022a, p. 7). With pedestrian use directed toward the Visitor Contact Station, visitors would more likely interact with NPS staff at the Visitor Contact Station where they could receive safety and other park information (NPS 2022a, p. 10).

Authorization of the selected action accomplishes LACL management goals from the Lake Clark National Park General Management Plan Amendment (NPS, 2014) to improve accessibility of the Port Alsworth Trails as described in the purpose and need (NPS 2022a, p. 5).

¹ The 1984 LACL General Management Plan included a Wilderness Review per ANILCA Section 1317(a) that applied criteria to all lands within the unit to determine if they were suitable or not for wilderness designation. That assessment found the majority of lands to be suitable (now called eligible) for wilderness designation, and determined the rest of the lands as unsuitable (now called ineligible) for wilderness designation based on criteria like land status and level of existing developments and resource impacts. The Alaska Region uses the categories of designated, eligible, and ineligible to describe the status of park/wilderness lands.

Construction of the trail is anticipated to take place over one month during summer 2022, and four-months during summer of 2023. Noise from construction will be short lived and consistent with noises common to Port Alsworth, as aircraft, vehicles, and construction activity intensify during the summer months (NPS 2022a, p. 10). Signage and closures during trail work will ensure notification of the public and visitors of construction and direct them to alternative trails, maintaining visitor access to popular destinations while maintaining a safe environment (NPS 2022a, p. 10)

Figure 1. Selected Alternative: Construct Visitor Contact Station to Tanalian Trail System Access Trail in Lake Clark National Park and Preserve



3. Potentially Affected Environment and Degree of the Effects

The selected alternative will not have a significant adverse impact on the human environment. This conclusion is based on the following examination of the relevant significance criteria defined in 40 CFR Section 1501.6. The NPS reviewed each of these criteria given the environmental impacts described in the EA (NPS 2022a, Chapter 3).

3.1 Potentially Affected Environment

The ecotypes and vegetation in the project area are among the most common in the Lake Clark basin, comprising over 222,835 acres. The trail construction and improvements will remove 0.4 acres of

vegetation and soil, and have an inconsequential impact on the distribution, quantity, and persistence of these vegetative communities (NPS 2022a, p. 10).

The park is comprised of 1,120,000 and 2,268,435 acres of eligible and designated wilderness, respectively. The constructed trail will develop 0.15 miles and improve 0.3 miles of trail in eligible wilderness, which represents less than 0.2 acres of development in the park's eligible wilderness. This small development will have little impact on the overall undeveloped nature of the park (NPS, 2022a p.11). Increased visitor use of the new trail will reduce solitude on the trail but enhance access to areas beyond the trail where solitude can be found (NPS 2022a, p.11). Because of all these reasons, the project will not have significant impacts on wilderness character.

In accordance with the Endangered Species Act of 1973, the NPS conducted informal consultation with the U.S. Fish and Wildlife Service through the Information for Planning and Consultation Online System on February 3, 2022 to determine if threatened and endangered species occur within the proposed project area. No listed species were identified, therefore no adverse effects to listed species or critical habitat would be result from the project. Therefore, the selected alternative will not adversely affect any listed threatened or endangered species or critical habitat.

The Lake Clark National Park and Preserve archeologist conducted Phase 1 archeological testing along the alignment of the proposed new trail in the summer of 2020 and consulted with the State Historic Preservation Office (SHPO), per Section 106 of the NHPA (Rogers, 2020). A condition assessment and pedestrian reconnaissance survey were conducted along the entire length of the proposed trail. No evidence of cultural remains was uncovered during the pedestrian reconnaissance or the excavations, and it is unlikely that cultural resources would be disturbed by the trail-building activities. Concurrence of "No Historic Properties Affected" for this project was received from the SHPO on 1/5/2021 in response to consultation initiated by letter on 12/04/2020. During project implementation, if tread work exposes cultural resources, work will be stopped, the park archeologist will be notified immediately, and additional archeological testing will be conducted (NPS 2022a, 8).

3.2 Degree of Effects

As described in the EA, (NPS 2022a, 8-9), the selected alternative has potential beneficial and adverse impacts—both short and long-term—associated with recreation and visitor use, vegetation and soils, and wilderness. There are no wild and scenic rivers, ecologically critical areas, wetlands or floodplains in the project area (NPS 2022a, 6-7).

No significant impacts to resources that will require analysis in an environmental impact statement were identified.

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. All elements of the selected alternative are common management actions conducted at national parks.

In the context of determining significance, "controversial" refers to circumstances where a substantial dispute exists as to the environmental consequences of the proposed action and does not refer to the existence of opposition to a proposed action, the effect of which is relatively undisputed (43 CFR Part

46.30). Throughout the EA process, no environmental impacts associated with the selected alternative have been identified as controversial. The NPS conducted internal and external outreach and provided a public comment period (April 21-May 6, 2022). Comments were solicited from tribes, Alaska Native Claims Settlement Act (ANCSA) corporations, and the public. The NPS received 6 comments, of which 4 was substantive (Appendix A). The NPS considered these comments when finalizing the EA and determining the FONSI.

As analyzed in the EA, the anticipated impacts to the human environment are not highly uncertain or unique and do not involve unknown risks. Resource conditions in the project area are well known and the anticipated impacts from implementing the selected alternative are understood based on NPS experience with similar projects.

Recreation and Visitor Use. During trail construction activities, noise will be created by motorized equipment and heard at the new construction site and the Visitor Contact Station. As described in the EA, the impacts from noise will be short-term (occur across a span of two construction seasons) (NPS 2022a, p. 10) and would not differ from the existing condition of noise generated in the summers from routine maintenance. Therefore, there will be no significant impacts caused by noise from project activities.

The temporary sounds and trail closures result in short-term adverse effects to recreation and visitor use, lasting an estimated 1 month during 2022 and 4 months during 2023. Long-term benefits include direct pedestrian-only access from the Visitor Contact Station to the Tanalian Trail system, reducing safety risks from current travel via community roads, and reducing user conflict.

Vegetation and Soils. Removal of approximately 0.4 acres of vegetative cover will likely result in long-term adverse impacts to the local plant community, although the impacts would have a negligible impact on overall species survival of effected vegetation and the vegetative communities in which they are found.

The short-term impact of 0.4 acres of vegetation removal will result in adverse effects to trees and shrubs (NPS 2022a, p. 10). This impact will not result in significant impacts because these vegetation communities are common across the landscape (Id.) and there are no sensitive or listed vegetation species that will be adversely affected by this disturbance.

Wilderness. The constructed trail will adversely affect wilderness character by diminishing the undeveloped quality through the construction of 0.15 mile of new trail and improvement to 0.3 miles of the Ridge Trail. Increases in visitor use could reduce the opportunity for solitude on the trail but improved trail access could increase the opportunity to access untrailed areas beyond the trails system where primitive and unconfined recreation opportunities exist. A Minimum Requirements Analysis (MRA) was developed for this project and signed by the park superintendent on March 22, 2022 (NPS, 2022b). Per the MRA, no prohibited uses are proposed in eligible wilderness as part of this project. All trail construction and improvements in eligible wilderness will be completed using hand tools. The long-term impacts to wilderness character will be the be diminishment of the undeveloped quality through developing 0.15 miles of trail in eligible wilderness. The 0.15 miles of trail corresponds to approximately 0.1 acres of development within the 1,120,000 acres of eligible wilderness in LACL. There will be both short and long-term adverse impacts to solitude due to the presence of contractors constructing and improving the trail as well as the concentration of use to the newly developed trail, respectively. The work to construct and improve the trail is short-term, lasting two construction seasons, so impacts to

solitude will be temporary and there will be no lasting significant impacts on solitude. Concentration of visitor use to the developed trail will impact solitude but will not significantly alter existing levels of solitude on the trail system. Long-term beneficial impacts to the primitive and unconfined recreation opportunities will result from the improved access to more remote areas beyond the trail system.

3.3 Effects on Public Safety

For safety reasons the area of the new trail and the Ridge Trail will be closed to the public during construction and improvement. During this period, alternative trails will need to be used to access the Tanalian Trail System. This will be restricted to one month in the summer of 2022 and four months in the summer of 2023, with signage posted notifying the public of the closure due to construction activity at the Visitor Contact Station, trailheads, park website, and social media outlets. During construction, there will be noise heard from motorized equipment on the existing Tanalian Trail and at the Visitor Contact Station. The noise created during construction will not differ from the noises of construction, maintenance, or aviation use that are common within the community during summer. These impacts will be short-term and constrained in time and space to areas adjacent to the construction. The selected alternative will result in long-term positive impacts on public safety and visitor experience.

4. Public Involvement and Agency Consultation

The park began consultation in August 2020 with the SHPO regarding the proposed project. The SHPO reviewed the park's archeological testing report (Rogers, 2020) per Section 106 of the NHPA. The testing found no evidence of cultural remains during the pedestrian reconnaissance or the excavations and determined it would be unlikely to disturb cultural resources during trail-building activities. The SHPO concurred with LACL's finding of "No Historic Properties Affected" for this project on 1/5/2021.

The park initiated Tribal Consultation with an in person meeting with Kijik Corporation on November 23, 2021. Based on this meeting, NPS concluded that the Kijik Corporation had no concerns related to the project. The NPS provided them with the EA during the EA public comment period, will distribute the FONSI to them, and will continue to provide them with project updates.

The NPS provided a public comment period on the EA through Planning, Environment, and Public Comment (PEPC) from April 21 – May 6, 2022. Three submissions that resulted in 4 substantive comments were received through PEPC and the park e-mail (Appendix A). The NPS considered these comments when finalizing the EA and determining this FONSI. Through internal and public review, the NPS made minor improvements to the EA, which serves as the final EA documentation for this FONSI.

5. Conclusion

As described above, the selected alternative will affect recreation and visitor use, vegetation and soils, and wilderness. The NPS found these effects would not have the potential for significant impacts, as described above. Additionally, based on the Non-Impairment Determination, NPS concluded the proposed action will not result in impacts to park resources and values that constitute impairment (Appendix B).

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.

As disclosed in the EA and this FONSI, the selected alternative does not violate any federal, state, or local environmental protection laws.

Based on the foregoing information, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

6. References

National Park Service. 2022a. Visitor Contact Station to Tanalian Trail System Pedestrian Access Trail Environmental Assessment. National Park Service. Anchorage, Alaska.

National Park Service. 2022b. Minimum Requirements Decision Guide Workbook– Visitor Contact Station Access Trail. National Park Service. Anchorage, Alaska.

National Park Service. 2014. Lake Clark National Park and Preserve General Management Plan Amendment/Environmental Assessment. National Park Service. Anchorage, Alaska.

National Park Service. 1984. General Management Plan and Environmental Assessment, Lake Clark National Park and Preserve. National Park Service. Anchorage, Alaska.

Rogers, J. 2020. Visitor Center Connector Trail – Report of Archeological Testing 2020. National Park Service. Anchorage, Alaska

Appendix A: Response to Public Comments

On April 21, 2022, the NPS released the Visitor Contact Station to Tanalian Trail System Access Trail EA for public review and comment. The EA was available for public review until May 6, 2022. The NPS accepted comments through the NPS's online PEPC system and via email.

A total of 3 submittals were received during the public review period from the public. All correspondences are maintained in the project decision file. The 3 submittals resulted in 4 substantive comments. A comment is a portion of text within a submittal that addresses a single subject or issue. Comments were received on 4 topics, including alternatives, soundscape, visitor safety, and wildlife.

Responses to public comments typically address substantive comments that were received during the public review period. The *National Park Service NEPA Handbook* defines substantive comments as 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 identified as substantive and responses are provided below.

1. Comment Summary: A commenter suggested an alternative to modify the existing segment of the Tanalian Trail occupying the easement should be considered.

Response: An alternative considering modification of the existing Tanalian Trail occupying the easement was not considered because this proposal is technically infeasible due to the spatial boundaries of the easement. To create an acceptable grade on the existing trail would require switchbacks that extend beyond the boundaries of the easement. Additionally, the use of community roads along an active runway and crossing the gravel pit access road would remain, continuing to present safety concerns for visitors and the local residents using the trails.

2. Comment Summary: A commenter suggested that the duration and type of work will have impacts on the soundscape.

Response: The EA disclosed the impacts to soundscape (NPS 2022a, p. 10). The EA disclosed the project will take place over 2 summers due to the need to contract the work, not the duration needed to complete the project. The estimated total time to complete the work is 5 months. The sound from the mechanized equipment used for the work will not add appreciably to the existing soundscape and this noise will only occur when working in ineligible wilderness. The addition was determined to be negligible due to the high volume of aircraft, heavy equipment, and vehicle

use within the community of Port Alsworth and the proximity of the segment of trail where mechanized equipment will be used to Port Alsworth.

3. Comment Summary: A commenter wanted to know what measures would be taken to ensure pedestrian safety during trail construction.

Response: For safety reasons the area encompassing the new trail and the Ridge Trail will be closed to the public during construction and improvement (NPS 2022a, p. 10). During this period, alternative trails will need to be used to access the Tanalian Trail System. This will be restricted to 2 periods over the summer of 2022 and 2023, with signage posted notifying the public of the closure due to construction activity at the Visitor Contact Station, trailheads, park website, and social media outlets.

4. Comment Summary: A commenter suggested the trail would have adverse impacts to wildlife.

Response: The wildlife habitat type is common with no ecologically critical areas in the project area (NPS 2022a, p. 6). The alteration of an estimated 0.4 acres of habitat and associated displacement of wildlife will have a minimal impact on local wildlife populations due to its relatively small size, short construction period, and existing development on private lands on adjacent parcels to the proposed trail.

Appendix B: Non-Impairment Determination

The NPS Organic Act of 1916 and the General Authorities Act of 1970 prohibit impairment of park resources and values. The NPS Management Policies 2006 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 (NPS, 2006). 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 enable people to have present and future opportunities to enjoy them.

A determination of impairment is made for each of the resources carried forward and analyzed in the EA. Impairment is an impact that—in the professional judgement of the responsible NPS manager—will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation 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
- identified as a goal in the park’s general management plan or other relevant NPS planning documents

An impact will be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and cannot be further mitigated.

The Visitor Contact Station to Tanalian Trail System Access Trail EA (NPS, 2022a) incorporates mitigation measures and Best Management Practices, therefore reducing or eliminating effects to several resources.

The NPS has determined that trail construction and improvement will not result in impairment of park resources and values. An impairment determination is made for the resource impact topics analyzed in detail for the selected alternative, with the exception of recreation and visitor use. Recreation and visitor use are not considered park resources and therefore do not apply to impairment determinations. Non-resource topics are not assessed for impairment, and this determination applies only to NPS lands and resources and has been rendered solely by NPS management.

Vegetation and Soils. Vegetation and soils are not identified as a specific purpose in the establishing legislation of the park and are not specifically mentioned in LACL’s general management plan as central to maintaining the park’s significance. Up to 0.4 acres of vegetation will be directly impacted through removal during trail construction and improvement. The vegetation in the affected area is common and found throughout the park and does not include any endangered or protected species. The loss of

vegetation will not impact the park's ecosystem. Through mitigation measures, the level of disturbance from the selected alternative will not result in impairment to vegetation and soils.

Wilderness. The selected alternative will have short-term impacts to wilderness lasting during construction, as well as long-term impacts from the presence of the trail. The selected alternative will degrade the untrammeled, undeveloped, and natural qualities of wilderness character, and temporarily decrease opportunities for solitude; however, impacts will be reduced through mitigation measures (NPS 2022a, 22) and variations described in the Wilderness Act Minimum Requirement Analysis. By implementing these measures, the level of impact from the selected alternative will not result in impairment to wilderness.

SUMMARY

The NPS has determined that the construction and improvements to create the Visitor Contact Station to Tanalian Trail System Access Trail will not constitute an impairment of the resources or values of LACL. As described above, the Visitor Contact Station to Tanalian Trail System Access Trail is not anticipated to impair resources or values that are essential to the purposes identified in the enabling legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the NPS Management Policies (NPS, 2006).

References

National Park Service. 2006. Management Policies 2006. U.S. Department of the Interior, National Park Service, Washington, D.C.