National Park Service
U.S. Department of the Interior

Denali National Park and Preserve
Alaska

Finding of No Significant Impact

Winter Road Plowing in Denali National Park

June 2013

Recommended: _____ 6/3/13
Superintendent, Denali National Park and Preserve — Date

Approved: _____ 6/20/13
Regional Director, Alaska — Date

FINDING OF NO SIGNIFICANT IMPACT

Winter Road Plowing in Denali National Park

Denali National Park and Preserve, Alaska
June 2013

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate alternatives for winter road plowing in Denali National Park and Preserve.

The NPS has selected Alternative 4, to plow the Park Road on a trial basis for 3-5 years in order to provide vehicle access to Mountain Vista Rest Area by mid-February each year. No improvements to the Spring Trail or Mountain Vista Rest Area would be made, but on-going maintenance described in the 2002 *Environmental Assessment for Construction of a Springtime Dogsled and Skiing Trail from Headquarters to Mile 7 of the Park Road* would continue. Winter over-snow trails would be established by users and trail grooming would not occur. The road from mile 3 to mile 12 will no longer be managed as part of the backcountry hiker area during the month of February during this trial period as previously identified in the Denali National Park and Preserve Backcountry Management Plan, 2006. With this planning document Commercial vehicles will be allowed to travel to the Mountain Vista Rest Area.

Commercial operators would be required to carry an emergency communications device. The NPS will evaluate visitation data after the trial period to determine if opening the road earlier to visitors warrants the increased operational costs. Commercial operators may be asked to assist with the increase of operational costs for this project. The park may undertake a financial feasibility study to determine if there are other viable options to fund the increased operational costs. Depending on the findings, the NPS may eliminate the plowing effort or continue it annually. If new information shows that an earlier opening may have positive results, the park would undertake additional compliance to evaluate an earlier date for plowing and opening the road.

Responses to public comments are found in Attachment A. An Errata section has been provided in Attachment B that provides clarifications, modifications or additional information to the EA.

ALTERNATIVES

Four alternatives were evaluated in the EA.

Actions Common to all Alternatives

- Park staff would work towards better park promotion for winter visitation to dispel the perception that the park is closed in the winter.
- Park staff would provide printed and online information on proper clothing and equipment to enhance the experience for winter visitors.
- The *2002 Environmental Assessment for Construction of a Springtime Dogsled and Skiing Trail from Headquarters to Mile 7 of the Park Road* would continue to be

implemented. This would include the following trail work: brushing, opening the canopy, and use of planks for seasonal bridges over aufeis areas and drainages.

Actions Common to all Action Alternatives (change to EA. See Errata)

- Commercial operations would be authorized under Commercial Use Authorizations.
- If specialized kennels tours are provided for commercial groups, the increased operational costs would be offset with an Amenity Fee.

Alternative 1 – No Action – No plowing past park headquarters (mile 3)
During winter months snow on one lane of the Park Road would continue to be packed from mile 3 to mile 7 to allow maintenance activities that prevent the buildup of ice on the road. This section of the Park Road would continue as a designated backcountry hiker area during winter months. It would remain unplowed until spring snow removal operations begin, which can be as early as March 1.

Alternative 2 – Plow road for full winter season and allow additional improvements to the Spring Trail
Under Alternative 2, the NPS would keep the Denali Park Road open to the Mountain Vista Rest Area year round. The road would be plowed at a level 3 priority (see Table 1) with additional staffing. An emergency communication device with direct connection to the park communications center may be installed at Mountain Vista Rest Area. The existing shelter at Mountain Vista Rest Area may be seasonally modified into a warming hut. No plug-ins would be installed at the rest area. Additional work on the Spring Trail would include the relocation of boulders and realignment of up to 1,000 feet of trail near Hines Creek to improve usability. Paved sections of Riley Creek Campground not used for winter camping would be groomed using construction equipment and drag to serve as an alternative to the Park Road for beginner skiers and skijorers. The road from mile 3 to mile 12 would no longer be part of the winter backcountry hiker area as designated in the Backcountry Management Plan. Spring Trail improvements would be completed prior to the opening of the road for winter visitors for the full winter season.

Table 1 – Plowing Priority Levels

Plowing Priority	**Area to be Plowed**
Level 1	Park Road from Parks Highway to Park Headquarters
Level 2	Secondary roads and parking areas throughout the administrative and housing areas in Park Headquarters and C-Camp
Level 3	Park Road from Park Headquarters to Mountain Vista
Level 4	Residential area driveways and paths

Alternative 3 – Plow road for partial winter season beginning mid-January with minor changes to the Spring Trail

Under Alternative 3, the NPS would open the Park Road for vehicle use in mid-January to the Mountain Vista Rest Area with no additional staffing. The road would be plowed at a level 3 priority (see Table 1). An emergency communication device with direct connection to the park's communication center may be installed at Mountain Vista Rest Area. No plug-ins would be installed at the rest area and no warming hut would be available there. Additional work to the Spring Trail would be limited to the relocation of boulders. Winter over-snow trails would be established by users and trail grooming would not occur. The road from mile 3 to mile 12 would not be a winter backcountry hiker area during these months.

Alternative 4 (NPS Preferred) – Plow road on a trial basis for 3-5 years beginning mid-February

Under Alternative 4, the NPS would open the Park Road to the Mountain Vista Rest Area for vehicle use in mid-February for a three – five year trial period. With this planning document Commercial vehicles will be able to travel as far as Mountain Vista Rest Area.

No additional staffing would be added and the road would be maintained at a level 3 priority (see Table 1) to provide safe driving. No vehicle plug-ins would be installed at the rest area and there would be no warming hut or emergency communication device installed. No improvements to the Spring Trail beyond those outlined in the 2002 Spring Trail EA are anticipated under this alternative. Winter over-snow trails would be established by users and trail grooming would not occur. The road from mile 3 to mile 12 would not be part of the winter backcountry hiker area for the month of February as designated in the 2006 Backcountry Management Plan.

Commercial operators may be required to carry an emergency communications device.
The NPS will evaluate visitation data after the trial period to determine if opening the road earlier to visitors warrants the increased operational costs. Commercial operators may be asked to assist with the increase of operational costs for this project. (Estimated startup and annual costs of alternatives are located in Appendix E in the EA.) The park may undertake a financial feasibility study to determine if there are other viable options to fund the increased operational costs. Depending on the findings, the NPS may eliminate the plowing effort or continue it annually. If new information shows that an earlier opening may have positive results, the park would undertake additional compliance to evaluate an earlier date for plowing and opening the road.

Environmentally Preferable Alternative
Considering that opening the road would result in more vehicles traveling farther into the park, which may affect wilderness character and solitude, and that work on the Spring Trail as described in Alternatives 2 and 3 may affect vegetation, the environmentally preferable alternative would be the No Action Alternative.

PUBLIC INVOLVEMENT

The public comment period for this project originally occurred from February 14 – March 16, 2013. The EA was posted on NPS's Planning, Environment and Public Comment (PEPC) website. A news release was sent to 40 media outlets, which included newspapers, wire services, radio, TV, and online publications. It was also sent to local, state, and federal agencies, Alaskan military bases, and political officials. In addition, over 100 businesses and organizations received the news release.

The NPS received 63 pieces of correspondence on the Draft EA. Correspondence was received through the PEPC website, email, postal mail, and fax. Correspondence was received from one government agency/representative. Two comments were received from environmental organizations. Two comments were received from local business owners. Two comments were received from groups representing the tourism industry. One comment was received from a group representing dog mushers. The remaining 55 pieces of correspondence were from individuals.

DECISION

The NPS decision is to select Alternative 4 as described above (Plow road on a trial basis for 3-5 years beginning mid-February) along with mitigating measures.

Mitigation Measures

The following mitigation measures apply to the selected Alternative 4.

<u>Visitor Experience and Opportunity</u>

- In order to mitigate the effects to air quality and soundscape, NPS will look into ways to reduce idling vehicles at Mountain Vista Rest Area. (changed from EA. See Errata)
- To ensure safety, the road will be closed during storm events and/or when safe traveling conditions on the road cannot be maintained such as during storms, rain/ice events or high winds.
- In the event the road is closed due to weather, park staff will first ensure no vehicles and visitors are at the Mountain Vista Rest Area.
- Road status will be available on the park website, social media, and by calling the park.
- During normal winters, plowing will begin no earlier than February 1 of each year in order to allow outdoor recreational users use of the road prior to that date

<u>Wilderness Character</u>

- Emergency communication devices will be limited to devices that will not result in additional wilderness impacts.

<u>Wildlife</u>

- If wildlife begin to use the plowed road in winter as a primary travel route, a seasonal reduction in speed limit may be implemented.
- Resource staff will notify Management if a wildlife conflict develops (e.g. migration). Park management and staff will work together to determine if a road closure may be needed to protect wildlife.

- During high snow years wildlife, moose in particular, may be attracted to traveling on the plowed road. Due to speed restrictions it is unlikely animals will be hit by motor vehicles; however, there is the potential for animals to be inadvertently "chased" down the road because of their reluctance to jump over the snow berm. Park staff may monitor the number of incidents of animals unintentionally being chased on the road by motor vehicles and the data will be reviewed at the end of this trial period.

Rationale for the Decision

The selected action (Alternative 4, Plow beginning mid-February on a trial basis) will satisfy the purpose and need of the project better than the other alternatives because it allows NPS to study the impacts of this undertaking prior to committing to plowing on a permanent basis

All action alternatives considered in this plan were designed with the following goals:

- Increase the range of opportunities for winter visitors by adding the option of motorized sightseeing
- Provide increased opportunities for winter visitors to view Mt. McKinley when visiting the park

The purpose of this plan is to maintain the opportunities for physically active and/or backcountry winter recreationalists while at the same time allowing more visitors in vehicles access to an additional nine miles of the Park Road. This plan is necessary to address the needs of visitors to the park in winter when opportunities for them may be limited due to the cold temperatures and reduced daylight. They may visit the kennels; however, the dogs are frequently gone on patrols. Outdoor recreational opportunities such as hiking and snowshoeing are available but require visitors to be prepared for extreme temperatures. The park does get a number of visitors, predominantly from the local area, who cross country ski, skijor, snowshoe, or dog mush into the park. The Park Road is closed in the fall when it becomes snowed in (usually between mid-October and mid-November) and is then re-opened beginning around April 1. Local governments and businesses have expressed an interest in bringing visitors to the park during the winter months for mountain viewing.

While the Minimum Requirement Analysis (MRA) recommended the no-action alternative to maintain wilderness character, that alternative does not meet the purpose and need of the project. Since the impacts to wilderness were minor and indirect, the preferred alternative was chosen.

NPS has estimated costs in Appendix E of the EA. NPS will monitor the costs during the trial period. If the costs result in loss of programs in other areas, the project may end. It is anticipated that revenues from CUAs and entrance fees will help offset costs.

Significance Criteria
The preferred alternative (Alternative 4) 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.

Alternative 4 will have minor adverse impacts to wilderness, and soundscapes. Evaluations also included minor benefits to visitor opportunities and socioeconomics. There will be no impact to cultural resources and vegetation, wetlands and soils.

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

No changes are expected to public health and safety.

(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 environmental effects of Alternative 4 do not have a significant effect on historic or cultural resources, farmlands, wetlands, rivers, or other critical areas. The Park Road is eligible for listing on the National Register of Historic Places. Dog mushing and vehicular use of the Park Road (including plowing) are both activities that have historically taken place on the Park Road during the winter. Plowing the road for an additional 1 month of the year will not adversely affect the Park Road, since it will not alter the features that make it significant or affect its integrity. Alternative 4 will only make the road inaccessible to dog teams for one month more than present practice and does not remove the opportunity for this traditional activity in the park.

(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 is not controversial. The EA was distributed to over 200 agencies, organizations, and individuals for review. The NPS received 63 comments with various concerns, with more commenters supporting the no action alternative over the other alternatives. Many commenters suggested changes to the preferred alternative and some of those suggestions have been incorporated. The environmental analysis concluded that alternative 4 will have no more than minor impacts.

(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 4) do not involve 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.

Alternative 4 allows plowing only on a temporary basis. Another environmental document will be needed to continue the plowing effort past 5 years.

(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.

The actions in Alternative 4 do not significantly contribute to cumulative impacts of any of the impact topics evaluated. These impact topics included visitor experience, wilderness character, soundscape, socioeconomics, cultural resources, and vegetation, wetlands, and soils

(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 has no potential to affect historic properties.

(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. The selected alternative does not adversely affect an endangered or threatened species or its habitat.

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

FINDINGS

The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of park resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park.

The selected alternative complies with the NPS Organic Act and ANILCA the park's General Management Plan and Backcountry 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 Environmental Assessment
for Winter Road Plowing to Mile 12 of the Denali Park Road

The NPS has read and considered all comments received on the draft environmental assessment for the Winter Road Plowing plan. Responses to substantive comments are provided below. 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; (4) make factual corrections; (5) explain why comments do not warrant further agency response (CEQ NEPA Regulations 1503.4). The NPS responded to some non-substantive comments to provide clarification on topics of interest to commenters.

Purpose and Need for the plan

Summary Issue Statement: There is lack of evidence presented in the EA to support the need to increase winter recreation opportunities.

***Response*:** The EA presented that local governments and businesses had requested that the park road be opened in the winter for visitors to view Mt. McKinley. The NPS agrees that more information is needed to have a greater understanding of winter recreation in Denali National Park. The trial period described in the preferred alternative ~~would~~ will allow for valuable data to be collected on the needs and interests of winter visitors and the potential impacts on park resources.

Summary Issue Statement: The scope of the EA is narrowly defined and should be broadened to include other alternatives that would not require plowing of the Park Road.

***Response*:** The No Action alternative considers winter recreation opportunities that do not require plowing the road to Mile 12. Comments that the NPS should consider other locations for meeting the goals of the plan (i.e., mountain viewing from Cantwell) were outside the control of the agency to implement and maintain and therefore not included.

Process

Summary Issue Statement: Commercial interests in Fairbanks and Anchorage met with NPS but the public in those locations were not provided the opportunity.

***Response*:** The NPS was invited to share project information at stakeholder meetings in Anchorage and Fairbanks. During the planning process informational presentations are available to any interested group or individual member of the public.

A public meeting was held on Wednesday, February 22, from 6:00 to 8:00 pm at the Murie Science and Learning Center in Denali National Park with 17 members of the public participating.

Public meetings are just one of the communication methods that may be used by the planning team to reach the broader public. Public meetings have often proven to be less effective than other communication methods that allow people to get the information they desire on their own schedule.

Commercial Use

Summary Issue Statement: The EA lacked information on the type and quantity of commercial activities that may be authorized under this plan.

***Response*:** The NPS believes a trial period will provide clarity and definition of the commercial activities that are viable and appropriate in winter. The commercial transportation of visitors during the trial period is the only commercial activity evaluated and authorized by this review. If at the end of the trial period it is determined to be in the best interest of park resources and the visitor experience to continue the plowing effort, or to authorize other commercial activities, additional compliance will be conducted that would further define and analyze such commercial activities.

Summary Issue Statement: The NPS needs to clearly outline how far commercial vehicles would be allowed to travel into the park (Mile 12 or further?) and what commercial vehicles would be allowed to do during shoulder seasons.

Response: For the trial period, commercial vehicles will be allowed to travel as far as the Mountain Vista Rest Area between February 15th and the start of the regulated visitor season on May 19.

Summary Issue Statement: The EA did not fully explain the fee structure associated with commercial activities.

***Response*:** During the trial period commercial activities will be managed under commercial use authorizations with an estimated annual fee of $200.00. In addition, there will be a $10 per person entrance fee. The Amenity fee for specific activities such as sled dog demonstrations has yet to be determined.

Summary Issue Statement: The NPS should have analyzed the use of an over the snow transport vehicle as an alternative.

Response: As stated in the EA, the use of over the snow vehicles was considered but dismissed for the following reasons: (1) allowing motorized use on the road alongside mushers, skiers, and skijorers may be a safety concern; (2) they would degrade the visitor experience of those participating in those non-motorized activities due to being a loud, slow moving vehicle with limited passenger capacity; (3) over snow vehicles are currently allowed on Stampede out to the Sushana River without an NPS permit but no business has offered these trips which may indicate that it is not a feasible business opportunity. If a business analyzes the feasibility and wants to offer this service, NPS will consider it.

Socioeconomics

Summary Issue Statement: The positive and negative impacts to local and regional businesses were not adequately analyzed in the EA.

Response: The trial period will help to inform on the viability of the business opportunities that may exist and the financial impact to the local and regional economies.

Summary Issue Statement: Unpredictable winter weather conditions that may close the Park Road will impact the business opportunity.

Response: Commercial operators, just like independent travelers, will need to factor in variable weather conditions. The status of the Park Road will be communicated via several means such as the park website, social media, news releases, and phone.

Visitor Experience

Summary Issue Statement: How will the NPS monitor the winter commercial tour operators to ensure a high quality interpretive experience for visitors?

Response: The NPS will not formally evaluate the interpretive experience offered by commercial operators to Mile 12 in the non-regulated visitor season. The NPS may conduct a survey of winter visitors which could include commercial passengers.

Summary Issue Statement: Increasing the distance that is plowed for the enjoyment of motorized sightseers negatively increases the distance for those who want to experience the park without the roads and without the noise of vehicles.

Response: The NPS received many comments during the planning process that visitors going out into the backcountry for recreation may benefit from road plowing activities since they will be able to begin their activities farther into the park. Plowing the road to allow for a motorized sightseeing experience in winter diversifies the visitor experiences available in the park and allows a new group of visitors to enjoy a park experience.

Infrastructure

Summary Issue Statement: During the trial period NPS should commit to no new developments to the Spring Trail or Mountain Vista.

Response: Implementation of the preferred alternative will not allow for new development, other than those previously approved in the 2002 Spring Trail Environmental Assessment. No improvements for Mountain Vista are planned for this project; however, if any temporary improvements are warranted and affordable, NPS may allow such improvements (such as a portable warming hut).

Summary Issue Statement: Consider ways to increase the quality and safety of the visitor experience without adding new infrastructure by researching alternative means of plugging in vehicles, providing emergency communications, and allowing for a temporary warming hut.

Response: The NPS will look into alternative options that do not require new infrastructure during the trial period.

Safety

Summary Issue Statement: Will winter commercial drivers be trained to achieve same level of safety as during summer months?

Response: Since commercial activity will be allowed on the unrestricted section of the Park Road that is open to all vehicles, there will not be an added training requirement for commercial operators.

Summary Issue Statement: Reconsider the mitigation measure that would prevent vehicles from idling at the Mountain Vista Rest Area. A warm vehicle will provide ready shelter for visitors in winter. It's also better for vehicles to warm up in winter conditions before being driven.

Response: In order to mitigate the effects to air quality and soundscape, efforts will be explored and implemented to reduce the need for vehicles to idle at the Mountain Vista Rest Area.

Summary Issue Statement: What will the NPS do if they need to close the road and there are unoccupied vehicles at Mountain Vista?

Response: The Mountain Vista Rest Area will be part of the ranger patrol schedule. A procedure will be in place before the winter season begins to address unoccupied vehicles during storm events that may close the road.

Summary Issue Statement: The Spring Trail as it exists is not a safe place to mush or skijor.

Response: Previously approved trail work listed in the 2002 Spring Trail EA could be implemented in the trial period.

Kennels Operations

Summary Issue Statement: The impacts associated with plowing the road on the NPS kennels operation and independent mushers were not adequately considered in the EA.

Response: The NPS believes that plowing the road four weeks earlier than currently allowed will not cause an unreasonable impact to the Kennels operation or independent mushers. NPS will continually look for ways to improve winter access for these activities throughout the trial period. A workable staging area and trail access for mushers leaving from the Mountain Vista

Rest Area will be reviewed during the trial period. This may include allowing mushers to park at the end of the plowed road near Savage Campground and stage in that area.

Wilderness

Summary Issue Statement: Several areas of the wilderness minimum requirement analysis (MRA) were not adequately analyzed.

Response: The NPS Regional Wilderness Coordinator, Environmental Compliance Coordinator, Regional Director and park staff reviewed the original MRA and felt it was appropriate. Comments received during the public review process were reviewed and considered by the park's Wilderness Resources Specialist and Wilderness Coordinator.
Since the alternative approved does not include any actions in wilderness, no signed MRA is included in this decision. However, the MRA included in the EA was reviewed by park and regional staff, and determined to be an accurate analyses. Although minor edits could have been made to the MRA, they would not affect the analysis.

Soundscape

Summary Issue Statement: Vehicle noise from plowing and sightseeing will create unacceptable impacts to quiet and solitude during winter months.

Response: The NPS will monitor the soundscape during the trial period for unacceptable impacts.

Cost

Summary Issue Statement: The budget numbers in appendix E do not seem to be an accurate representation of needs and alternatives.

Response: The cost estimates were provided by park staff and provide the best reflection of anticipated implementation expenses. Actual costs could be higher or lower than the estimate provided.

Summary Issue Statement: The cost is too high for the small amount of visitors that it will serve and is too dependent on commercial service fees to be viable.

Response: The trial period will allow for increased information and understanding of winter visitation and associated costs.

Wildlife

Summary Issue Statement: The EA failed to analyze any impacts to wildlife.

Response: Wildlife was dismissed as an impact topic for consideration in this plan since there are fewer animals moving about in the affected area and they are used to vehicles on the Park Road that are traveling at a low rate of speed.

Other Resource Topics

Summary Issue Statement: The level of impact analysis is not consistent across the alternatives. The plan states for alternative 4 "The vegetation removal due to previous projects (Savage Alpine Trail, Savage River Loop, Spring Trail and Road work at mile 4.5) did not have a significant cumulative impact on the tens of thousands of acres of taiga or other vegetation resources at the park entrance area." Yet, somehow rerouting the Spring Trail for 1000' feet or moving some boulders will result in negative impacts in alternative 2 and 3?

Response: Impact analysis is done for the project site and cumulatively to include other projects in the vicinity. Alternative 2 was determined to have minor, long-term, adverse impacts due to the 1,000-foot reroute of the Spring Trail. Alternative 3 was determined to have negligible impacts due to relocation of boulders along the Spring Trail.

The vegetation removal due to previous projects did not have a significant cumulative impact on the tens of thousands of acres of taiga or other vegetation resources at the park entrance area. Implementation of Alternative 4 is not expected to contribute towards these cumulative impacts.

New Ideas and Proposed Changes

Summary Issue Statement: Could NPS operate a shuttle service from the MSLC to Mountain Vista for up until March 20 and then allow commercial vehicles to travel past park HQ as a compromise to full commercial access?

Response: NPS will not be operating a shuttle service. However, this is an available business opportunity. Businesses can apply for a Commercial Use Authorization (CUA) if they are interested in providing this service. The viability of operating a shuttle service could be explored during the trial period.

Summary Issue Statement: A counter on the Spring Trail would provide important visitor use data.

Response: A counter on the Spring Trail can be incorporated into the trial period.

Summary Issue Statement: Leave a ribbon of unplowed snow on the side of the road for kennels and ski traffic.

Response: Allowing motorized and recreational use on the road at the same time was dismissed as an alternative due to several concerns. : (1) allowing motorized use on the road alongside mushers, skiers, and skijorers is a safety concern; (2) it would degrade the visitor experience of those participating in those non-motorized activities; (3) a good portion of the paved road is

above the surrounding tundra and the wind blows snow across it. Leaving a ribbon or berm along the edge would cause the wind to eddy snow onto the pavement.

Summary Issue Statement: Consider grooming Riley Creek Campground and other trails in the entrance area for skiing.

Response: Grooming trails on paved sections of campgrounds can be done at any time if the NPS determines it is worthwhile and funding is available.

Summary Issue Statement: Consider opening the road to plowing only if the Spring Trail is usable.

Response: An established date that the road ~~would~~ will be plowed is critical for businesses to utilize the opportunity to bring visitors into the park.

Summary Issue Statement: Consider other commercial enterprises other than motorized sightseeing. These may include guided snowshoeing, fat tire bikes, dog sled tours, equipment rental, etc.

Response: These opportunities already exist for businesses who wish to capitalize on them.

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.

1. **Correction** to page 7 and also in MRA: The BCMP quote should read: "During winter months snow on one lane of the Park Road will continue to be packed from the Headquarters gate to Mile 7 to allow maintenance activities that prevent the buildup of ice on the road in this section. If there is sufficient snow on the spring trail from Headquarters for safe travel by ski, skijor, and dog sled by March 1, the road would be plowed to Savage Campground. Otherwise, the Park Road would remain unplowed until clearing is needed to provide for road opening activities for summer season use. This section of the Park Road will be designated a Backcountry Hiker area during winter months."

2. **Correction** to page 13: The last two mitigation measure should appear under a new heading titled "Common to All Action Alternatives." This does not change the analysis in the EA.

3. **Modification.** Revise the language on page 15: In the description of alternative 4 given in Chapter 2 it should be noted that commercial vehicles will not be allowed past Mountain Vista Rest Area even if the Park Road is open further. This does not change the analysis of visitor experience or socioeconomics.

4. **Modification**. Revise the language on page 15: Under Visitor Experience & Opportunity the mitigation measure for air quality that prevented idling vehicles should be replaces with "In order to mitigate the effects to air quality and soundscape, NPS will look into ways to reduce idling vehicles at Mountain Vista Rest Area." This change will not affect the analysis of soundscape or visitor experience in Chapter 4 of the EA.

ATTACHMENT C

Determination of Non-Impairment
Winter Road Plowing in Denali National Park

The NPS Organic Act of 1916 and 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 Winter Road Plowing environmental assessment for the selected alternative (Alternative 4). The description of park significance in Chapter 1 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/opportunity, socioeconomic resources, or park operations 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.

Wilderness Character
Most of the land within the boundaries of Denali National Park and Preserve meets the above criteria, offering superlative opportunities for wilderness recreation in an environment where human influences are minimal.

However, the association of Denali with wilderness began before the advent of the Wilderness Act, and before the passage of the 1980 Alaska National Interest Lands Conservation Act, which formally designated 99% of the former Mt. McKinley National Park as wilderness. Aside from wider exclusions at campgrounds, administration areas and projected gravel borrow areas, the wilderness boundary generally is set at 150 feet either side of the centerline of the Park Road. In fact, the recognition and protection of Denali's wilderness resource values stretches back to the earliest period of the park's history, creating a lengthy legacy of wilderness management (NPS 2006).

Alternative 4 would result in an increase in vehicular activity on the road for an additional 4 weeks for 3-5 years. The wilderness quality of solitude may diminish for the outdoor recreational visitor. However, this would not result in impairment.

Soundscape

The soundscape between the park entrance and the Savage River area has a distinct set of characteristics. Wind is probably the most common natural sound heard, but bird sounds are frequently audible, and some animals are heard, even in winter. Fresh snow absorbs sounds well and therefore diminishes sound propagation, but loses this absorptive property upon compaction and metamorphosis. Sound – and noise – is more noticeable and travels farther in winter in part because there are fewer competing sounds. Noise in parks per Director's Order #47 is generally defined as an unwanted or undesired sound, often unpleasant in quality, intensity or repetition. Human-induced sounds include voices, though the main such sounds would be from vehicle use.

Alternative 4 allows plowing and vehicular access to an additional 9 miles of road 4 weeks earlier for a trial period. While this will have a long-term, minor adverse impact it would not result in impairment. Soundscape can be studied during the trial period to determine precise impacts.

Cultural Resources

Denali National Park and Preserve is an important area to both the history and prehistory of Alaska. To date over 260 prehistoric and historic sites have been documented in the park, many of which are found along the Park Road Corridor. The Park Road (HEA-00429/ MMK-00171) is itself a historic property and is eligible to be listed on the National Register of Historic Places.

The area of potential effect (APE) has been previously inventoried (Davis 1983), and additional survey was conducted of the proposed trail reroute. The APE includes the Park Road from mile 3.4 to mile 12 (381 acres), and the section of reroute of the spring trail (2 acres) is located 0.75miles due south of the park road at milepost 4.1.

Alternative 4 does not provide for improvements to the Spring Trail beyond those already authorized in the *Environmental Assessment for Construction of a Springtime Dogsled and Skiing Trail from Headquarters to Mile 7 of the Park Road, 2002*. This alternative will not affect historic properties, and DENA will approach National Historic Preservation Act, Section 106, consultation under 36 CFR Part 800.5(3)(b) as "No Historic Properties Affected".

SUMMARY

The level of impacts to wilderness character, soundscape, and cultural resources, anticipated from implementing alternative 4 would 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.