



National Park Service
U.S. Department of the Interior

Denali National Park and Preserve
Alaska

FINDING OF NO SIGNIFICANT IMPACT
Milepost 231 Wayside and Trail Connections

Recommended:



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Superintendent, Denali National Park and Preserve

Feb 9, 2018

Date

Approved:



Herbert C. Frost
Regional Director, Alaska, National Park Service

15 Feb 2018

Date

1. Introduction

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to construct a wayside and trail connections near milepost 231 (MP 231) on the George Parks Highway.

The MP 231 and McKinley Village area poses hazards to the safety of park visitors and motorists passing through the area due to use of highway shoulders for trailhead parking, vehicles parking adjacent to the road while photographs are taken of the wooden entrance sign, slowing and turning vehicular traffic, and pedestrian presence on the highway. The proposed wayside with established trailhead, trail connections, and relocation of the wooden park sign will address these hazards by separating high speed and slowing motor vehicle traffic and by separating pedestrian traffic from motorized travel areas. The wayside and trail connections are intended to create a safe, separated, and welcoming recreational facility for visitors to Denali National Park and Preserve and are being planned in conjunction with the Alaska Department of Transportation and Public Facilities (ADOT&PF) safety enhancement project for the McKinley Village area.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, the NPS selected the proposed action, Alternative 2, to develop the MP 231 wayside and trail connections. The selected alternative will provide for separated parking and pedestrian facilities through the creation of an approximately 2.5 acre wayside, a formal trailhead, and trail connections to existing area trails.

The wayside will include paved parking, vault toilets, a bus stop, picnic facilities, information and interpretive signs, and waste and recycling receptacles. The wooden park sign will be located within the wayside to permit safe photography of the sign removed from the shoulder of the highway. Approximately 2500 linear feet of trail connections to the existing Oxbow and Triple Lakes trails will be constructed. The trails east of the highway will be constructed to standards for accessibility. Access to the Triple Lakes trail will be via a trail constructed under the highway on the north end of the bridge over the Nenana River. The wayside will be located behind a vegetated buffer to minimize visibility to or from the Parks Highway.

Initially, the footprint of the wayside will be used by ADOT&PF as a lay-down yard during construction of pedestrian bridge facilities over the Nenana River. During the construction period, ADOT&PF will coordinate with the NPS to minimize impacts to motorists and to hikers wishing to access the Oxbow and Triple Lakes trails by creating temporary access trails and notifying stakeholders in advance of construction activity.

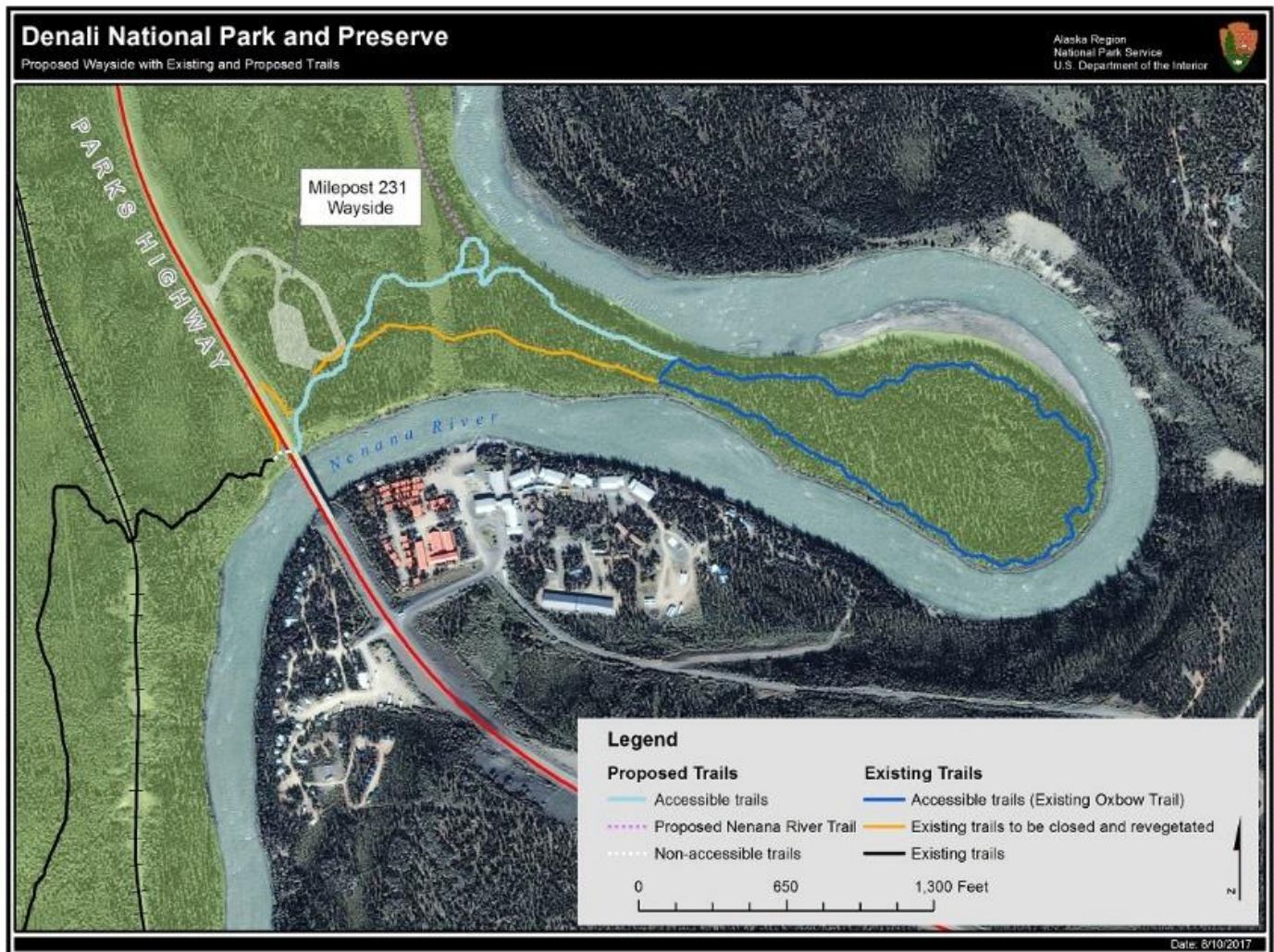
Once constructed, the NPS intends to operate the facility during the high season for visitors, May to September. The NPS will maintain and operate the wayside and trails that are located on NPS land. The project will implement a number of resource protection measures to minimize the degree of adverse effects on avian and wildlife species, water resources (drainage), soils, vegetation, and the viewshed.

Rationale

Alternative 2 was selected because it best meets the project purpose to:

- Reduce safety hazards by creating off-highway parking for photography and trailhead access.
- Reduce safety hazards by separating pedestrian traffic from high-speed motor vehicle traffic.
- Create a formal trailhead and visitor amenities at an increasingly busy visitor node within the park's frontcountry developed area in the Nenana River Corridor consistent with the *Entrance Area and Road Corridor* Development Concept Plan (EIS, 1997).

Figure 1. Proposed Wayside and Trail Network in Denali National Park and Preserve



3. Mitigation Measures

The selected alternative incorporates the mitigation measures detailed in the EA. Also see Appendix A of this FONSI.

4. Other Alternatives Considered

Alternative A: No Action Alternative

In addition to the selected alternative, the EA analyzed Alternative A, the No Action Alternative. The No Action Alternative was not chosen because ADOT&PF plans to proceed with the MP 231 safety enhancement project and associated changes regardless of the NPS decision. This will result in

removal of the small amount of current parking (the ADOT&PF design eliminates the shoulder areas presently used for parking) and a lack of pedestrian access to existing trailheads. These changes will exacerbate the current hazards for pedestrians, photographers, and motorists as all parties would continue to mix in a high speed zone in a setting with further diminished opportunities to walk or park away from the highway.

In advance of the alternatives considered in the EA, park management also evaluated larger and smaller approaches to the development that were ultimately determined to either fail to address the safety concerns or to be beyond that which is necessary to meet the need for the project.

5. Public Involvement/Agency Consultation

The NPS and ADOT&PF consulted extensively during development of the alternatives. Tribal consultation was conducted and communication with the Denali Borough and the Federal Highways Authority has informed the planning process.

The NPS hosted a multi-project open house in November of 2015, which included a station regarding the proposed wayside. ADOT&PF hosted five open houses regarding their project in Healy and McKinley Village beginning in 2015. At each of these ADOT&PF 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 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 early in the planning process. 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 included in this analysis and in the planning of the project.

A public review and comment period of the EA was open on the Planning and Environmental Comment (PEPC) website from October 2, 2017 to November 1, 2017. The press release announcing the EA was mailed to local media, agencies and stakeholders. The EA was available on PEPC and the public was invited to submit comments via mail, email, or through PEPC. Six comments were received via PEPC and email. The public comments did not change the conclusions of the EA about the environmental effects of the action but did offer substantive feedback, which is addressed in Appendix B of this FONSI.

6. Finding of No Significant Impact

The selected alternative will impact approximately 2.5 acres of park land near the George Parks Highway. Approximately 2500 linear feet of trail will be constructed, including a 6-foot wide accessible segment.

Vegetation and soils within the project area will be removed and compacted, including the potential for reduced surface water absorption in the approximately 2.5 acre project area. The area consists of mixed white spruce broadleaf forest, as is common the area, and does not contain any wetlands nor floodplains. Drainage structures will be installed in the wayside and on trails to allow surface water to move through unimpeded. Revegetation measures will be taken once the project is complete to rehabilitate impacted areas and close informal or abandoned trails.

Removal of vegetation and construction of wayside amenities will impact the viewshed for visitors and motorists in the area. A vegetative buffer will be retained between the wayside and the highway and vegetation will be retained within the wayside in a center “island” to diminish impacts to the viewshed and vegetation. Passing motorists will see the driveway to the wayside, but the congestion common under the existing conditions as a result of parking on the shoulder will be eliminated as a result of ADOT&PF’s new lane design.

Vegetation clearing will remove or disturb wildlife habitat in and near the project area for resident mammals and avian species. The project will introduce mechanized activity in the area during construction and will expand human use of the area into the future by virtue of creating a new recreation facility. Construction crews will be required to practice best management practices for food and waste storage while operating at the site. The wayside will include wildlife resistant trash, recycling, and toilet facilities designed to reduce impacts to wildlife. Vegetation removal will occur consistent with the Migratory Bird Treaty Act.

These changes will occur in close proximity to the Parks Highway and the developed area of McKinley Village. In the context of the general development in the park’s entrance area and relative to the resources found throughout the park and preserve, the selected alternative will not have a significant adverse impact on vegetation, soils, viewshed, or wildlife resources.

The project will temporarily impact the local community during the construction period due to the presence of machinery and crews. Lasting impacts for the local community include altered visitor patterns related to expanded recreational opportunities and changes to traffic patterns, intended to reduce hazards in the area.

Similarly, construction has the potential to impact recreation by temporarily limiting use of the area. Lasting impacts to public safety and recreation will include improved public safety in the vicinity of the highway, additional recreation facilities and types of recreational opportunities, the possibility for multi-modal connections, and a change to a more developed recreation setting. The NPS and ADOT&PF will work together to limit impacts to the local community and recreation during construction. The NPS and ADOT&PF have partnered in the development of this project with the

objective of producing beneficial effects for the local community and park visitors recreating in the area, while enhancing the public safety of passing motorists, local residents, and park visitors.

The selected alternative will not have significant effects on air quality, floodplains, wetlands, acoustic resources, Indian trust resources or sacred sites. This action complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988, 11900, and 12898. There will be no significant restriction of subsistence activities as documented by ANILCA Title VIII, Section 810(a) summary evaluation and findings. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

7. Conclusion

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Appendices include:

- Appendix A: Mitigation Measures and Responsible Parties
- Appendix B: Response to Substantive Public Comments
- Appendix C: Non-impairment Determination
- Appendix D: US Department of Transportation (DOT) Act of 1966 § 4(f); federal concurrence granting permission for Permanent Improvements and Temporary Occupancy on Denali National Park and Preserve property

Appendix A:

Mitigation Measures and Responsible Parties

Mitigation Measure	NPS	ADOT &PF
Vegetated buffer maintained between highway and wayside	•	•
Re-vegetation measures undertaken to close existing informal trails and to mitigate unnecessary 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 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)	•	•

Appendix B: Response to Substantive Public Comments

Six comments were received during the public comment review period of the EA. The commenters generally supported the proposed project. This appendix offers NPS responses to substantive comments received during the public review period of the EA. The NPS appreciates the insights and questions provided during the public comment period.

Safety Issues

Comment (multiple commenters): Development of the proposed project will increase rather than diminish safety hazards in the area for pedestrians and motorists. There will be increased congestion with turning vehicles due to increased use of the area. The NPS should consider other approaches to this project.

Response: The NPS and the Alaska DOT&PF collaborated extensively to gauge the safety hazards and public uses of the area. Over the years of project planning, many different solutions and designs have been evaluated. Increased use of the area is expected both as a reflection of general trends (historic and forecasted highway numbers and increasing development in McKinley Village) and as a result of the new facilities. The design of the project is intended to safely accommodate increased use.

The AKDOT&PF collected and analyzed movement data (vehicle counts) over multiple years. Consultation with design guides and assessment of the current situation where there is a mix of pedestrians and high and low speed vehicular traffic informed ADOT&PF's decision to engineer separated areas for types and speeds of travel. The design intent is to provide safe options for access to the trailheads and wayside for both vehicles and pedestrians.

Comment (multiple commenters): The wayside will help address the many safety concerns related to pedestrian traffic and highway-shoulder parking in the MP 231 area. The wayside is needed and welcome.

Response: Addressing safety concerns and eliminating the highway-shoulder parking currently used for trail access are major goals of the project.

Comment (single comment): Siting the new trail connections near the bluffs of the Nenana River will introduce hikers to unstable areas where falls from the cliff are possible.

Response: Trails will be designed to avoid unstable areas. Hiking on trails carries certain risks and concerns and are not unique to the trails proposed in this project.

Operational Concerns

Comment (multiple commenters): The proposed project will result in much more use of the area than currently occurs. Some of this increased use will result in unwelcome activities that could include camping, RV camping, food hazards, additional trash in the area, and illegal activities.

Response: The NPS agrees that use of the area will increase and that information, staffing, and amenities to meet visitor needs are necessary. Camping of all types will be prohibited at the facility. Signs and law enforcement patrols and citations will be used to enforce this prohibition and to monitor for illegal activities. The facility will include vault toilets and waste receptacles to provide for restroom needs and proper disposal of waste.

Comment (multiple commenters): Does the park have the money and staff capacity to adequately maintain and patrol the new facility in its location that is somewhat remote from other entrance area operations?

Response: The NPS recognizes the balance between existing resources related to staffing/funding and creating new facilities where sensible. The MP 231 area is a busy area and expansion of visitor facilities in McKinley Village is ongoing and expected to continue. The NPS is committed to sustainable use and is coordinating with ADOT&PF to provide for the area's recreational and vehicular use. The NPS is also aware that maintenance and law enforcement staff time will need to be evaluated and appropriately re-allocated to the new facility. The area already has an NPS presence as law enforcement patrols are routine in the Nenana River Corridor along the Parks Highway between the park entrance and McKinley Village.

Comment (single comment): The FONSI should stipulate the costs associated with maintaining and patrolling the area with law enforcement. Will the work be contracted?

Response: The NPS considers the findings of the EA in addition to other information (such as costs) in making the final decision about whether to proceed with a proposed project. Contracting for maintenance is not planned at this time, but has been considered as an option in the future if appropriate. Law enforcement of the area is the exclusive jurisdiction of the NPS.

Comment (multiple commenters): Has the park explored other options such as a smaller wayside, reduced speed limits through the area, different siting for the pedestrian lane, associated trails, and wayside?

Response: A couple of years of coordination, analysis, and consultation (via public meetings and an earlier comment period) with area businesses, the State of Alaska, landscape architects, the public, and park staff have informed the design for the proposed project. Additionally, a Value Analysis comprised of local stakeholders thoughtfully explored a wide variety of other approaches to the project. Decisions about speed and other elements of the project are beyond the park's influence. For the AKDOT&PF response to public comments, please see <http://dot.alaska.gov/nreg/parks231/files/parks231-comment-response.pdf>

Comment (multiple commenters): This project is unnecessary. Adequate parking and access already exists in and around the park's entrance area.

Response: Parking facilities in and around the park entrance are observed to be full for much of the summer tourist season (e.g. around the Denali Visitor Center, Wilderness Access Center, and in the Nenana Canyon) and crowding is observed by law enforcement and other staff at the MP 231 area.

Feedback about Commercial Operations

Comment (single comment): No sales or retail activities should be permitted at the new facilities and a three year monitoring period should occur before issuing any permits for commercial guiding or other use at the site and on the trails. Additionally, the 12-person limit should apply to any permitting in area. This EA should not serve as the authorizing tool for permitting commercial use of the proposed project.

Response: Authorized education and commercial partners currently conduct guided hiking on the Oxbow and Triple Lakes Trail. The NPS does not intend to stop this activity nor to introduce a 3-year monitoring period. The NPS recognizes that there may be heightened interest in commercial guiding in the area following project completion and will manage those activities in accordance with existing plans and standards for group size. This EA will not authorize new commercial use.

Feedback about Vegetation and Soils

Comment (single comment): Rather than diminishing the formation of informal trails in the area, the project will increase impacts to vegetation by removing vegetation and increasing the likelihood of additional informal trails forming with increased human use.

Response: The NPS recognizes that informal trails may develop near high use areas. Efforts will be made to design the facility to limit informal trail formation by providing an obvious trailhead and by siting the new trail connections relative to the flow of visitor traffic. This project will result in the removal of approximately 2.5 acres of vegetation. The NPS has determined that these changes to vegetation are not detrimental to the integrity of park resources.

Recreation Topics

Comment (multiple commenters): The proposed project will provide visitors a new recreational opportunity. By providing opportunities for accessible (ADA/ABA) recreation, park orientation, and an opportunity to photograph one of the park entrance signs, the proposed wayside and trails continue to fulfill existing front country planning goals for the Nenana River corridor.

Response: The NPS agrees that the project will be welcoming to passing motorists and may entice new visitors to experience the entrance area of Denali. The spirit of the project is to provide a safe place to photograph the park sign and safe access to the new and existing recreational opportunities.

Comment (single comment): The commenter is interested in evidence supporting the NPS assertion that visitors would have longer visits if this project is approved, particularly because the majority of

visitors to Denali are on set cruise ship or vacation package timelines and the project would likely not increase their visit times.

Response: Both current and past research conducted in Denali Park and research conducted elsewhere by Louviere and Timmermans (1990) and Clawson and Knetsch (2013) found that expanded recreation opportunities and associated facilities (e.g. trails) had a positive effect on people's stated preference for length of stay in protected areas. Additionally, ongoing data collection of park visitor statistics reveals that the non-cruise visitor numbers are growing as independent travelers increasingly visit Denali.

- Clawson, Marion, and Jack L. Knetsch. *Economics of outdoor recreation*. Vol. 3. Routledge, 2013.
- Louviere, Jordan, and Harry Timmermans. "Stated preference and choice models applied to recreation research: a review." *Leisure Sciences* 12.1 (1990): 9-32.

Comment (single comment): Bike use of the trails should not be permitted.

Response: The trail connections included in this project that connect to the Oxbow and Triple Lakes trails are not identified for bicycle use. Only the paved portions of the trail that will be built by ADOT&PF and will tie directly to the bridge across the Nenana River will be built to accommodate bikes. Bike racks will be provided in the wayside for cyclists traveling along the Parks Highway and/or cyclists who come to the wayside via the pedestrian lane from McKinley Village.

Comment (multiple comments): Will the location of the wooden entrance sign be visible from the highway? If visible, parking of some sort must be provided or motorists will stop the closest location regardless of design and intent. Part of the purpose of siting the sign on the side of the road is to inform travelers that they have entered a national park.

Response: The intent is to relocate the wooden sign to a location within the wayside to eliminate any temptation to stop temporarily on the shoulder of the highway. The safety of motorists and pedestrian is the reason behind this decision. The NPS realizes that removing the sign from view may reduce awareness by passing motorists that they have entered the park. However, the wayside itself will have a metal highway sign. A sign denoting the park boundary is also planned. Once in the wayside, photography of the wooden sign will take place in a safe setting.

Visitors who bypass the opportunity to view the wooden sign at MP 231 have a second opportunity to photograph a similar wooden sign located away from the highway, near the entrance to the park road (MP 237).

Comment (single comment): Consider the necessity of the bus stop as buses already provide access to the lodges in McKinley Village or consider locating the bus stop on the McKinley Village side of the bridge.

Response: The NPS recognizes that with the new pedestrian lane over the Nenana River, access from the trailheads to the area lodges will be easier and safer than under the existing conditions.

Nonetheless, the inclusion of a new bus stop allows for the option of bus service directly to the facility, particularly for those visitors not visiting the McKinley Village development. Future coordination with the various commercial operators of entrance area shuttle buses will determine how to best link the new bus stop with either existing routes or new transportation services.

Comment (single comment): Consider siting the pedestrian lane of the highway bridge on the east side of the bridge as many of the attractions (the wayside, the entrance sign, the Oxbow Trail, and numerous hotels) are located on the east side.

Response: This design decision was made by ADOT&PF as the design of the bridge is the responsibility of the ADOT&PF. The NPS has shared the feedback provided by the commenter with ADOT&PF and encourages the commenter to contact ADOT&PF to share this observation and concern.

Appendix C: Non-Impairment Determination

A determination of non-impairment is made for each of the park resource-related impact topics carried forward and analyzed in the environmental assessment for the preferred alternative. The park's Foundation Statement 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, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Wildlife Values and Habitat

Wildlife Values and Habitat are among the park's fundamental resources and values as identified in the park's Significance Statements in Denali's Foundation Statement. Past and present activities throughout the entrance area have disturbed habitat. The construction of an approximately 2.5 acre wayside and 2500 feet of trail connections near developed areas with buildings, roads, and parking lots does not constitute a major change in the setting for wildlife habitat and wildlife viewing. This project will not result in impairment to Wildlife Values and Habitat.

Scenic Resources (Viewshed)

Scenic Resources, described as the "Viewshed" in the EA, are also one of the park's fundamental resources and values. The selected alternative will be implemented in a manner to reduce impacts to the viewshed by leaving a vegetative buffer, by implementing revegetation efforts in the final stages of the project, and by designing wayside facilities in tones and design befitting a recreational setting in a national park. The proposed changes to the viewshed do not threaten the overall scenic resource values of the park and preserve because a small facility proximal to previous development found throughout the entrance area of Denali and relative to Denali's 6.1 million total acres is a small change. This project will not result in impairment to Scenic Resources.

Conclusion

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that the proposed action, conducted with the mitigation measures identified as part of Alternative 2, will not result in impacts to park resources and values that constitute impairment.

Appendix D:
US Department of Transportation (DOT) Act of 1966 § 4(f);
federal concurrence granting permission for Permanent
Improvements and Temporary Occupancy on Denali National
Park and Preserve property