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PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-EQ)

25 JUN 2010

Memorandum

To: Superintendent, Crater Lake National Park

From: Acting Regional Director, Pacific West Region

Subject: Environmental Compliance for the Construction of Plakini Falls Trail

The *Finding of No Significant Impact* for constructing this new trail - in keeping with the direction in the GMP to expand such visitor opportunities - is approved. To complete this particular compliance effort, the park should send its notice of the decision to all individuals and organizations who received or commented on the supporting environmental assessment.

George J. Turnbull

Attachment

NATIONAL PARK SERVICE
FINDING OF NO SIGNIFICANT IMPACT
Construct Plaikni Falls Trail and Parking Area
ENVIRONMENTAL ASSESSMENT
Crater Lake National Park
June 2010

The Department of the Interior, National Park Service (NPS), has prepared this Finding of No Significant Impact (FONSI) on the Environmental Assessment (EA) for the Plaikni Falls Trail and Parking Area in Crater Lake National Park. This FONSI is a statement of the decision made, other alternatives considered, public involvement in the decision making process, the basis for the decision, the environmental preferable alternative, and measures to minimize environmental harm.

The National Park Service prepared an Environmental Assessment (EA) describing the environmental effects of a proposal to construct a new trail within Crater Lake National Park. Park management will construct a new trail to a waterfall in the Anderson Bluff area as described below. The name Plaikni Falls Trail was selected in recognition of the Klamath Tribes cultural affiliation with the park and in honor of the people who traditionally used this area.

PURPOSE AND NEED

Crater Lake National Park management proposes to construct a new trail to a waterfall in the Anderson Bluff area of the park. Developing new short front-country trail opportunities are identified within the park's current General Management Plan (GMP) as an appropriate action which the park can use to emphasize recreational diversity and provide opportunities to learn about park resources. This environmental assessment is tiered from the broader assessment of impacts from the park's GMP and additionally evaluates the site specific impacts of developing this trail.

The development of the trail will serve several purposes including: 1) Providing a transitional experience between park front and back-country; 2) Providing new interpretive opportunities that show both natural and cultural features; 3) Providing a trail that could be used by those with different degrees of physical mobility; 4) Enhancing visitor opportunities for solitude and primitive experiences; 5) Providing a trail that travels to a special location of natural beauty and; 6) Supporting the goals presented in the General Management Plan (GMP) by encouraging visitors to visit other areas of the park, reducing congestion at Rim Village.

SELECTED ACTION & OTHER ALTERNATIVES CONSIDERED

The National Park Service considered the following alternatives, which included the No Action Alternative, and the Proposed Alternative.

- No New Trail Constructed in the Anderson Bluff Area (No Action)

Under this alternative no action would be taken to construct any additional trails at the Anderson Bluff area.

- Construct New Plaikni Falls Trail in the Anderson Bluff Area (Selected Action)

There are no substantial changes (from what was described as the preferred alternative in the EA) incorporated herein. Approximately one mile of new trail through level terrain to the base of a waterfall located on Sand Creek will be constructed. The trail and parking area will be designed according to Outdoor Accessibility Area Standards ADA guidelines. Trail grades will not exceed five percent at any given point along the proposed route with a three percent cross slope where necessary. Trail structures found along the trail route include a thousand feet of stone foot railing on outer trail edge, five rest areas, three native stone benches, one sign, along with approximately two hundred feet of stone wall, a wider viewing area with one native stone bench and one sign at the waterfalls. Trail surfacing will be native $\frac{1}{4}$ minus stone from the adjacent quarry and will be compacted for wheel chair use. The trail leading into the waterfall will use a technique called a causeway. This technique provides a raised tread and includes a stone curb.

Additionally a 2000 square foot graveled parking area will be constructed off the Pinnacles road with two signs located along the road to provide visitors a forewarning of the trail location. This parking area will accommodate approximately 10 cars. It will be built with native materials with a two percent cross slope and along with a 130 foot drainage ditch at the front of the parking. Although this area is very level and shows little evidence of drainage issues, a swale-type drain would be placed along the front edge to accommodate any water flow from snowmelt or rainfall. Paving will be completed at the same time the Pinnacles Road is repaved in the future.

OTHER ALTERNATIVES CONSIDERED BUT DISMISSED

The National Park Service considered and dismissed one additional alternative. This alternative would have rehabilitated an existing roadbed in the Anderson Bluff Area and would require new trail to be constructed along Sand Creek to the falls. This alternative was dismissed from further consideration based on deficiencies associated with a number of factors including: sustainable design in developing facilities; budget costs; natural resource impacts; and visitor use and experiences

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

As documented in the EA, the park determined that the environmentally preferred alternative for this project is Alternative 2, the Preferred Alternative. The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (sec. 101 (b)). This includes alternatives that:

1. Fulfill the responsibilities of each generation as a trustee of the environment for succeeding generations.
2. Ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, whenever possible, an environment that supports diversity and variety of individual choice.
5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depleted resources.

In the EA the preferred Alternative was identified as the environmentally preferred alternative for Crater Lake National Park since it meets goals 1, 2, 3, and 5 described above. Under this alternative, trail management activities would promote those goals stated NEPA and provide a solution to meet management goals set in the General Management Plan. These include: 1) enhancing visitors' experiences; 2) fulfilling stewardship roles; 3) providing a safe environment for visitors to view resources; and 4) providing a well designed/constructed trail to minimize annual maintenance needs.

This alternative fulfills park managers' responsibility to current and future generations by ensuring safe, esthetically and culturally pleasing surroundings and minimizing degradation of the environment while achieving a balance between visitors and resources use.

BASIS FOR DECISION

The National Park Service has decided to implement Alternative 2 (Construct New Plaikni Falls Trail in the Anderson Bluff Area) as described above. The National Park Service has selected Alternative 2 because it enhances visitors' experiences; fulfills stewardship roles; provides a safe environment for visitors to view resources; and provides a well designed/constructed trail to minimize annual maintenance needs. This fulfills the park's responsibility to current and future generations by ensuring safe, aesthetically and culturally pleasing surroundings; by minimizing degradation of the environment and improving the quality of the visitors' experience at Crater Lake National Park.

MEASURES TO MINIMIZE ENVIRONMENTAL HARM

All practicable measures to avoid or minimize environmental impacts that could result from implementation of the selected action have been identified and incorporated into the selected action (Table 1). Implementation of the selected action would avoid adverse impacts on wetlands and avoid any known federally listed or candidate species and avoid the destruction/adverse modifications of the critical habitat of such species.

Table 1. Mitigation Measures

Mitigation	Critical Milestones	Responsible Party
Ensure visitor experience and safety	Trail will remain closed during construction phase. Work crews will be informed of the need to be aware of the public and to what safety measures would be needed	Visitor and Resource Protection Division
Minimize impacts to federally threatened and endangered species	Surveys will be conducted prior to construction to ensure construction work will not harm any threatened/endangered species. Work will be modified to protect any species found.	Resource Preservation and Research Division
Minimize impacts species of management concern	Surveys will be conducted prior to construction to ensure work will not harm any species of management concern including state listed threatened/endangered species or federal candidates.	Resource Preservation and Research Division

Minimize impacts to vegetation	Surveys will be conducted prior to trail/parking construction for rare plant species. Work is designed to prevent damage to large diameter trees. No trees over six inch diameter will be removed. There is little understory in project area however, if rare plants are found project will be modified to avoid populations. Plants will be salvaged in any areas that plants needed to be removed and replanted.	Resource Preservation and Research Division
Minimize impacts to cultural resources and scared Indian sites	2009 surveys found no sites. Any finds located during fieldwork, will require all work to be stopped and the Park's Historian will be contacted.	Interpretation and Cultural Resource Management Division
Minimize effects to wetlands/water quality	Trail is designed to avoid wetland habitat and minimize indirect damage to wetlands from trail construction. The proposed trail will have barriers and signage designed to restrict visitors from wetland areas.	Resource Preservation and Research Division

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE QUALITY OF THE HUMAN ENVIRONMENT

The NPS used the following NEPA criteria and factors defined in 40 CFR §1508.27 to evaluate whether the Selected Alternative would have a significant impact on the environment.

Degree of effect on public health or safety.

There is no anticipated affect on public health or safety from the selected alternative.

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

The project is located in an area that has wetlands. While the proposed trail corridor was selected to avoid trail construction in wetland habitats, there could be some indirect impacts to water quality from erosion and sedimentation during construction. Through proper erosion control and trail design these potential impacts will be minimized. There were no observed hydrologic features that suggested the trail would significantly alter surface flow direction or quantity. The selected route will be staked to the actual trail location and width which will allow crews to construct the trail in the proper location. Wetlands will be flagged and workers notified to avoid working or placing materials in the wetland area so that there will not be impacts from the trail workers.

Degree to which effects on the quality of the human environment are likely to be highly controversial.

Previous park projects to realign current trails or to develop new trails have not been controversial in the past. We received only three letters during our scoping and public comment periods. Constructing a trail in this area of the park is not considered to be highly controversial.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

The trail work that is proposed has been done routinely in the park. Some preconstruction surveys will be conducted to confirm that there are no species of management concern in the area. The potential impacts of the project are predictable and are minor.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The project represents a pilot project to develop short transitional trails as prescribed by the park's General Management Plan (GMP). The project does not establish a precedent for future actions but rather implements broad direction established in previous planning, and is not dissimilar to other trail construction projects completed elsewhere in the park.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The project is related to the broader goal of developing increased opportunities for non motorized recreation as prescribed by the park's General Management Plan (GMP). The cumulative effects of developing additional park trails for this purpose were evaluated in the Environmental Impact Statement for the GMP. The potential cumulative impacts attributed to all actions prescribed in the GMP including new trails were deemed to be moderate on park operations, negligible to minor on the natural/cultural resources including wetlands and threatened, endangered and sensitive species. Actions prescribed in the GMP are expected to add minor to major benefits to the visitor experience overall. No unavoidable adverse impacts of major intensity would result from implementing any of the future proposals in the GMP.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The project will not adversely affect districts, sites, highways, structures or objects listed on the National register of Historic Places and will not cause the loss or destruction of significant scientific, cultural, or historic resources.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat.

The project may affect but is not likely to adversely affect the northern spotted owl. The project will not affect any other listed species or habitat. This determination was made collectively with the USFWS and the National Park Service.

Whether the action threatens a violation of Federal, state or local environmental protection law

The project will not violate any Federal, state or local laws.

PUBLIC INVOLVEMENT AND AGENCY PARTICIPATION

Scoping

Internal scoping was completed by the interdisciplinary team on January 8, 2010. Internal scoping was completed for the project using the project's environmental screening form. Public scoping for additional issues and concerns was conducted from January 15 through February 16, 2010. Comments were solicited through a mailing to fifteen different, interested and affected groups, general press release to media contacts and general availability EA at local public libraries and on the park's website. Oregon Wild responded with general concern for natural resources but otherwise supported the project. Other previous trail construction projects in the park such as Stuart Falls Relocation and Pacific Crest Trail Rehabilitation projects received similar limited public response from notification of upcoming trail projects. In general past public comments received during the GMP process were focused on other issues unrelated to trails although one comment was received in strong support for an increase in new short trails.

Notification of the development and availability of the EA was sent on January 15, 2010 to the following agencies: Oregon State Historic Preservation Officer, Fremont-Winema National Forest, Rogue River National Forest, US Fish and Wildlife Service, Oregon Department of Fish and Wildlife District Office, Klamath Tribes, Crater Lake Natural History Association

Internal and public scoping comments focused on potential impacts to soils, air quality, natural sounds, threatened, endangered and sensitive species, water quality and wetlands, cultural resource including sacred sites and visitor experience. These areas of concern formed the impact categories that were evaluated in the EA.

EA Review

The Construct New Plaikni Falls Trail and Parking Area EA was distributed and available for public review between April 26, 2010 and May 26, 2010. Approximately fifteen letters inviting the public to comment and informing them where the EA was available were sent out April 26th. These letters were sent to those individuals on the park's mailing list and to other interested groups. Public notification was placed on Crater Lake National Park's web site with links to access the EA. Three printed copies of the EA were made available one each at the Crater Lake National Park Headquarters, at the public libraries in Klamath Falls and Medford located in Oregon. Our notices indicated that a printed copy would be made available to anyone upon request. A press release was sent to approximately sixty different newspapers, television news stations, and radio stations located in Oregon, Washington and California.

Two comment letters were received through the public review period, one from the Public Employees for Environmental Responsibility (PEER) group and one from a single individual. Comments from PEER expressed numerous concerns relating to the number of alternatives analyzed, potential impacts to wetlands and riparian areas, plants, wildlife and the effectiveness of mitigations. The letter from the individual expressed concerns over impacts from the interpretive signage along the trail.

PEER suggested that we look at upgrading the park's current trail system as an alternative to constructing a new trail. This alternative was evaluated previously as part of the broader management strategy of the park's GMP. During the development of the long term management strategy for the park, planners looked at relative merits and impacts of

maintaining the existing trail system as well as greatly expanding the current trail system to introduce visitors to a diverse range of ecosystems and terrain and to accommodate ability and experience levels. The selected alternative provided for the addition of new trails and specifically identified additional short transitional trails such as the proposed Plaikni Trail as a desirable non motorized recreational opportunity for the public.

PEER also expressed concerns over the direct natural resource impacts of the project due to trail construction as well as the indirect impacts due to visitor use. It is expected that the direct impacts from trail construction on sensitive resources and habitats such as wetlands and rare plants can be mitigated through avoidance.

The project area was evaluated by the Park's Aquatic Ecologist for potential impacts to wetlands. He looked at the direct and indirect impacts due to trail construction as well as indirect impacts to wetlands from trail (visitor) use. Through proper erosion control and trail design these potential impacts can be minimized and it is the opinion of the Aquatic Ecologist that the proposed trail will have minimal short-term and negligible long-term impacts to water quality and negligible or no impact to flow.

Several factors were considered to estimate the amount trail visitation and resulting impacts from public use of the trail. The proposed new Plaikni Falls Trail is located along the Pinnacles Road which accesses the park's Lost Creek Campground and terminates at a scenic overlook. The Pinnacles Road is open for use generally by mid July and closing in October with the peak visitor use occurring in August. A visitor use study in 2003 indicated an average visitation on the Pinnacles Road to be approximately 113 (daily average) cars during peak season. This represents a small percentage of park visitors that visit this area of the park. The study also indicated that less than 1% of visitors use the backcountry of the park. Park trailhead parking areas only reach their highest use during the peak season in August and only the Cleetwood Cove Trail parking surpasses its use capacity. The NPS anticipates that impacts from visitor use will be minor and will be further reduced through the use of appropriate trail design and barriers to sensitive habitats.

The analysis of impacts to plant communities and in particular, Federally listed threatened, endangered or candidate species or other rare plants and plant species of concern, is based on current knowledge of plant communities in the project area, locations of rare plants and plant species of concern in the park and the results of reconnaissance level surveys of the plant communities and habitats along the alignment of the proposed Plaikni Falls Trail conducted in 2009. Applegate's milk vetch (*Astragalus applegatei*) is the only Federally threatened, endangered or candidate species listed as occurring in Klamath County. The species is limited to three populations located well outside of the park. There are no known occurrences of this plant in the park. If this plant were found in subsequent surveys of the project area the park would be required to stop the project and initiate consultation with the USFWS. It is the opinion of the park Terrestrial Ecologist that based on these preliminary surveys and previous information on species of concern in the park that it is unlikely that other rare plants or other species of concern will be found in the project area.

However, it is recognized that once the final trail alignment is determined on the ground a more detailed survey for rare plants and other species of concern is desirable previous to the project construction to assure that if these species are found through additional surveys, they will not be significantly impacted by trail construction and use. Likewise localized populations of invasive exotic plants will be avoided and targeted for treatment to limit the potential for spread.

Impacts to Federally listed wildlife species were evaluated in a separate Biological Assessment and discussed below. There may be other wildlife species that use habitats in the project area. We expect that migratory species such as ungulates, small mammals or birds may avoid the area temporarily during times of trail construction or human use. We believe that these impacts will be short term and minor. Less mobile species such as

amphibians may be found in wetland habitats. Measures aimed at protecting wetland habitats will likewise minimize impacts to amphibians.

The mitigation measure to avoid impacts to rare plant species or species of concern requires that the trail would be relocated so as not to cause direct impacts to these species from trail construction. In the unlikely case that rare plants and species of concern are found in the project area and that significant impacts to these species cannot be avoided through trail alignment or other means, the project would not be initiated as planned. In addition mitigating measures are identified to reduce the impacts from visitor use through barriers and educational signage. Stone barriers have been found to be an effective way to protect natural resources. Signs are considered an important tool for four general purposes: direction, identification, education and regulation. Signs are a proven method for educating and mitigating damage to the natural surroundings.

The EA was not changed in response to the public comments received.

Agency Consultation

The National Park Service sent letters to consult with the following agencies before developing the EA proposing this project.

- Fremont-Winema National Forest
- Rogue-Siskiyou National Forest
- US Fish and Wildlife Service (USFWS)
- Oregon Department of Fish and Wildlife District Office
- Klamath Tribes
- Crater Lake Natural History Association
- State Historic Preservation Office
- Native Tribes affiliated with the park

In March, 2010, the National Park Service completed a Biological Assessment (BA) of the potential impacts to Threatened and Endangered Species and submitted it to the U.S. Fish and Wildlife Service (USFWS) as required by the Endangered Species Act. The BA found that the proposed Plaikni Trail construction would have no affect on: bull trout or its critical habitat, Canada lynx or northern spotted owl critical habitat. The BA found that the proposed project may affect but is not likely to adversely affect the northern spotted owl. The potential to affect northern spotted owls was based on a potential for project activities to disturb spotted owls that might be within the project area. While the current status of spotted owls in the project area is unknown, spotted owl surveys will be performed prior to any project operations, and the park Wildlife Biologist will communicate all results to the Klamath Falls USFWS Service office. The USFWS, in their Biological Opinion concurred with the BA and does not require further consultation on the project unless new information reveals impacts from the project not anticipated in our BA.

The Klamath Tribe expressed support for the project and did not have any stipulations.

IMPAIRMENT

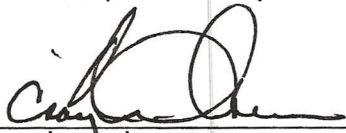
The National Park Service has determined that implementation of the selected alternative and mitigation measures will not constitute impairment to Crater Lake National Park resources and values. There would be no major adverse impacts to a resource or value whose conservation is 1) necessary to fulfill specific purposes identified in the park's establishing legislation; 2) key to the natural or cultural integrity of the park or to

opportunities for enjoyment of the park; or 3) identified as a goal in the park's General Management Plan or other relevant NPS planning documents. This conclusion is based on a thorough analysis of the environmental impacts described in *Construct Plaikni Falls Trail and Parking Area*, Crater Lake National Park Environmental Assessment, the mitigation measures, agency consultations, considerations of the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies.

CONCLUSION

Implementation of the Selected Alternative for the Plaikni Falls Trail and Parking Area will not have significant impacts on the human environment. The determination is sustained by the analysis in the EA, agency consultations, the inclusion and consideration of public review, and the capability of mitigations to reduce or avoid impacts. Adverse environmental impacts that could occur are negligible to minor in intensity, duration, and context and less-than-significant. As described in the EA, there are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence. There are no previous, planned, or implemented actions, which in combination with the selected alternative would have significant effects on the human environment. Requirements of the National Environmental Policy Act have been satisfied and preparation of an Environmental Impact Statement is not required. The park will implement the Selected Alternative as soon as practical.

Recommended:



Superintendent
Crater Lake National Park

Date:

6/16/2010

Approved:



Regional Director
Pacific West Region
National Park Service

Date:

6/25/10