



National Park Service  
U.S. Department of the Interior  
Denali National Park and Preserve

---

## **Environmental Assessment**

### **Milepost 231 Wayside and Trail Connections 2017**





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural and cultural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to assure that their development is in the best interests of all. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

## **Table of Contents**

1. Introduction.....	4
2. Proposed Action.....	4
3. Purpose and Need .....	6
4. Issues Selected for Detailed Analysis .....	8
5. Alternatives .....	10
6. Affected Environment & Impact Analysis.....	14
7. Coordination and Consultation .....	27
8. Selected References .....	28

## **List of Figures**

Figure 1 – Denali National Park and Preserve Project General Location.....	5
Figure 2 – Milepost 231 Wayside Project Location.....	5
Figure 3 – Alternative 2 (Proposed Action), Possible Wayside Design and Trail Network (existing & proposed trails shown) .....	7
Figure 4 – Existing Conditions .....	14
Figure 5 – Existing Conditions- general location for entrance to wayside .....	20

## **List of Tables**

Table 1 – Summary of Alternatives & Direct and Indirect Impacts .....	12
Table 2 – Mitigation Measures and Responsible Party.....	22
Table 3 – Summary of Cumulative Impacts .....	23
Table 4 – Past, Present, and Reasonably Foreseeable Future Actions in MP 231 Vicinity .....	26

## **List of Appendixes**

Appendix A – ANILCA Section 810(a) Subsistence – Summary Evaluation and Findings	
Appendix B - US Department of Transportation (DOT) Act of 1996, 4(f) Letter of Concurrence	
Appendix C – Possible future parking expansion	
Appendix D – ADOT&PF Parks Highway MP 231 Enhancements Overview	

## **1. Introduction**

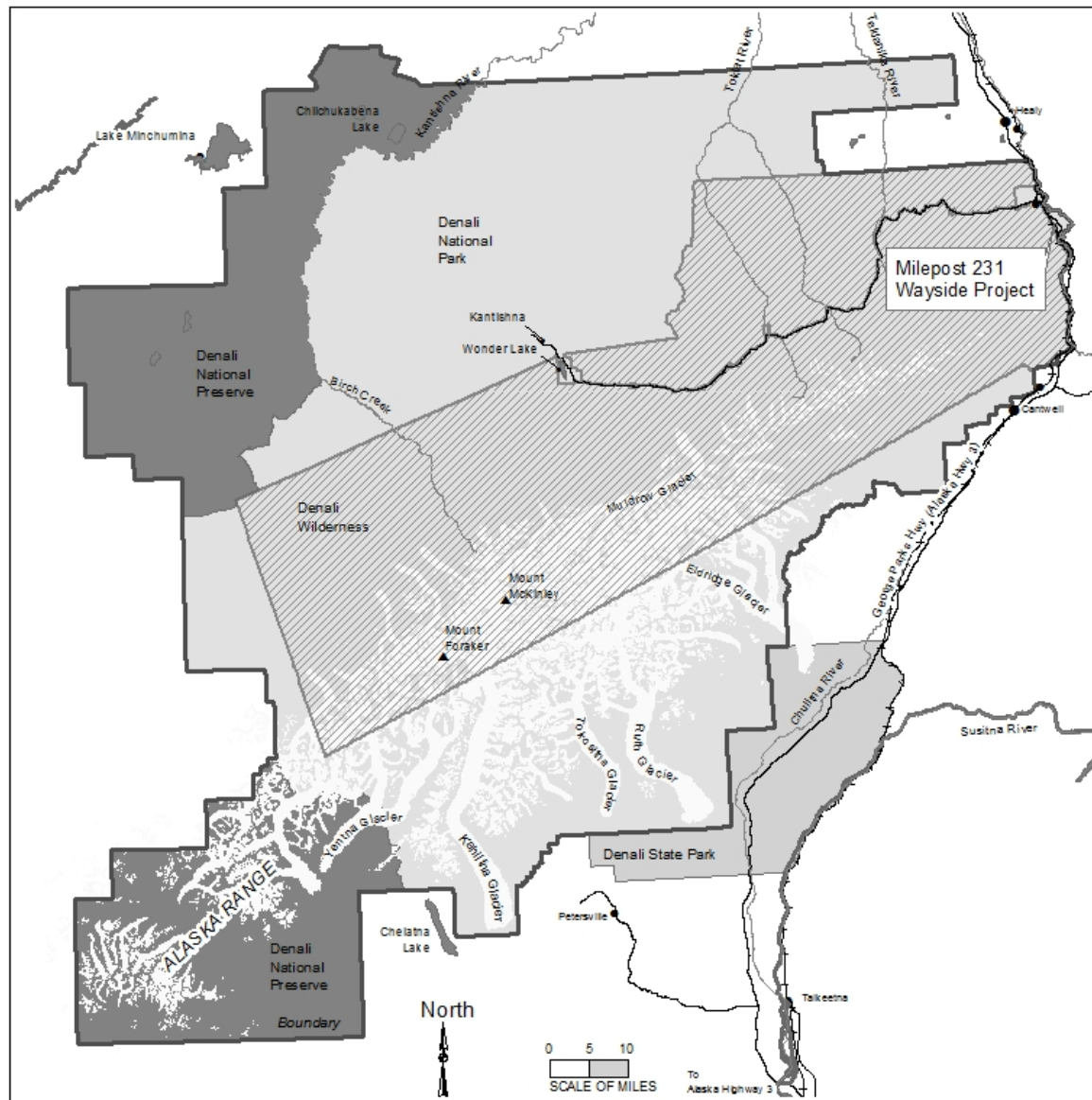
This Environmental Assessment (EA) has been prepared to evaluate potential impacts of the proposed action, construction of a wayside and trail connections at Milepost 231 (MP 231) on the Parks Highway, and a no action alternative. This EA and public comments will inform the decision about whether to proceed with the proposed project. This document has been prepared according to the National Environmental Policy Act (NEPA) of 1969 and regulations of the Council of Environmental Quality (40 CFR 1508.9) and under the guidance of the National Park Service (NPS) DO-12 in the 2015 NEPA Handbook.

## **2. Proposed Action**

The NPS proposes to create and maintain a wayside at the trailhead at MP 231 on the George C. Parks Highway (Parks Highway) and to build trail connections linking the new wayside with existing area trails (Figure 1). The proposed project site is located adjacent to the Parks Highway (Alaska Highway Route 3), approximately six miles south of the main entrance to Denali National Park and Preserve (Denali), just north of the Nenana River where the highway crosses the river at MP 231 (Figure 2). This project is being considered in conjunction with an external action by the Alaska Department of Transportation and Public Facilities (ADOT&PF) and the Federal Highway Administration (FHWA) - Western Federal Lands Highway Division (WFLHD). ADOT&PF plans to enhance safety for pedestrians and other non-motorists in the area by creating a separate, non-motorized lane parallel to the lanes used by automobiles. The ADOT&PF project includes plans to create widened shoulders, and turn lanes to provide for safer flow of traffic in the congested area. The ADOT&PF project is expected to proceed whether or not the NPS implements the proposed action to construct the wayside and trail connections.

The NPS proposed project would disturb approximately 2.5 acres in Denali National Park and Preserve, for construction and operation of a parking area, trailhead, vault toilets, waste receptacles, and other common wayside amenities (Figure 3). The proposed project also includes a short trail connecting the wayside with the Triple Lakes Trail and another connection between the wayside and the Oxbow Trail. The proposed project would provide visitors with safe and designated parking away from the roadside, information about Denali, a safe location for photographing the park entrance sign, and clear access to both the Triple Lakes and Oxbow trails. Future possible uses could include scheduled shuttle bus connectivity and year-round recreation access to area trails.

**Figure 1 – Denali National Park and Preserve Project General Location**

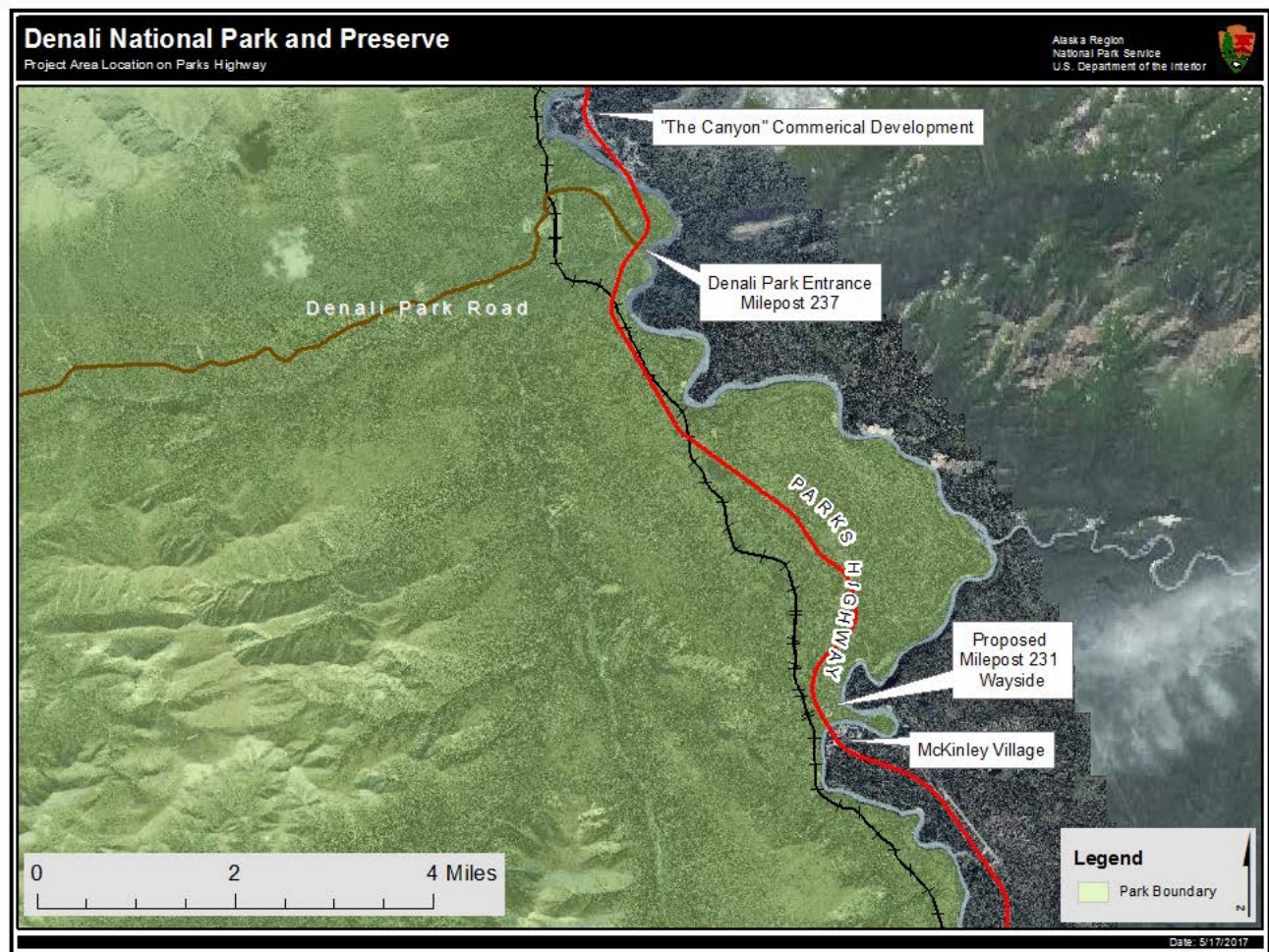


Location in Alaska

**Figure 1**  
**Park/Region**  
**Denali National Park and Preserve**  
*U.S. Department of the Interior • National Park Service*



**Figure 2 – Milepost 231 Wayside Project Location**



### **3. Purpose and Need**

Pedestrian safety has long been a concern at the MP 231 location. The need for the proposed project is to address the public safety concerns for visitors accessing existing trails as well as pedestrians and motorists who wish to photograph the park sign, located at the southern boundary of the park. At present, visitors park along the highway shoulder or in an undeveloped gravel parking area, creating occasional crowding of the highway corridor as well as decelerating and turning traffic in a congested, high speed zone. Additionally, pedestrians accessing the area trails and the park sign walk across or alongside a 65 MPH two-lane highway, creating a hazard for both motorists and non-motorists. The park intends to improve safe access and guide the overall flow of traffic within the entire MP 231 and McKinley Village area, located at Denali's southern entrance.

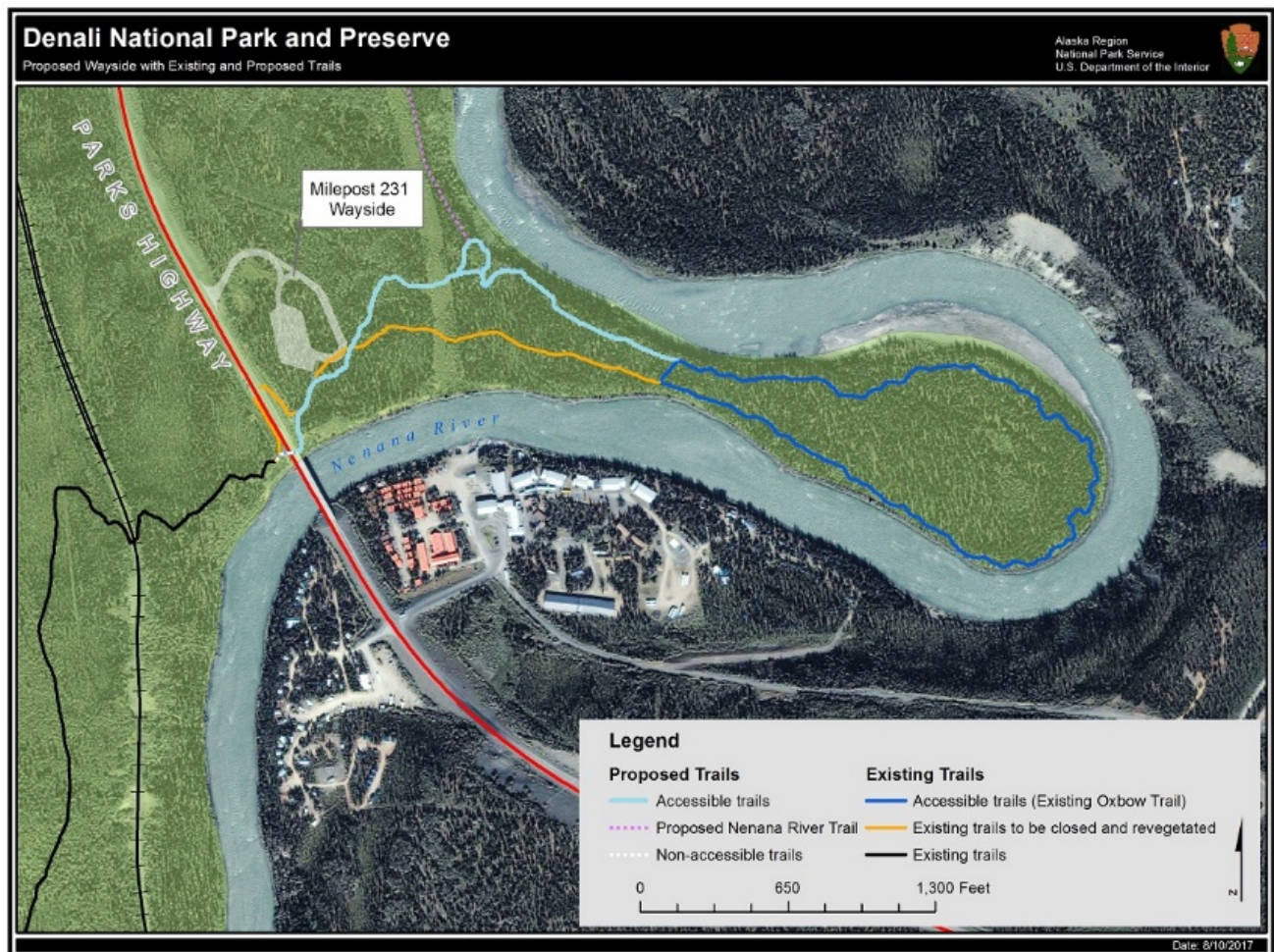
In addition to the need to address unsafe conditions currently impacting park visitors, Denali's General Management Plan (GMP) and Final Entrance Area and Road Corridor Development Concept Plan (DCP) call for expanding day use opportunities in the frontcountry area in recognition of trends toward



increasing tourism, including year-round visitation and new demands for diverse types of recreation. The proposed wayside would serve this purpose by creating a separated designated parking area and trailhead for accessing the Oxbow and Triple Lakes trails. The proposed project would provide accessible facilities built to the standards of the Architectural and Transportation Barriers Compliance Board per the Architectural Barriers Act (ABA). Day use opportunities would be expanded with accessible trails and wayside amenities including restroom facilities and interpretive information about the area's natural resources (Figure 3).

These proposed day use facilities would enhance visitors' opportunities to experience the natural setting in the Frontcountry Developed Area (FDA) found within Nenana River corridor, including views of the eastern Alaska Range and access to the Nenana River.

**Figure 3 – Proposed Wayside and Trail Network**



#### **4. Issues Considered**

Issues identified during the scoping process for this proposed project form the basis of the environmental analysis. A brief description is provided for each issue that is analyzed in this EA. Issues considered but dismissed are also identified and described.

##### **Issues Selected for Detailed Analysis**

###### ***Local Community***

The proposed wayside would be in close proximity to the McKinley Village businesses and hotels, offering expanded recreation facilities for visitors in the area. The wayside could draw additional passing motorists to stop in the area. The new multi-modal facility across the Nenana River would provide a direct connection between McKinley Village, the wayside, and the area trails, providing safe access for pedestrians and cyclists. The wayside would also create the possibility to develop new opportunities for multi-modal connections between the park and other nodes in the community (the “Canyon,” the park entrance, and possibly Healy), by providing a bus stop, bicycle parking, and trailhead access for the Triple Lakes Trail, which currently connects to the visitor center campus in Denali’s entrance area, as well as other trails being considered for the Nenana River area.

###### ***Public Safety and Recreation***

Public safety is a concern in the vicinity of MP 231; parking occurs in undesignated areas within the highway right-of-way (ROW), causing congestion and pedestrian presence on and adjacent to a high speed roadway. The wayside and trail connections would offer off-highway pedestrian access and parking and would provide additional accessible recreation opportunities in the park entrance area.

The proposed project would introduce recreation facilities in the area including restroom and picnic facilities and park information. Recreation facilities would also include proper food and waste storage for mitigating human-wildlife interactions.

###### ***Vegetation and Soils***

Construction of the wayside and trail connections would remove a mixture of white spruce and broadleaf species (approximately 600 trees, six inches in diameter or greater, measured at 54 inches DBH (diameter at breast height)). The proposed project would disturb soils and associated vegetation on approximately 2.5 acres. Localized soil compaction, the creation of impermeable surfaces, and vegetation removal could occur within the proposed clearing area for construction.

###### ***Viewshed***

Clearing approximately 2.5 acres of vegetation and constructing the wayside facilities and trail connections would alter the appearance of the area, resulting in different impacts to user group depending on viewshed perspective. A vegetative buffer along the west edge of the wayside would retain existing vegetation to minimize visual impacts to and from the highway.

###### ***Wildlife***

The project would reduce wildlife habitat by approximately 2.5 acres. The area’s taiga forest provides habitat for avian species as well as large and small mammals that pass through the area. Moose and other large and small wildlife that reside in or pass through the area might likewise be affected by the increased presence of visitors.



### **Issues Eliminated from Further Consideration**

Issues that are not anticipated to have significant environmental impacts were considered but eliminated from further consideration.

### ***Acoustic Resources***

There would be short-term sounds from operating equipment at the site during construction. Once constructed, typical traffic sounds would accompany use by motorists who stop at the wayside. These impacts in an area with common traffic noises would not have a significant impact on the area's acoustic resources.

### ***Air Quality***

Both the Clean Air Act (CAA) of 1977 and NPS 2006 Management Policies require the NPS to consider air quality impacts from their projects. The park is a Federal Class 1 Air Quality Area under the CAA. Air quality is monitored near Park Headquarters and no exceedances of National Ambient Air Quality Standards have been documented within the park. This project would result in low levels of emissions during the construction phase, which would not have a lasting nor significant impact on air quality.

### ***Cultural Resources***

National Park Service staff conducting cultural resource surveys in accordance with the National Historic Preservation Act have not encountered cultural resources in the project area. However, the native history in the area dates back over 13,000 years. During the construction period, an archaeological technician would monitor ground disturbing activities as ground disturbance has potential to affect previously unrecorded historic properties. Should additional cultural sites be located during construction, the project would be halted in the discovery area and cultural resource staff, in consultation with the State Historic Preservation Officer (SHPO) and other consulting parties, would determine the significance of the finding and steps taken to protect cultural information and resources. The project is anticipated to have no adverse effect on historic properties. Consultation with tribal consulting parties is underway.

### ***Environmental Justice***

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low Income Populations*, requires all federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The proposed action would not result in significant impacts to the human population or to the socioeconomic environment of the area, and is therefore dismissed from further analysis.

### ***Indian Trust Resources and Indian Sacred Sites***

The proposed project area within Denali National Park and Preserve does not contain Indian Trust Resources or Indian Sacred Sites.

### ***Subsistence Use***

ANILCA Section 810 requires federal agencies to evaluate the potential impacts of proposed actions on subsistence uses and needs. Federal public lands within Denali National Park, as they existed prior to December 2, 1980, are closed to ANILCA subsistence uses. Denali National Preserve and lands added to Denali National Park on December 2, 1980 are open to subsistence uses. The analysis in Appendix A concludes that none of the proposed actions would result in a significant restriction of subsistence uses.

### ***Threatened and Endangered Species***

The Endangered Species Act requires an analysis of impacts on all federally listed threatened and endangered species, as well as species of special concern. In compliance with Section 7 of the Act, the U.S. Fish and Wildlife Service (USFWS) was consulted. No federally designated threatened or endangered species are known to occur within Denali National Park and Preserve.

### ***Wetlands***

All components of the project area would occur outside of wetlands as well as outside of the floodplains of the Nenana River. The project would not have a significant impact on wetlands. HDR Alaska, Inc. completed a Jurisdictional Determination Report in compliance with the Army Corps of Engineers Wetlands Delineation Manual and the 2007 Supplement. This delineation found no wetlands at the proposed wayside site (2013). A site visit was conducted by an NPS hydrologist (July 2016), who concurred with the findings in the Jurisdictional Determination Report. An additional consultation was completed with an NPS wetlands delineator who examined the proposed trail connections and similarly assessed that the activities would occur outside of wetlands.

### ***Other Resources***

The NPS also considered but dismissed from further evaluation other possible resources that are not known to exist in the area including paleontological resources and native grave sites. Additionally the proposed project site is outside of designated or eligible wilderness and thus impacts to wilderness resources would not occur.

### **Additional Approval(s) Needed to Complete the Project**

The US Department of Transportation (DOT) Act of 1966 § 4(f) requires federal concurrence granting permission for Permanent Improvements and Temporary Occupancy on Denali National Park and Preserve property (See Appendix B).

## **5. Alternatives**

This section describes a no action alternative and the action alternative as well as a brief description of alternatives considered but dismissed.

### **Alternative 1 – No Action**

Under Alternative 1, a wayside and trail connections would not be constructed. Existing conditions and uses would generally continue; existing public safety issues would not be addressed (Table 1).

External Action: ADOT&PF would construct the vehicular and multimodal bridge, which would result in a lack of pedestrian connection to existing trailheads. Such a completion would also direct pedestrian and bicycle traffic to unimproved highway shoulders, potentially exacerbating unsafe conditions. The ADOT&PF project is expected to proceed regardless of the alternative selected by the NPS.

### **Alternative 2 – Develop MP 231 Wayside and Trail Connections (Proposed Action)**

Under Alternative 2, a wayside for day use would be constructed on the east side of the Parks Highway near MP 231. A formal trailhead and trail connections would be constructed along with coordinated pedestrian and bicycle connections.

The NPS would maintain and operate the wayside and trails outside the Parks Highway ROW and to extent agreed upon with ADOT&PF, within the ROW. The proposed design has an overall footprint that would impact approximately 2.5 acres. This acreage includes approximately 2500 linear feet of new trail construction. Initially, the NPS intends to operate the facility during the high season for visitors, May to September, and would later determine if there is a need to expand or reduce the season of operation (Table 1).

The components of the project could include:

- initial clearing and use of the proposed wayside parking area by ADOT&PF as a lay-down yard during construction of pedestrian bridge facilities over the Nenana River (all within proposed footprint for the wayside; approximately two years for completion)
- a paved driveway to access the wayside
- a paved trailhead parking area with parking for approximately 14 passenger vehicles and 11 recreational vehicles or vehicles with trailers
- an impermeable surface separated from the parking area to accommodate wayside amenities (sidewalk area)
- an area east of the current proposed wayside set aside and left without other development to permit additional parking in the future if necessary (approximately 0.5 acres additional acres with accommodation for approximately 18 vehicles). If undertaken, this expansion would require additional NEPA analysis. See Appendix C.
- a bus lane
- a rain covered shelter/bus stop (approximately 300-500 square feet)
- vault toilets
- bear resistant trash and recycling receptacles
- picnic tables
- a covered kiosk with interpretive and trailhead signs for the Oxbow and Triple Lakes trails,
- relocation of the wooden entrance sign, away from the shoulder of the highway, to a location within the wayside which would allow for safe parking while photographing the sign
- a locking driveway gate to both allow for winter use or provide for seasonal closure
- small wayside amenities such as benches and bike racks
- a trail connection between wayside and highway corridor (paved)
- trail connections to connect wayside with an overlook of the Nenana River and with the Oxbow Trail
  - approximately 2000 linear feet, up to 6 feet wide (gravel)
- a short connection trail from the highway bridge underpass to the Triple Lakes Trail
  - approximately 200 linear feet, transitioning from approximately 6 feet wide to 24-36 inches wide (gravel)
- educational and commercial opportunities for guided education and recreation experiences in the project area, including on the existing Oxbow Trail and the proposed trail connections
- educational and commercial opportunities for a bus shuttle service to the wayside

**External Action:** As under Alternative 1, a new vehicular and multimodal bridge would be constructed by ADOT&PF. The ADOT&PF project is expected to proceed whether or not the NPS implements the Alternative 2, to construct the wayside and trail connections.

***Alternatives Considered but Eliminated from Further Consideration***

The NPS considered numerous alternative ideas to address the safety concerns at MP 231. Staff representing the NPS, ADOT&PF, and the local community collaborated to explore effective solutions as part of Value Analysis Study conducted July 27-29, 2015.

Creation of expanded parking immediately adjacent to both sides of the highway by the trailheads and the park entrance sign was considered but dismissed because this solution would add to, rather than diminish, the congestion of traffic and pedestrian near high speed traffic.

Roadside turnouts would create an uncontrolled mix of traffic, which distinctly contrasts with the goal of overall safety enhancement project in the MP 231 area. Additionally, there is concern that the creation of additional parking adjacent to the highway would continue to result in pedestrians walking across or the near the road.

In advance of the reconstruction of the Riley Creek Bridge (completed 2015), there was discussion of adding a wayside east of the Parks Highway across from the entrance to the park road (MP 237). This idea was not carried out for a variety of reasons, including concerns that doing so would add to the congestion already present at that location.

A fully-staffed visitor center facility with utilities, maintenance buildings, and a more expansive footprint was considered for the MP 231 location. This alternative was dismissed in light of feedback from the public and because the Denali Visitor Center and Murie Science and Learning Center (winter visitor center) are located only seven miles away.

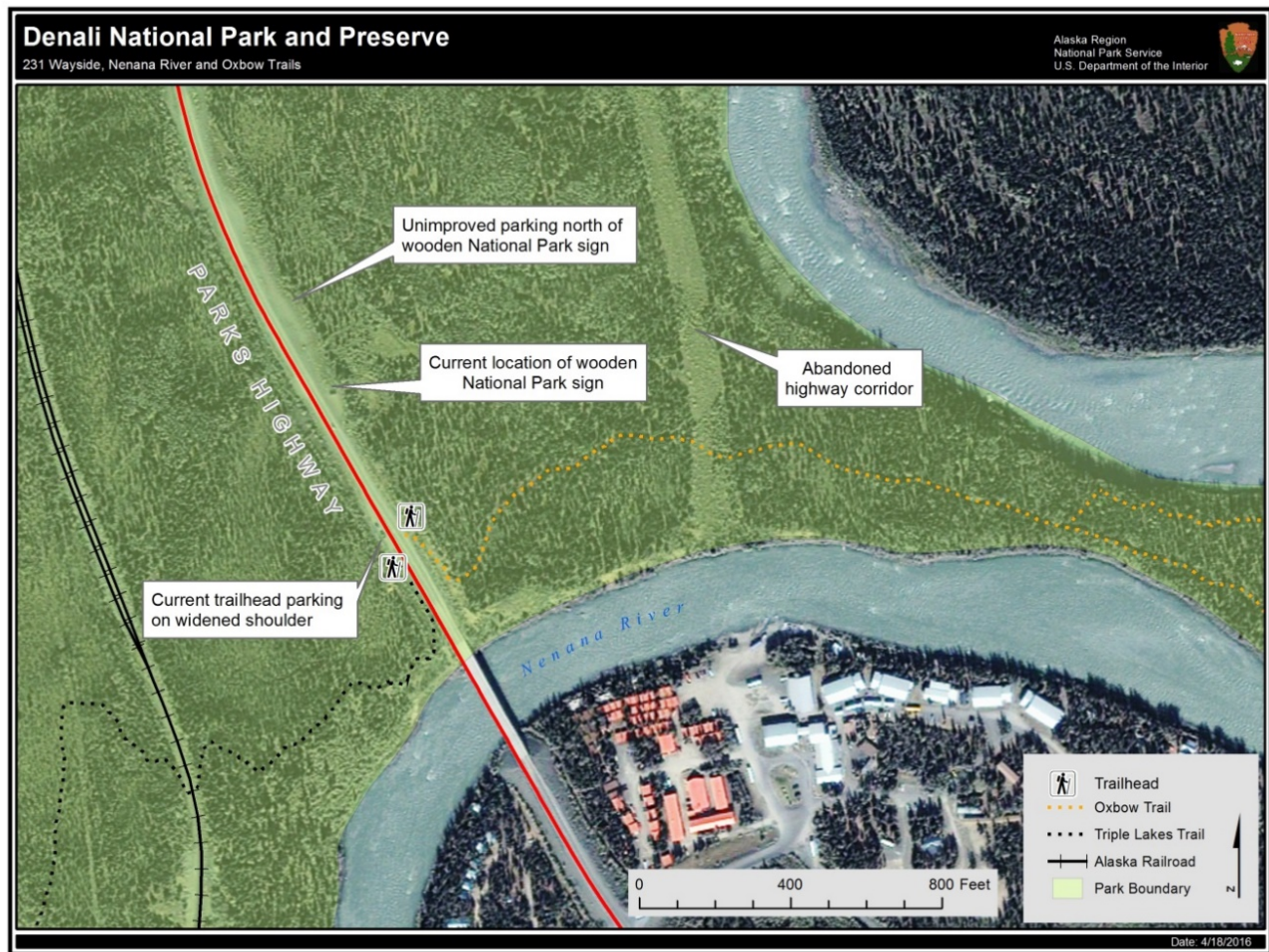
**Table 1 – Summary of Alternatives and Direct and Indirect Impacts**

<b>Action</b>	<b>Alternative 1 – No Action</b>	<b>Alternative 2 - Develop MP 231 Wayside and Trail Connections (Proposed Action)</b>
<b>Summary of Alternatives</b>	<ul style="list-style-type: none"> <li>• No action on NPS lands (except where ADOT&amp;PF ROW passes through the park)</li> <li>• External Action: ADOT&amp;PF bridge replacement and lane expansion project would proceed</li> </ul>	<ul style="list-style-type: none"> <li>• A wayside would be constructed and could include a paved driveway, trailhead parking, toilets, a bus shelter, and other wayside amenities</li> <li>• Approximately 2500 feet of trail connections would be built and would vary in width from 3 feet to 6 feet wide</li> <li>• Approximately 2.5 total acres of park land would be altered in creating the wayside and trails</li> </ul>
<b>Direct &amp; Indirect Impacts to Local Community</b>	<ul style="list-style-type: none"> <li>• No action on NPS lands</li> <li>• External Action: Reduced parking options: Broadened shoulders currently</li> </ul>	<ul style="list-style-type: none"> <li>• Pedestrian and traffic patterns would be delineated to correct safety deficiencies</li> <li>• Creation of recreation facilities, resulting in expanded opportunities for personal, educational, and commercial recreation pursuits</li> <li>• Multi-modal connection opportunities created</li> </ul>



Action	Alternative 1 – No Action	Alternative 2 - Develop MP 231 Wayside and Trail Connections (Proposed Action)
	used for parking eliminated by ADOT&PF's bridge project	<ul style="list-style-type: none"> <li>• (Short-term) Increased construction traffic and possible delays; patronage of local businesses by construction workers</li> </ul>
<b>Direct &amp; Indirect Impacts to Public Safety and Recreation</b>	<ul style="list-style-type: none"> <li>• Public safety concerns would not be addressed</li> <li>• A less developed recreation setting would persist</li> <li>• External Action: Parking would be more limited than current condition and area trails would be more challenging to access</li> </ul>	<ul style="list-style-type: none"> <li>• Formation of a more developed recreation setting with trailhead amenities and new trail connections</li> <li>• Public safety deficiencies corrected by separating motorized and non-motorized traffic patterns</li> <li>• Establishment of a sense of welcome at Denali's south entrance with the introduction visitor amenities and interpretive and information signs</li> <li>• Increased NPS presence in the area to patrol and maintain the site</li> <li>• (Short-term) Parking options would be reduced and temporary trail closures and re-routes could interrupt recreation while both ADOT&amp;PF and the NPS undertake construction in the area.</li> </ul>
<b>Direct &amp; Indirect Impacts to Vegetation and Soils</b>	<ul style="list-style-type: none"> <li>• External Action: Additional foot traffic from completed ADOT&amp;PF bridge could damage vegetation and create additional informal trails</li> </ul>	<ul style="list-style-type: none"> <li>• Clearing of approximately 2.5 acres of vegetation</li> <li>• Creation of new vegetated edges; openings for early successional species</li> <li>• Disturbance of approximately 2.5 acres of soils, including creation of impermeable and semi-permeable surfaces with reduced water absorption</li> <li>• External Action: Possibility for new informal trail formation (also known as "social trails")</li> </ul>
<b>Direct &amp; Indirect Impacts to Viewshed</b>	No change	<ul style="list-style-type: none"> <li>• Entrance road and parts of wayside visible from highway and other proximal locations</li> <li>• Parking options adjacent to the highway eliminated from viewshed</li> <li>• Creation of new visitor opportunities to experience the aesthetics of the Nenana River viewshed.</li> </ul>
<b>Direct &amp; Indirect Impacts to Wildlife</b>	No change	<ul style="list-style-type: none"> <li>• (Short-term) Potential additional impacts to wildlife such as displacement or otherwise altered use during the construction period, related to noise and activity of equipment use and rapid changes to habitat.</li> <li>• Alteration and/or removal of approximately 2.5 acres of wildlife habitat.</li> <li>• Increased human presence on trails and at wayside.</li> </ul>

Figure 4 – Existing Conditions



## **6. Affected Environment & Impact Analysis**

This section briefly describes the existing conditions (Figure 4, above) and evaluates the impacts that could result from the alternatives posed. The analysis considers possible direct and indirect impacts and includes possible mitigation measures.

### **Alternative 1 – No Action**

Under the No Action alternative, a wayside would not be constructed at MP 231 and new trail connections would not be built. Existing public safety issues would not be addressed as visitors would likely continue to park on or near the highway shoulders to access trailheads and take photographs. The gravel pull-out north of the existing welcome sign is in the ADOT&PF ROW, has a steep entrance shoulder, and is not improved or delineated with markings. No amenities are available in the pull-out and access to the park sign is via a short informal trail adjacent to the highway. The tendency for pedestrians to park close to passing traffic and cross the highway on foot would not be addressed (see Table 1).

No action would be taken to implement management goals identified in the GMP and DCP to provide expanded visitor services in the entrance area. No new recreation opportunities would be created. Alternative 1 would not generate direct or indirect effects to the local community, vegetation and soils, or the viewshed.

External Action: The new vehicular and multimodal bridge would be constructed by ADOT&PF. As part of this safety enhancement project and changes to the bridge and associated traffic lanes over the Nenana River, ADOT&PF plans to eliminate the areas currently used most frequently for trailhead parking, resulting in diminished space and opportunities for parking. Improved pedestrian access across the Nenana River would draw more pedestrians to the area, while a safe crossing of the Parks Highway to access the Triple Lakes Trail would not be provided.

### **Alternative 2 – Develop MP 231 Wayside and Trail Connections (Proposed Action)**

A new wayside with associated trail connections would be constructed on NPS land. This construction would comply with best management practices and implementation of the mitigation measures. The NPS would be responsible for ongoing monitoring and protection of resources in the MP 231 area as elsewhere throughout the park. Refer to Section 5 for a complete description of Alternative 2 and Table 1 for a summary of the alternatives.

External Action: Under Alternative 2, the ADOT&PF would construct a new bridge, as in Alternative 1. Changes to pedestrian access and parking would be the same as under Alternative 1.

## ***Local Community***

### ***Affected Environment***

The local community, McKinley Village, is comprised of numerous businesses, including hotels, shops, and tourism based companies as well as a residential neighborhood. The Parks Highway, the Alaska Railroad, the regional service intertie (cross-country electrical lines), and aircraft accessing the McKinley Park and McKinley Village airstrips pass through the area. During the summer months, McKinley Village is a busy place with pedestrians and automobiles comprising local traffic as they move between attractions. Denali National Park is the main tourism draw for these businesses.

### *Direct and Indirect Impacts*

Completion of the project would enhance the flow of pedestrian and vehicular traffic in the area and would provide expanded opportunities for recreational and commercial use of the wayside and area trails by area residents and businesses. The proposed project could increase multi-modal connectivity within McKinley Village and with the broader community by providing a bus shuttle stop and bike parking facilities. During construction, the proposed project may increase business for local lodges and restaurants resulting from construction crews working in the area and may create temporary changes to traffic patterns, although most of these impacts would result from the larger highway bridge replacement project in the general area.

In summary, the local community would experience direct and indirect impacts with the new recreation attraction in the area, including short-term impacts due to the presence of construction crews and lasting impacts resulting from longer visits by park visitors and expanded recreational opportunities.

### *Mitigation Measures*

In order to diminish impacts during construction, the NPS would work with ADOT&PF and their contractor to maintain a parking option in the general vicinity and to keep area trails open to hikers, via alternative approaches. Using the wayside footprint as a staging area would permit storage and construction activities to occur at a safe location without increasing the impacted acres from the overall project. The NPS, ADOT&PF, and the project contractor would collaborate on conditions to ensure that staging at the wayside occurs away from the highway. All contractor activities would be carried out with strict adherence to NPS food and waste management requirements as well as stipulations for reporting any newly discovered cultural or natural resources. The ADOT&PF, NPS, and the project contractor would notify area business and the community about the project, particularly with respect to temporary trail closures and re-routes and any changes to trailhead parking. The mitigation measures and responsible parties are identified in Table 2.

### *Public Safety and Recreation*

#### *Affected Environment*

The proposed project area is located on the east side of the highway in the vicinity of the Oxbow Trailhead, a wooden national park entrance sign, and the Triple Lakes Trailhead. Hikers accessing either trail typically park on the widened shoulder on the west side of the highway at the Triple Lakes Trailhead, with occasional parking occurring at the gravel pull-out north of the wooden park sign (east side of the highway). ADOT&PF plans to eliminate the areas currently used most frequently for trailhead parking as part of bridge construction, resulting in diminished space and opportunities for parking as is currently done on the shoulders of the highway.

Other hikers and photographers arrive via area hotel shuttles or on foot. Photographers of the wooden entrance sign access the area on foot via the highway bridge over the Nenana River as well as in personal vehicles.

### *Direct and Indirect Impacts*

The proposed action to construct a wayside would improve public safety in the area. The wayside would develop a parking area separated from the highway. A safe, designated parking area and trailhead would



eliminate the need for informal parking on highway shoulders as well as pedestrian crossings of the highway.

Alternative 2 would impact park visitors by creating a sense of arrival where many visitors first enter Denali. The wayside would provide safe, convenient access for day users and photographers. Facilities would include an accessible trail and overlook destination, interpretive signs, and picnic and food storage facilities designed to minimize wildlife-human interactions.

During construction, the wooden welcome sign would be temporarily removed and the shoulders currently used for parking would be closed. The Oxbow and Triple Lakes trailheads would be occluded by construction activities. The NPS would work with ADOT&PF to create temporary routes to access area trails. Construction in the area would likely occur over two construction seasons.

Education and commercial partners who currently offer guided hiking on the Oxbow and Triple Lakes trails may experience an interruption to current parking and guiding practices. Current recreationists who enjoy the relative obscurity of the Oxbow and Triple Lakes trails could be impacted by changes to the area. The recreation setting would be changed with the introduction of additional facilities and additional visitors to the area.

The project could increase use of the trailhead location by attracting passing motorists and other park visitors, including illegal overnight camping. The presence of NPS staff would increase in the area to patrol and maintain the site.

In summary, short-term impacts during the construction of the new highway bridge and the wayside would impact recreation by temporarily limiting or altering use of the area. Long-term impacts to public safety and recreation would include improved public safety in the vicinity of the highway, additional recreation facilities and types of recreational opportunities, and a change to a more developed recreation setting.

#### *Mitigation Measures*

The ADOT&PF would work closely with its contractor to schedule disruption during the “shoulder season,” as much as possible, minimizing impacts whenever possible to the high season for tourism (May-September). Efforts would be made to keep the unimproved gravel lot (east side of the highway, north of the current wooden entrance sign location) available as much as possible during the construction period. The NPS would construct temporary trail connections to permit access to area trails while ensuring safe bypass of the construction zone for area hikers. These temporary trail connections would be closed and revegetated following project completion.

To protect visitor safety in the construction zone, the NPS and ADOT&PF would publicize temporary restrictions and post signs regarding any impacts to Oxbow and Triple Lakes Trail use. The NPS would work with education and commercial partners to reduce impacts to guided hiking during the construction period and to advise partners of future commercial opportunities afforded by the new facilities.

Once complete, the NPS would patrol the newly created facilities to ensure public safety in the area. Signs prohibiting overnight camping and campfires would be posted and a lockable gate would be installed near the driveway entrance off of the Parks Highway. The NPS would monitor use of the area in

order to assure resource protection and to provide recreational opportunities that contribute to the visitor enjoyment of park resources.

## ***Vegetation and Soils***

### *Affected Environment*

The proposed project site is generally vegetated by a mixed white spruce broadleaf forest, a taiga forest community comprised largely of white spruce and aspen along with willows, Labrador tea, blueberry, low bush cranberry, and sphagnum moss on the forest floor. A short section (approximately 200' linear feet) of the proposed trail connections would cross the vacated highway corridor, a disturbed open tall shrub community with willows, alders and dwarf birch. The project site contains generally well-drained, upland soils (non-hydric soils; gravel and boulders with organics in the top 2-3 feet) on a bluff overlooking the Nenana River Valley.

### *Direct and Indirect Impacts*

Direct impacts to the site include the clearing of approximately 2.5 acres of trees, shrubs, and ground cover. New vegetated edges would be created around the perimeter of the wayside which could impact habitat and would promote revegetation of early successional species.

Disturbance of approximately 2.5 acres of soils and the introduction of impermeable surfaces in the area could impact drainage by changing sheet flow and reducing water absorption. Additional use of the area could result in new informal trail formation proximal to the wayside and amidst the maintained trails.

In summary, direct and indirect impacts to vegetation and soils would include removal of mixed white spruce broadleaf forest, increased soil compaction, and reduced surface water absorption in the approximately 2.5 acre project area.

### *Mitigation Measures*

The wayside would be designed to retain as many trees as possible, including a mostly undisturbed island centered in the parking area of overstory trees within the project site. Project design of the wayside would protect soils by providing for effective drainage to prevent erosion, promote controlled sedimentation to help manage hydrocarbon and particulate runoff and by providing for vault toilet construction to contain waste materials and prevent contamination.

Trail connections would be routed to avoid as many trees as possible and revegetation would occur where possible (e.g. reclaiming abandoned informal trails). The NPS would implement revegetation efforts and lay-out trail patterns to discourage informal trail formation. Trail design would include drainage structures to avoid erosion of area soils.

Large trees (over 6 inches DBH) removed during construction would be retained by the NPS for administrative uses such as building material or firewood for patrol cabins. In the event that there is not administrative need for the timber, the large trees would be made available to qualified subsistence users in local communities for use as firewood. Some trees (less than 6 inches DBH) may be temporarily removed by park staff and transplanted to encourage sustainable renewal at forest edge.

Any equipment and materials stored by the ADOT&PF and its contractor must be cleaned in advance of storage or use on park lands to prevent the introduction of non-native vegetation.

## ***Viewshed***

### ***Affected Environment***

The project site is located in a viewshed that includes distant views of the Alaska Range, the surrounding forest and Nenana River Valley, the Parks Highway, and commercial and residential buildings in McKinley Village (Figure 5).

### ***Direct and Indirect Impacts***

The wayside entrance road would be visible to passing motorists. Portions of the wayside, in particular roofs of the structures, might be visible from parts of McKinley Village and to passing motorists and other recreationists in the area. By virtue of eliminating parking options adjacent to the highway, the removal of automobiles from highway shoulders could improve the viewshed where motorists and visitors enter the park. A new visitor opportunity to experience the viewshed of the Alaska Range and Nenana River Valley would be created at both the wayside location and on the proposed trails.

During construction, the viewshed could be additionally impacted by the use of the project area for staging of construction materials and heavy equipment.

In summary, short and long-term impacts would result from the removal of vegetation and from the introduction of new hardened surfaces and structures at the wayside and trails, yielding beneficial and adverse impacts for the MP 231 viewshed experience.

### ***Mitigation Measures***

The project would be designed to retain a vegetative buffer between the wayside and the highway and a vegetated island would be located within the wayside. Structures at the wayside would be constructed using materials and colors found in the surrounding landscape, but would still be visible at locations within and outside of the project area. The trails would be mostly located within the forest canopy.

**Figure 5 – Existing conditions - general location for entrance to wayside**



## ***Wildlife***

### ***Affected Environment***

The project takes place in the taiga forest adjacent to the Nenana River corridor, which provides habitat for avian species as well as large and small mammals who may reside or pass through the area.

### ***Direct and Indirect Impacts***

Direct impacts to the site include the removal and alteration of approximately 2.5 acres of wildlife habitat. This action could impact wildlife behavior by eliminating or changing the habitat from its current use, including possible travel through or denning by different wildlife species. The creation of impermeable surfaces and human presence repels use by some species and attracts use in others, resulting in possible changes to patterns of movement. Indirect impacts could result from increased human presence in the area generally, including more use of the existing Oxbow and Triple Lakes trails.

There may be additional impacts to wildlife during the construction period during which the sounds and activity related to equipment use and rapid changes to the habitat could displace or otherwise alter wildlife use of the area.

In summary, direct and indirect impacts wildlife habitat could alter behavior among mammalian and avian species known to frequent the area by removing habitat and adding developed features such as trails, trash receptacles, and shelters.



### *Mitigation Measures*

During construction, NPS and AKDOT&PF personnel would follow established guidelines in the park's bear-human conflict management plan, which requires the use of bear resistant containers for food and refuse. The completed wayside would be designed with features known to minimize relative impacts to wildlife, including information panels with guidance for human behavior in wildlife habitat, grates to prohibit avian nesting in vault toilets, and wildlife resistant trash and recycling bins.

The project would occur in habitat where migratory birds and golden eagles could establish nests. While no nesting sites have been identified in the project area, nest surveys have not been conducted in the area. At a minimum, no clearing or other disturbance to identified avian habitat would occur between May 1 and July 31<sup>st</sup> each year, in compliance with the Migratory Bird Treaty Act (MBTA). Before commencing construction, the NPS and ADOT&PF would consult with avian ecologists to conduct site visits as some nesting occurs outside of the summer months. Additionally, all vegetation that is cut or altered is to be removed from the site as soon as possible, including brush piles which can create new nesting habitat. If any nesting sites are encountered during construction, all activity would stop and avian ecologists would be notified to make a case-by-case determination about whether construction may precede.

**Table 2 – Mitigation Measures and Responsible Party**

Mitigation Measure	NPS	ADOT &PF
Vegetated buffer maintained between highway and wayside	•	•
Re-vegetation measures undertaken to close existing informal trails and to mitigate any unnecessary short-term disturbance to vegetation	•	
Structures at wayside constructed with materials reflective of the natural setting	•	•
Approximately 2200 linear feet of rails routed to avoid trees where possible, surfaced with gravel (Approximately 200-400 feet of paved trail connection through highway ROW per ADOT&PF's specifications)	•	•
All facilities designed to facilitate functional drainage patterns	•	•
Patrol the area to ensure resource protection during and after construction	•	
During construction activities, maintain alternative parking and access to the area trails, with a focus on the safety of area users and laborers	•	•
During construction activities, coordinate and communicate with community businesses, including commercial and education partners impacted by modifications to trail use and parking	•	•
During construction activities, minimize highway traffic delays and limit activities to shoulder season as much as possible		•
During construction activities, minimize noise, light, and other impacts to local community	•	•
Construction site to be maintained in accordance with NPS requirements for food storage, waste removal, cultural resource protection, protection against wildfires, and the prevention of non-native species introduction through proper cleaning of all equipment and materials	•	•
Vegetation clearing compliant with Migratory Bird Treaty Act	•	•
Wayside design to include features for minimizing impacts to wildlife (e.g. measures such as wildlife resistant facilities)	•	•

***Cumulative Impacts***

The cumulative impacts discussion considers the contribution of the proposed action to the past, present and reasonably foreseeable future actions in the project area. Past and present actions that have affected the project area include the presence of the Parks Highway and Alaska Railroad, the ongoing expansion of the lodging and commercial facilities located across the Nenana River to the south of the project site, the rehabilitation of the Triple Lakes Trail, the creation of the trails in the entrance area near Riley Creek as well as the Oxbow Trail, the geotechnical investigation at the MP 231 wayside site, and the general increase in visitors to Denali National Park during the past 20 years. Table 3 contains summary of the reasonably foreseeable future actions and Table 4 contains a summary of cumulative impacts.

Reasonably foreseeable future actions in the area include planned upgrades to the existing Oxbow Trail to meet accessibility standards, the proposed trails along the Nenana River, possible expansion of the wayside footprint (Appendix C), increased winter and shoulder-season recreation opportunities and amenities, possible expanded community transit service with a stop at the wayside, and ADOT&PF's planned enhancements to the vehicular bridge and traffic pattern at MP 231, as previously discussed (further details in Appendix D).

**Table 3 – Past, Present, and Reasonably Foreseeable Future Actions in MP 231 Vicinity**

Action	Past Action	Present Action	Reasonably Foreseeable Future Action
Alaska Railroad	•	•	
Parks Highway – current corridor	•	•	
Parks Highway – abandoned corridor	•		
McKinley Village – lodges and commercial area	•	•	•
Residential Development	•	•	•
NPS Trail Construction – Oxbow and Triple Lakes	•	•	
NPS Trail Construction – Oxbow Accessible Trail, Nenana River Trail, entrance area trails near Riley Creek			•
Expansion of wayside footprint (additional NEPA required)			•
MP 231 Bridge Replacement Project			•
Geotechnical Investigation including vegetation removal, at MP 231	•		

***Local Community***

The local community's development in McKinley Village began around 1985 and has continued to grow, beginning as a residential area that now includes development of multiple types. Past and present actions have created a developed setting in the Denali entrance area and the nearby gateway communities that support a broad range of nature-based tourism. The reasonably foreseeable future actions are generally estimated to be small in scale and similar in development type, also supporting nature-based tourism in the Denali entrance area.

The proposed action would add an approximately 2.5 acre visitor facility to the Denali frontcountry, with trail connections to McKinley Village. The proposed scale and type of development is aligned with the Denali GMP and DCP and is synchronous with the tourism-based development and seasonal activity in McKinley Village and the other gateway communities near Denali. The proposed action is not likely to alter the character of local communities.

***Public Safety and Recreation***

The Denali entrance sign has enticed visitors to stop and the topography in the vicinity of the entrance sign has accommodated informal parking. The resulting congestion and conflicts between pedestrians and highway traffic in MP 231 area is a public safety concern for area businesses, the trucking industry, ADOT&PF, and the NPS. The reasonably foreseeable future actions would not likely exacerbate congestion and safety issues in the vicinity of MP 231, but visitor use in the Denali entrance area could continue to increase over time.

The addition of the wayside would address these safety concerns and would reduce unsafe conditions by removing pedestrians and parked vehicles from the highway corridor. The improved management and flow of traffic at MP 231 would add to the overall effective movement of traffic and pedestrians in the McKinley Village area.

The addition of lodging and tourist facilities south of the project area continues to introduce additional visitors who recreate in Denali and the gateway communities. Visitors to the area currently park, hike, bike, ski, photograph, berry-pick, and picnic in the area. The construction of the wayside and trail would allow these activities to continue and would contribute additional opportunities for accessible recreation, interpretation, and picnicking. With few accessible recreation opportunities available in Denali, the contribution to cumulative effects on recreation resources would be small, but beneficial.

### ***Vegetation and Soils***

Over the past few decades, development in the vicinity of the proposed project has disturbed soils extensively outside of the park and has removed hundreds of acres of vegetation for the construction of facilities such as areas hotels, transportation corridors, parking areas, trails, and residences. This development has been accompanied by increasing numbers of visitors in the area, which corresponds with future plans for other visitor accommodations whose construction may also remove vegetation and impact soils. Reasonably foreseeable future activities include ADOT&PF's plans for replacement of the highway bridge at MP 231 (removes approximately 2.5 acres vegetation for the bridge construction, separate from the proposed wayside and trails) and the trails being considered in the Nenana River corridor and Denali entrance area.

In the context of the past, present, and reasonably foreseeable human activity and development near the MP 231 location, the removal of approximately 2.5 acres of vegetation and compaction of soils would constitute a small contribution to the cumulative impacts on vegetation and soils. Native vegetation would continue to dominate the landscape and native soils would persist in the area. Undisturbed native vegetation and soils would continue to function within typical limits and trends in the area.

### ***Viewshed***

The viewshed is expansive with views of the Alaska Range in all directions. The predominant view from the project area is of undisturbed taiga and alpine terrain. In the more immediate vicinity, the highway and highway bridge, the railroad, and the numerous buildings visible south of the project area are prominent on the landscape. The reasonably foreseeable future actions would contribute additional developed features, including trails in the Denali entrance area, bridge and road reconstruction within the highway ROW, and residential and commercial buildings in the gateway communities. The proposed developments would likely be congruent with existing development in these areas.

The proposed project would impact the viewshed within Denali by reducing unplanned vehicle parking adjacent to the highway where many visitors enter the park. The project would conversely alter the viewshed in the vicinity with the removal of vegetation and introduction of wayside amenities. The approximately 2.5 acre wayside with signs and a few simple structures would be screened from the road with vegetation. It would be small in scale relative to the natural landscape and compared to the scale of commercial and residential development south of the river. The scenic resources of the area would not be substantially altered with the addition of the wayside development.

### ***Wildlife***

The Denali entrance area and the nearby gateway communities have experienced extensive development in recent decades, resulting in the removal and alteration of wildlife habitat. These changes in land use have introduced expanded human use, including pedestrian and vehicular traffic, construction of tourist and residential buildings, and associated facilities such as waste receptacles and gardens. The reasonably foreseeable future activities would continue this development trend in the area with respect to wildlife habitat. Future activities, as previously mentioned, would likely include road construction, bridge replacement, trails, and tourism amenities.

The approximately 2.5 acre wayside and trail connection would constitute a small contribution to the cumulative effects to wildlife habitat in the area. The small scale development of wayside facilities would be located within the Denali entrance area and adjacent to the developed setting in McKinley Village. MP 231 is surrounded by thousands of acres of taiga forests and alpine settings that provide widespread wildlife habitat. Wildlife habitat would continue to be abundant throughout the area and would continue to function within typical limits and trends.



**Table 4 – Summary of Cumulative Impacts**

<b>Action</b>	<b>Alternative 1 – No Action</b>	<b>Alternative 2 - Develop MP 231 Wayside and Trail Connections (Proposed Action)</b>
<b>Local Community</b>	None	<ul style="list-style-type: none"> <li>• A small development in an area surrounded by extensive development and existing tourism-based facilities</li> </ul>
<b>Public Safety and Recreation</b>	<ul style="list-style-type: none"> <li>• The MP 231 area would still be altered by the ADOT&amp;PF project planned for the area, including the removal of the current trailhead parking area at Triple Lakes Trail</li> <li>• Pedestrian trail connections would be incomplete and would not provide facilities to minimize pedestrian traffic on the highway.</li> </ul>	<ul style="list-style-type: none"> <li>• Off-highway parking and off-highway trailhead access on NPS lands (facilities designed to complement ADOT&amp;PF's safety enhancement project)</li> <li>• Additional opportunities for accessible multi-use and multi-season recreation in an area with existing recreation infrastructure</li> </ul>
<b>Vegetation and Soils</b>	<ul style="list-style-type: none"> <li>• Additional foot traffic from completed ADOT&amp;PF bridge could damage vegetation and create additional informal trails</li> </ul>	<ul style="list-style-type: none"> <li>• 2.5 additional acres of vegetation clearing and soil compaction adjacent to existing developments</li> </ul>
<b>Viewshed</b>	None	<ul style="list-style-type: none"> <li>• Reduction in vehicles parked adjacent to the highway at park entrance; reduction in traffic congestion and safety issues</li> <li>• Entrance road, additional vegetation clearing, and additional small structures adjacent to existing developments; vegetative screening between proposed site and primary travel route</li> </ul>
<b>Wildlife</b>	None	<ul style="list-style-type: none"> <li>• 2.5 additional acres of changes to wildlife habitat in area adjacent to existing infrastructure and facility development</li> <li>• Increased human presence in an area with substantial human use</li> </ul>

## **7. Coordination and Consultation**

- Andrea Blakesley, Denali, Environmental Specialist
- Brooke Merrell, NPS Alaska Region Planning and Compliance Manager
- Carl Heim, ADOT&PF Project Manager for MP 231 Enhancements Project
- Carol McIntyre, Denali, Ornithologist
- Erik Hendrickson, Denali, Engineer (retired)
- David Jensen, ADOT&PF Engineer
- Joan Kluwe, NPS Alaska Region Environmental Protection Specialist
- Laura Phillips, Denali, NPS Avian Ecologist
- Lauren Little, ADOT&PF Previous Project Manager for MP 231 Enhancements Project
- Kevin Doniere, NPS Landscape Architect
- Miriam Valentine, Denali, Chief of External Affairs
- Molly McKinley, Denali, Outdoor Recreation Planner
- Pat Owen, Denali, Biologist
- Paul Burger, NPS Hydrologist
- Paul Schrooten, NPS Landscape Architect, Regional Transportation Program Manager
- Phoebe Gilbert, Denali, Archaeologist, Section 106 Coordinator
- Sarah Stehn, Denali, Botanist
- State Historic Preservation Office, State of Alaska
- Steve Carwile, Denali, Compliance Officer, Wetlands Delineator (retired)
- Ted Swem, U.S. Fish and Wildlife Service, Endangered Species Coordinator, Ecological Services office.

### **Public Scoping**

The National Park Service hosted a multi-project open house on November 18, 2015, which included an informational station regarding the proposed Wayside (18 attendees). ADOT&PF hosted five open houses in Healy and McKinley Village (April 15, 2015; August 28, 2015; September 30, 2015; February 8, 2017). At each of these meetings, NPS staff members were in attendance to provide maps about the general wayside concept and to gather public feedback. Additionally, ADOT&PF presented information at the March 8, 2017 Denali Borough Assembly meeting, a public meeting held at the McKinley Village Community Center. NPS Staff were in attendance to listen to comments provided by the public and borough officials.

A public scoping period about the wayside and trails concept was open from October 21, 2015 to December 19, 2015 and was announced through a press release and social media, providing the public an opportunity to submit comments via mail, email, or through the Planning and Environmental Comment (PEPC) website. Additionally, a 30-day public comment period accompanied the MP 231 Geotechnical Investigation EA in the fall of 2016. Public comments submitted as part of these multiple scoping efforts addressed both the geotechnical investigation and the overall wayside project and have been incorporated in this analysis and in the planning of the project.

## 8. Selected References

### **Alaska Department of Transportation and Public Facilities (ADOT&PF)**

2016 - *Parks Highway MP 231 Enhancements Project No.* (State/Federal): 61299/0A44020. Current information available at: DOT Alaska Project No. 61299/0A44020 (<http://dot.alaska.gov/nreg/parks231/>)

### **HDR Alaska, Inc.**

2013 - *Jurisdictional Determination Report: George Parks Highway Milepost 229-232, Alaska* (Wetlands Report)

### **U.S. Department of the Interior, National Park Service (NPS)**

1986 – *Denali National Park and Preserve General Management Plan*, NPS Denver Service Center, NPS D-96-A

1997 – *Entrance Area and Road Corridor Development Concept Plan Environmental Impact Statement (EIS)*, NPS Denver Service Center, NPS D-244

2006 – *NPS Management Policies*

2008 - *Nationwide Programmatic Agreement (PA)* – per Section 106 of the National Historic Preservation Act, as amended (16 U.S.C. 470f), the National Park Service (NPS) and Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers (NCSHPO)

2014 – *Upgrade Oxbow Trail to Meet Accessibility Guidelines*, Categorical Exclusion

2015 – *NPS NEPA Handbook*; Director's Orders #12; available at: National Park Service NEPA Handbook Hyperlink (<https://sites.google.com/a/nps.gov/nepa-handbook/home>)

2015 – *Value Analysis Study: Construct McKinley Village Trailhead Parking Area*, July 27-29

2016 – *Milepost 231: Geotechnical Investigations Environmental Assessment*

2017 – *Letter of Concurrence with Cultural Resource Report*, State of Alaska, State Historic Preservation Office

### **U.S. Department of Transportation**

1966 - *US Department of Transportation (DOT) Act of 1966 § 4(f)*

### **United States Law**

1918 – *Migratory Bird Treaty Act (MBTA)*, U.S.C. §§703-712

**APPENDIX A**  
**SUBSISTENCE - SECTION 810(a) OF ANILCA**  
**SUMMARY EVALUATION AND FINDINGS**

**Milepost 231 Trailhead Wayside and Trail Connections**

**I. INTRODUCTION**

This section was prepared to comply with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). It summarizes the evaluation of potential restrictions to subsistence activities that could result from the construction of a wayside and trail connections near milepost 231 (MP 231) on the George Parks Highway in Denali National Park and Preserve.

**II. THE EVALUATION PROCESS**

Section 810(a) of ANILCA states:

"In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands . . . the head of the federal agency . . . over such lands . . . shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. No such withdrawal, reservation, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency -

(1) gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to section 805;

(2) gives notice of, and holds, a hearing in the vicinity of the area involved; and

(3) determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions."

ANILCA created new units and additions to existing units of the National Park System in Alaska. Denali National Park and Preserve was created by ANILCA Section 202(3)(a):

"The park additions and preserve shall be managed for the following purposes, among others: To protect and interpret the entire mountain massif, and additional scenic mountain peaks and formations; and to protect habitat for, and populations of, fish and wildlife, including, but not limited to, brown/grizzly bears, moose, caribou, Dall sheep, wolves, swans and other waterfowl; and to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other wilderness recreational activities."

ANILCA Section 202(3) also states: "Subsistence uses by local residents shall be permitted in the additions to the park where such uses are traditional in accordance with the provisions in Title VIII.

Title I of ANILCA established national parks for the following purposes:

". . . to preserve unrivaled scenic and geological values associated with natural landscapes; to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas; to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rainforest ecosystems to protect the resources related to subsistence needs; to protect and preserve historic and archeological sites, rivers, and lands, and to preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing, and sport hunting, within large arctic and subarctic wildlands and on free-flowing rivers; and to maintain opportunities for scientific research and undisturbed ecosystems.

". . . consistent with management of fish and wildlife in accordance with recognized scientific principles and the purposes for which each conservation system unit is established, designated, or expanded by or pursuant to this Act, to provide the opportunity for rural residents engaged in a subsistence way of life to continue to do so."

The potential for significant restriction must be evaluated for the proposed action's effect upon ". . . subsistence uses and needs, the availability of other lands for the purposes sought to be achieved and other alternatives which would reduce or eliminate the use. . . ." (Section 810(a))

### **III. PROPOSED ACTION ON FEDERAL LANDS**

#### **Alternative 1 - Existing Conditions (No Action Alternative)**

No wayside and no connection trails would be built in the MP 231 area. The highway shoulders currently used for parking and trailhead access would be removed by the new bridge construction planned by the Alaska Department of Transportation and Public Facilities (ADOT&PF). No pedestrian facilities would be constructed away from the highway. Safety concerns would not be addressed. Connection trails to the Triple Lakes and Oxbow trails would not be created.

#### **Alternative 2 – Construction of Day Use Area and MSLC Connection Trails**

A wayside would be constructed at MP 231 on the Parks Highway, providing separated paved parking and pedestrian facilities, wayside amenities, and a formal trailhead. Connections to existing area trails would be created, including trails built to the standards for accessibility (ADA/ABA). This project would be built by ADOT&PF in conjunction with replacement of the highway bridge over the Nenana River, a safety enhancement project that will include turning lanes as well as lanes dedicated to non-motorized forms of travel (i.e. bike and pedestrian lanes.)

Alternatives 1 and 2 are described in detail in the environmental assessment (EA). Customary and traditional subsistence use on NPS lands will continue as authorized by federal law under all alternatives. Federal regulations implement a subsistence priority for rural residents of Alaska under Title VIII of ANILCA.

### **IV. AFFECTED ENVIRONMENT**

Subsistence uses within Denali National Park and Preserve are permitted in accordance with Titles II and VIII of ANILCA. Section 202(3)(a) of ANILCA allows local residents to engage in subsistence uses, where such uses are traditional in accordance with the provisions in Title VIII. Lands within former Mount McKinley National Park are closed to subsistence uses.

A regional population of approximately 300 eligible local rural residents qualifies for subsistence use of park resources. Resident zone communities for Denali National Park are Cantwell, Minchumina, Nikolai, and Telida. By virtue of their residence, local rural residents of these communities are eligible to pursue

subsistence activities in the new park additions. Local rural residents who do not live in the designated resident zone communities, but who have customarily and traditionally engaged in subsistence activities within the park additions, may continue to do so pursuant to a subsistence permit issued by the park superintendent.

The NPS realizes that Denali National Park and Preserve may be especially important to certain communities and households in the area for subsistence purposes. The resident zone communities of Minchumina and Telida use park and preserve lands for trapping and occasional moose hunting along area rivers. Nikolai is a growing community and has used park resources in the past. Cantwell is the largest resident zone community for Denali National Park and Preserve, and local residents hunt moose and caribou, trap, and harvest firewood and other subsistence resources in the new park area.

Primary subsistence species, by edible weight, are moose, caribou, furbearers, and fish. Varieties of subsistence fish include Coho, King, Pink and Sockeye salmon. Dolly Varden, Grayling, Lake Trout, Northern Pike, Rainbow Trout and Whitefish are also among the variety of fish used by local people. Beaver, coyote, land otter, weasel, lynx, marten, mink, muskrat, red fox, wolf and wolverine are important furbearer resources. Shed (discarded) animal parts and plants are collected and used for subsistence purposes. Rock and willow ptarmigan, grouse, ducks and geese are important subsistence wildlife resources. Wild berries are also commonly harvested for subsistence use near the project site.

The NPS recognizes that patterns of subsistence use vary from time to time and from place to place depending on the availability of wildlife and other renewable natural resources. A subsistence harvest in any given year may vary considerably from previous years because of such factors as weather, migration patterns and natural population cycles. However, the pattern is assumed to be generally applicable to harvests in recent years with variations of reasonable magnitude.



## **V. SUBSISTENCE USES AND NEEDS EVALUATION**

To determine the potential impact on existing subsistence activities, three evaluation criteria were analyzed relative to existing subsistence resources that could be impacted.

The evaluation criteria are:

- the potential to reduce important subsistence fish and wildlife populations by (a) reductions in numbers; (b) redistribution of subsistence resources; or (c) habitat losses;
- the effect the action might have on subsistence fishing or hunting access; and
- the potential to increase fishing or hunting competition for subsistence resources.

The potential to reduce populations:

Provisions of ANILCA and Federal and State regulations provide protection for fish and wildlife populations within Denali National Park and Preserve.

Construction of a wayside and trail connections near MP 231 would impact approximately 2.5 acres of wildlife habitat and populations but would not result in significant adverse impacts on the distribution or migration patterns of subsistence resources. Therefore, no change in the availability of subsistence resources is anticipated as a result of the implementation of this proposed action.

Restriction of Access:

Section 811 of ANILCA addresses “Access” for subsistence as follows: “The Secretary shall ensure that rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands.” Traditional access for Title VIII subsistence uses should not be significantly restricted under the proposed action.

Alternative 1 (No Action), the status quo, and Alternative 2 (Proposed Action), are not anticipated to significantly limit or restrict the access to subsistence uses within the ANILCA additions of Denali National Park or Denali National Preserve. Federal and State regulations assure the continued viability of fish and wildlife populations.

Increase in Competition:

Alternative 1 (No Action), maintaining the status quo, and Alternative 2 (Proposed Action) are not expected to result in increased competition for fish, wildlife or other resources that would significantly impact subsistence users in Denali National Park and Preserve. Federal and State regulations assure the continued viability of particular fish or wildlife populations

## **VI. AVAILABILITY OF OTHER LANDS**

The proposed action is consistent with the mandates of ANILCA, including Title VIII, and the NPS Organic Act.

## **VII. ALTERNATIVES CONSIDERED**

Alternative locations and alternative designs for the wayside were discussed and are detailed in the EA. All alternatives discussed occur generally within the same geographic area with no appreciable difference with respect to impacts on subsistence resources.

## **VIII. FINDINGS**

This evaluation concludes that neither alternative would result in a significant restriction of subsistence uses in Denali National Park and Preserve.



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Department of Transportation and Public Facilities

NORTHERN REGION  
Design and Engineering Services  
Preliminary Design and Environmental

2301 Peger Road  
Fairbanks, Alaska 99709-5316  
Main: 907-451-2237  
TDD: 907-451-2363  
Fax: 907-451-5126

June 8, 2015

Don Striker  
Superintendent  
Denali National Park and Preserve  
P.O. Box 9  
Denali, Park, AK 99755-0009

Dear Mr. Striker:

Re: Parks Hwy MP 231 Enhancements  
61299/0A44020

The Northern Region State of Alaska Department of Transportation and Public Facilities (Department), in cooperation with the Alaska Division of the Federal Highway Administration (FHWA), proposes to construct dedicated pedestrian facilities, including construction of a new highway bridge accommodating separated pedestrian facilities and turn lanes across the Nenana River, construction of a new wayside and trail connections, and construction of turn lanes for two intersections on the Parks Highway between Milepost (MP) 230 and MP 232. The proposed project is located in Sections 25, 26, 35, & 36, Township 14 South, Range 7 West, Fairbanks Meridian (U.S. Geological Survey Quadrangle Healy C-4) (Figure 1).

The Department is requesting your concurrence that the proposed project and associated improvements described herein are solely for the purpose of preserving or enhancing the activities, features, or attributes that qualify Denali National Park and Preserve (DNP&P) for protection under Section 4(f) of the *U.S. Department of Transportation Act of 1966*. The FHWA intends to apply the exception for transportation enhancement activities and mitigation activities in accordance with 23 CFR 774.13(g) based on your written concurrence.

Additionally, the Department's construction Contractor may wish to utilize portions of the proposed improvements on DNP&P property for construction staging during construction. We are requesting your concurrence that these activities will meet the temporary occupancy exception in accordance with 23 CFR 771.13(d).

## **Project Purpose & Description**

The purpose of the proposed project is to enhance safety and accommodations for pedestrians, bicyclists, and visitors in the McKinley Village Area. The area currently lacks pedestrian facility connections between the Village View Subdivision and hotel areas to trailheads at the north end of the existing Nenana River Bridge. Pedestrian amenities are also needed to cross the Parks Highway to access businesses at the south end of the bridge. Visitors to the area frequently stop their vehicles in limited space along the highway for photo opportunities at the DNP&P sign, located at the northern end of the bridge. The lack of pedestrian facilities and high pedestrian traffic can lead to conflicts between pedestrians and vehicles traveling on the Parks Highway. Lack of turning lanes in the area increases the likelihood of vehicular collisions and loss of efficient traffic flow related to turning traffic at the MP 230 subdivision road (Old Parks Highway) and the businesses and public boat launch access points at MP 231.

The project proposes to:

- Construct dedicated pedestrian access across the Nenana River.
- Construct pedestrian facilities to connect Triple Lakes and Oxbow trailheads, located north of the Nenana River Bridge.
- Construct a pedestrian facility to connect two business areas south of Nenana River Bridge.
- Construct a rest area for travelers to safely access the DNP&P Boundary sign that is a frequent photograph attraction and also north of Nenana River Bridge.
- Construct roadway improvements between MP 230 and 232, including turn lanes, drainage improvements, and pavement rehabilitation.

## **Section 4(f) Property Description**

Denali National Park and Preserve (DNP&P) is owned and operated by the U.S. Department of the Interior, National Park Service (NPS). The six million acre park is a formally designated significant publicly-owned park that is protected under Section 4(f) of the *Department of Transportation Act of 1966*. The portion of the Section 4(f) property to be incorporated into a transportation facility is located within the Entrance Area and Road Corridor ("Frontcountry") area identified in the 1997 *Entrance Area and Road Corridor Development Concept Plan* and *Consolidated General Management Plan* (CGMP). The area along the Parks Highway corridor is within the Motorized Sightseeing sub-zone, which is designated for access to developed areas, may include some commercial traffic, and should provide for wildlife and scenery viewing that is generally dependent on a vehicle.

## **Proposed Section 4(f) Involvement**

### Permanent Improvements

The proposed project would construct a rest stop/parking area and trail connections within DNP&P, resulting in approximately three acres of undeveloped parkland that would be permanently impacted. The parking area and trail connections are anticipated to include the following elements with final layout determined by the NPS during detailed design (Figure 2):

- Vehicle parking for 16-20 automobiles and pull-through parking for 10-20 large vehicles/RVs.
- Single entry and exit point to and from the Parks Highway supporting planned one-way circulation.
- Accessibility to the DNP&P boundary sign for visitor photo opportunities.
- Rest stop amenities including rest rooms, rain shelter, picnic tables, and trash receptacles.
- New connection between Triple Lakes and Oxbow trails (grade-separated from the Parks Highway), partially constructed in Department right-of-way.
- Parks Highway wayside traffic signs on northbound and southbound entry and exit.
- Shuttle bus pick-up and drop-off area.
- Turn lanes on the Parks Highway for the new rest area.

Ownership and management of the portion of the Section 4(f) property where improvements will occur will remain with NPS, and there will be no permanent incorporation of the Section 4(f) property into a transportation facility for the purposes of Section 4(f).

### Temporary Occupancy

During construction of the project the Contractor may choose to utilize the new wayside area for construction staging for work on the north side of the Nenana River and as a lay-down area for bridge construction equipment and materials (crane(s) and associated equipment, bridge piling, and girders).

This work meets the exception for temporary occupancy based on the following:

- Use of this area will be temporary and will be less than the time needed for construction of the project.
- No change in ownership of the land is required.
- The scope of work is minor (staging and storage) and there will be no changes to the 4(f) property beyond that requested by the NPS for enhancements as outlined above under permanent improvements.
- There are no anticipated permanent adverse physical impacts due to the use of the area for staging and storage, nor will there be interference with the protected activities, features, or attributes of the property other than that outlined in permanent improvements.
- The area will be fully restored to the condition outlined in permanent improvements upon project completion.

### **Impact Avoidance, Minimization, and Mitigation or Enhancement Measures**

The proposed parking area and trail connections are being planned and designed by NPS, in cooperation with the Department, as a park enhancement project.

The purpose of the proposed parking area is to provide enhanced access to the park for travelers and local residents. The proposed project would preserve and enhance activities and features that qualify the property for Section 4(f) protection, namely recreation. Specific preservation and enhancement elements of the project include:

- Providing a point of 'first' contact and initial introduction to DNP&P for northbound travelers on the Parks Highway by providing:
  - rest facilities,
  - a safe location for picture taking of the welcome to DNP&P sign,
  - a location for interpretive programs, and
  - a shuttle bus pick-up and drop-off location to improve access into existing DNP&P facilities at MP 237.
- Providing dedicated pedestrian facilities to enhance use of the recreational trails in DNP&P including:
  - a trailhead for the Triple Lakes, Oxbow, and Nenana Loop trails, and
  - pedestrian linkage to the McKinley Village area.
- Improving safety for recreational users and tourists in the McKinley Village and DNP&P boundary sign areas.

As discussed with DNP&P staff on February 18, 2015, NPS determined that the proposed involvement in DNP&P would provide a benefit to the park and is solely for the purpose of preserving or enhancing the activities, features, and attributes that qualify DNP&P for Section 4(f) protection.

This consultation will be documented in the Categorical Exclusion document for this project. If you require further information, please contact me, at the address above, by telephone at 907-451-2238, or by email at [brett.nelson@alaska.gov](mailto:brett.nelson@alaska.gov).

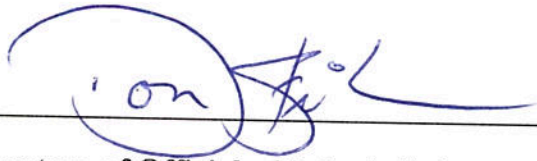
Sincerely,



Brett Nelson  
Regional Environmental Manager



June 8, 2015



**Signature of Official with Jurisdiction**

Don Striker

Denali National Park & Preserve Superintendent

Permanent Improvements

I concur with the Department's determination that the proposed transportation project's permanent improvements in Denali National Park & Preserve as described herein, is solely for the purpose of preserving or enhancing the activities, features, and attributes that qualify DNP&P for Section 4(f) protection. Further, I understand FHWA intends to apply the exception for transportation enhancement activities and mitigation activities in accordance with 23 CFR 774.13(g) based on my written concurrence and the attached documentation.

Temporary Occupancy

I concur with the Department's determination that the proposed transportation project's temporary use of Denali National Park & Preserve property as described herein constitutes a temporary occupancy in accordance with 23 CFR 774.13(d).

Enclosures:

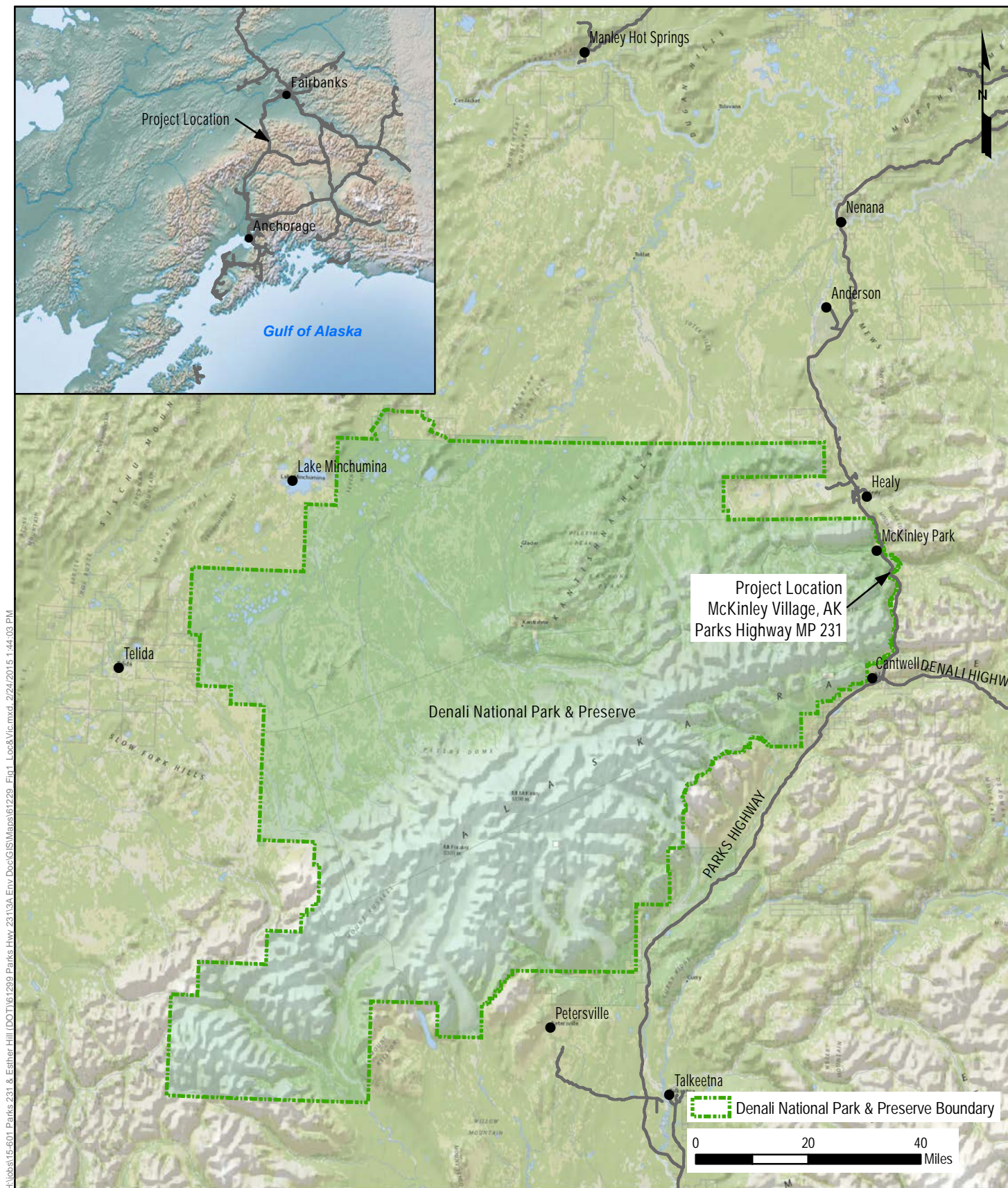
Figure 1 - Location and Vicinity Map

Figure 2 - Proposed Section 4(f) Involvement

lml/vzb

cc by e-mail: Lauren Little, P.E., DOT&PF, Northern Region, Engineering Manager  
Brett Nelson, DOT&FP, Northern Region, Regional Environmental Manager



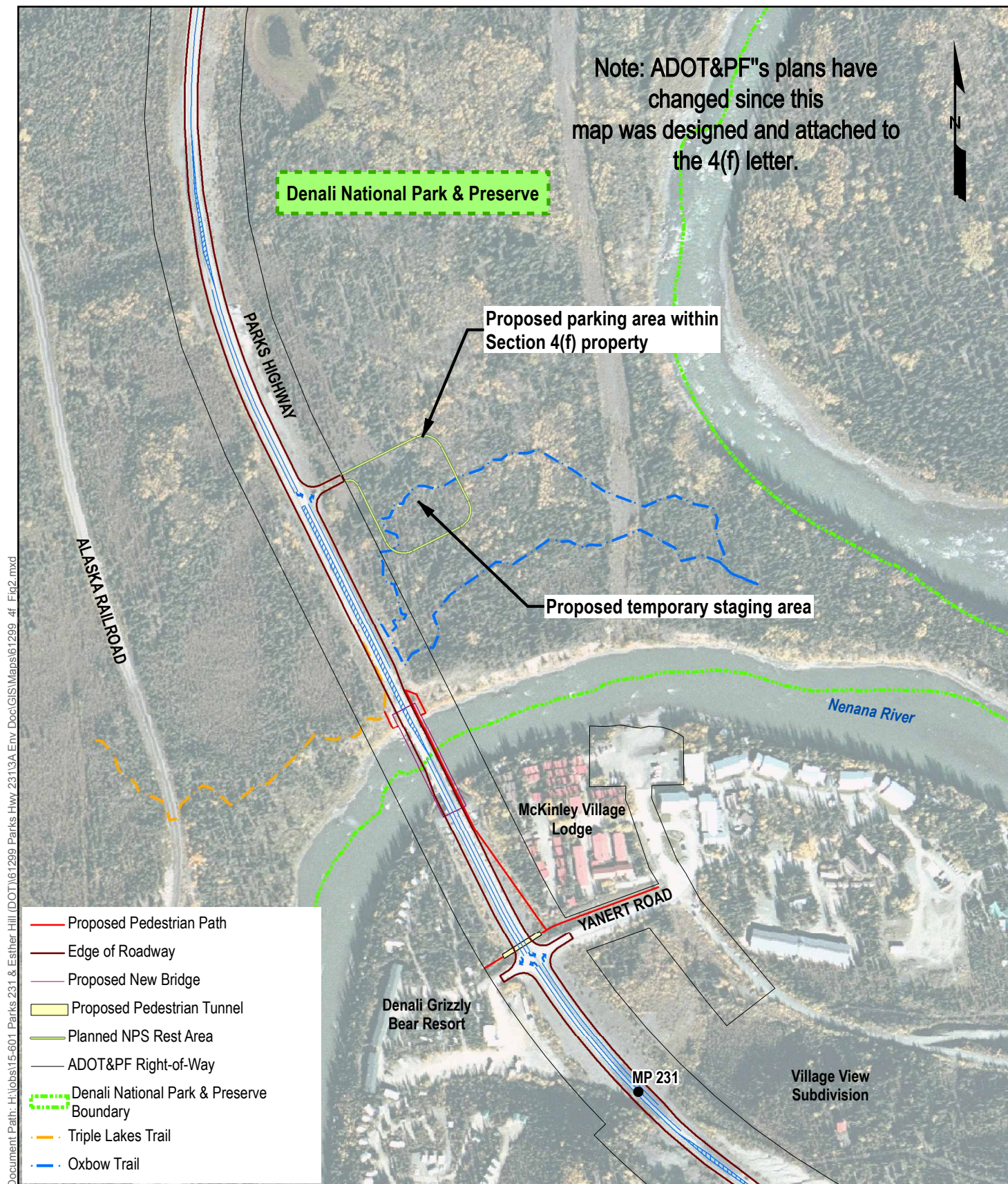


Sections 25, 26, 35, & 36  
T. 14S, R. 7W, Fairbanks Meridian  
USGS Quadrangle Healy C-4

Parks Highway MP 231 Enhancements  
Project No. (State/Federal): 61299/0A44020  
Alaska Department of Transportation  
& Public Facilities

**Figure 1**  
**Location and Vicinity Map**





0 500 Feet

Sections 25, 26, 35, & 36  
T. 14S, R. 7W, Fairbanks Meridian  
USGS Quadrangle Healy C-4

Parks Highway MP 231 Enhancements  
Project No. (State/Federal): 61299/0A44020  
Alaska Department of Transportation  
& Public Facilities

**Figure 2**  
**Proposed Section 4(f)**  
**Involvement**



## Appendix C – Possible future parking expansion





## Appendix D – ADOT&PF Parks Highway MP 231 Enhancements Overview

(Source: ADOT&PF. Note: The disparity in the shape of the trail connections immediately adjacent to the highway are still being determined within the ADOT&PF ROW. The NPS trail connections would connect to the ADOT&PF trails as generally depicted in Appendix C and throughout the EA.)

