



Advocating for Denali's Wilderness, Wildlife and Way of Life.

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[www.denalicitizens.org](http://www.denalicitizens.org)

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Superintendent Don Striker  
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Dear Superintendent Striker,

On behalf of the Board and members of Denali Citizens Council (DCC), thank you for this opportunity to comment during the Trails Plan Scoping process. Many of our approximately 300 members live and work near Denali National Park. Our members favor maintaining Denali's natural integrity and wilderness character.

Over years of commenting on park plans, DCC has consistently pointed out the importance of maintaining the "National Park difference" when managing the park. The National Park Service's enabling legislation, the Organic Act, set down this "difference." It provided for the highest degree of resource protection on NPS lands, and required that use of these lands must be consistent with protection of resource values. Other public lands did not carry this preservation mandate to such a high degree. The fact that the 2 million acre core park is designated Wilderness only adds support to this mandate. DCC believes that the National Park Service must provide consistent protection for park resources and wilderness character. Such protection should guide NPS thinking more than ever now as Denali approaches its Centennial in 2017. We believe that NPS has already done the right thing and honored the "national park difference" with its existing trails vision and policy - that is to minimize the construction of formal trails in Denali, with only a few exceptions near visitor centers and areas of visitor concentration.

**NPS has committed to "no formal trails" in the backcountry of Denali, except for those trails already identified in existing planning documents. The record is clear and is stated in your scoping notice.** Denali's General Management Plan (GMP, 1986) allowed for "expanding day use opportunities in the front country area," while maintaining a "no formal trails" policy in Denali backcountry/wilderness. The Entrance Area and Road Corridor DCP (FCP, 1997) stated that it designated only "certain areas along the road corridor for increased development, including formalized trails where appropriate." The Backcountry Management Plan (BCMP, 2006) held that backcountry access and travel in Denali should continue without designated routes or constructed trails to allow for freedom to explore and to minimize signs of human presence. The BCMP identified some areas where formal trails could be considered, but reaffirmed that, other than those trails already identified in EIS-level planning documents, the park would maintain a "no formal trails" policy.

This commitment may be 30 years old, but it has been re-stated several times in EIS-level documents, most recently in the 2006 BCMP, a document expected to provide guidance for the next 20 years, and therefore barely halfway into its expected lifespan.

To DCC and our members, the strong commitment to wilderness recreation, dispersed backcountry access and minimal signs of human presence described above **is the standard**, and need not be re-visited, and certainly not now, only a few years after having been so strongly re-stated in the Backcountry Management Plan. That is why we were a little perplexed at the language of the ‘Trails Plan scoping notice,’ which stated “The park has completed many of the projects in the FCP and BCMP and the maintained trail network is popular with visitors. The park’s designated wilderness remains largely free of maintained trails but is subject to increasing social trail formation. The park is interested in revisiting this vision for trails as it approaches its Centennial in 2017.” What are we to conclude from this language in the scoping document but that the park wants to re-visit the ‘no formal trails’ policy in toto? If there is any desire to re-visit this policy, **we reject it**. The policy should remain. NPS has ways to control access and address social trail formation already on the books.

That said, there is much to be gained from a renewed discussion of trails planning in Denali. We provide our comments below under the headings of the bullet points in the ‘Trails plan scoping notice’:

## **1. Comment on hiking opportunities**

### **a. Along the Denali Park Road-accessible backcountry:**

The first 15 miles of the park are widely accessible to vehicles and there is a free shuttle to the Savage River. As prescribed in EA or EIS-level documents, developed areas and formal trails serve a wider cross-section of the public, and there are more signs of human disturbance, including rest stops, campgrounds, interpretive facilities and formal trails.

Between Savage River and Toklat, hiking opportunities are focused on dispersed access for wilderness recreation. Access is limited to shuttle and tour buses, and shuttle travelers can be dropped off at any location to start their hikes. Guide services, through the Murie Science and Learning Center and Discovery Hikes, have concentrated hiking pressure in certain areas for their interpretive activities.

From Toklat to Eielson Visitor Center, the heart of the park provides wonderful hiking experiences, many of them on tundra, where visibility is broad and the going is smooth. There is only one commercial guiding operator in this area. Social trails have been recorded, but damage is most obvious at Eielson Visitor Center and areas of access from the park road to the Thorofare River.

From Eielson Visitor Center to Kantishna, access is more limited. Many of the shuttle buses turn around at Eielson and fewer visitors leave the road to hike between Wonder Lake and Eielson. This piece of road is, however, popular with bicycle users. Social trail formation between Wonder Lake and Kantishna is well understood by NPS.

A note on winter opportunities: When the NPS began its temporary road plowing to Mt. Vista Rest Stop in 2014, no one knew what it would do to existing opportunities. Prior to this, folks would use the unplowed park road as access. The BCMP had provided plugins at the Denali Kennels parking lot for those who chose to leave from there. It was widely felt that winter road plowing created a preference for commercial bus tours desiring to access Mt. Vista for an opportunity to capture a photo of Denali in winter. The reality, since then, is that non-commercial use has been greater in winter, and the expected tour buses have been few. Although DCC is not categorically opposed to the uses that developed after winter road plowing to Mt. Vista was permitted, we urge NPS to continue monitoring the effects of this use on resources, especially wildlife resources. We also support those activities that NPS has instituted in the headquarters area to support winter use.

**We strongly argue that adequate opportunity for hiking already exists along the Denali Park Road, though overuse could damage resources and vigilance is imperative. To protect this unique opportunity, we offer these comments:**

- i. Even with current levels of use, there are problems with social trail formation. If NPS is to continue with its vision for no additional formal trails in the backcountry, it must make a strong commitment to its social trails monitoring and mitigation program, including education of visitors, drivers and commercial users, closure of trailheads either on a seasonal or temporal basis, and establishment of a social trails working group.
  - ii. The opportunity to hike the Denali Backcountry and to experience the wilderness character of the park **is a precious asset of this park** and must be protected through limits on access. Such limits have been argued elsewhere by DCC, in our comments on the Vehicle Management Plan. We strongly opposed the daily limit of 160 vehicles in the VMP, as a direct threat to physical resources and visitor experience. The VMP provided no indicators and standards for the impacts of day hiking at Denali, but we argued that increasing access will further contribute to the formation of social trails and the degradation of the backcountry experience so many have chosen Denali to provide. When the regulation to establish a daily limit of 160 vehicles is proposed, we will oppose it and propose a lower limit.
  - iii. There is no reason why the “Find your Park” mandate of the 2016 NPS Centennial or Denali-focused activities in honor of the parks 2017 Centennial should in any way be used to change the established vision for trails in Denali National Park.
- b. Hiking opportunities in South Denali, the South additions and gateway lands**  
Hiking opportunities associated with the South Denali Implementation Plan could promote additional trails outside the scope of “wilderness recreation,” including a planned ADA accessible trail near the South Denali Visitor center, plus waysides and trailheads intended to support snowmachine use. We think that South Denali can absorb some of the tourism pressure along the Park Road.

**However, we have concerns regarding South Denali developments and access from state lands at the boundary of the park, as follows:**

- i. Hiking and skiing on Curry Ridge, above the planned South Denali visitor center, must separate motorized and non-motorized use, and must do so proactively, before the visitor center is constructed.
- ii. Use of the south additions of Denali by snowmachines has yet to be addressed and must be addressed, through definition of the term ‘traditional activities,’ which was narrowly defined for the core wilderness of the park, and was never meant, in the National Interest Lands Conservation Act, to include recreational access. Providing some limits on winter snowmachine access will be imperative over the next decade.
- iii. Fly-in hiking in the South Denali additions – NPS needs to work on whether or not fly-in hiking opportunities comport with the ‘dispersed use’ prescriptions in the backcountry plan, by concentrating use at certain access points and potentially damaging soundscape.
- iv. Road-accessible state lands immediately adjacent to the park provide gateways for hikers onto NPS lands. Hiking into the park from Cantwell, the Stampede Trail and Bison Gulch are just three examples. The park must cooperate with local and state entities to determine the future of these access points.

## **2. Make suggestions for future trails or for limiting trail development**

### **a. Denali Park Road-accessible backcountry:**

- i. There should be no constructed trails along the park road except those already built and those planned to be built in formal park planning documents.
- ii. **Formal Trails Plan – we recommend that NPS take a hard look at currently mandated formal trails by developing a Formal Trails Plan**

A Formal Trails Plan (EIS-level) would look at all constructed trails, both built and proposed, and establish a long term vision for these trails, especially those not yet built. Part of this effort would be to determine if the cost of construction and maintenance of formal trails is justified by their potential benefit. Such a Formal Trails Plan could be helpful in determining whether even some of the currently mandated trails should be constructed. A good example of this is a proposed trail from the western end of Eielson Bluffs to the Thorofare River (known also as Otter Slide), a trail that would likely erode quickly, even with the best construction methods.

### **b. South Denali and other gateway lands:** See our suggestions above.

## **3. Comment on allowing bicycles and pets**

### **a. Denali Park Road-accessible areas:**

#### **i. Family pets, such as dogs, cats, etc.**

Family pets should not be allowed on any trail, formal or social, outside of the headquarters area. In the headquarters area, family pets should not be allowed on any

formal trails outside of the immediate trail system near Riley Creek campground and the access trail to Nenana Canyon. Over time, allowing pets on these trails lessens the natural experience of all users, creates impacts from domestic animal waste, and promotes damaging wildlife encounters.

**ii. Bicycles.**

Bicycles could continue to be allowed on the access trail between the Denali Visitor Center and the Nenana Canyon, and on the park road and in the residential area of park headquarters and C Camp, and along the Parks Highway where it traverses the park. Bicycles could also be allowed on mining access roads in the Kantishna area and along the park road in Kantishna, but not on any formal or social trails in that area.

Otherwise, bicycles should not be allowed on any formal trails or off road anywhere on the northside of Denali National Park.

**b. South Denali and Gateway areas:**

- i. We do not favor use of bicycles anywhere in the National Park backcountry,** however on state lands and lands cooperatively managed, routes for bicycle use could be established. Any planning must keep in mind the innate conflict, on any single trail, between the use of bicycles and hikers or wheelchair users. There is the potential for considering development of bicycle-only routes or trails, if the funds for their establishment and maintenance exist, but not in National Park backcountry.

**4. Comment on Construction and Maintenance standards and signage**

**a. Signage**

We oppose the use of interpretive signage along any formal trails. We support only the amount of signage needed to provide directional information. The park itself is its own best interpretation. Signage at rest stop trailheads could be acceptable, but once folks are travelling beyond trailheads, no interpretive signage is needed or appropriate.

**b. Maintenance standards document**

- i.** The periodic revision of the ‘Denali Trails Plan, Routine Maintenance, Repair and Operating Standards’ document should be open to public scoping.
- ii.** The document should include reference to the overall vision of no formal trails in the wilderness/backcountry. It should make reference to standards developed under the BCMP (2006) for mitigation and monitoring of social trail formation.
- iii.** It would be preferable for the document to be titled “Denali National Park Formal Trails Program,” since only formal trails should be subject to maintenance activities.
- iv.** ‘Class 1’ trails- some of these are social trails, not authorized formal trails. This distinction is important, since the maintenance of social trails is not approved under current planning intent.

## 5. Comment on winter trails and river trails

### a. Denali Park Road:

- i. The trial winter plowing to Mile 12 (Mt. Vista Rest Stop) instituted in 2014, should not be used to authorize the establishment of any winter routes, trails or any infrastructure to support winter use beyond what is already there. If, at the end of the trial 3-5 year period, there is some interest in maintaining the plowing, that is the time for considering trails.
- ii. Headquarters and Murie Science and Learning Winter Visitor Center Area – routes for cross country skiing or snowshoeing could be set. Use of bicycles should remain confined to the park road and the access trail from the Denali Visitor Center to the Nenana Canyon
- iii. It is not necessary to identify or establish “river trails” at Denali, winter or summer.
- iv. If NPS chooses to regularly set up temporary infrastructure, even if it is located along the park road, to support dog mushing concession activities or NPS dog mushing activities, this must be approved through a NEPA process.

### b. South Denali and gateway areas

- i. Within the south additions, as noted above, we urge NPS to control recreational snowmachine access through defining “traditional activities” as it did for the core park in 2000, and to establish corridors for snowmachine use, as described in the BCMP of 2006.
- ii. It is not necessary to identify or establish winter trails.

## 6. Make suggestions on Nenana River Trail and Mt. Healy Overlook Trail

### a. DCC supports the construction of the Nenana River Trail.

This trail would provide opportunities for hikers both at McKinley Village and near the park entrance. It could be ADA –accessible for part of its length. There should be no allowance for bicycle use on this trail. We support a dedicated bike path next to the Parks Highway as it travels through Denali Park’s entrance area.

- ### b. All other formal trails not yet built should await a Formal Trails Plan (see our comment above).
- This would include a proposed Mt. Healy Overlook Loop Trail, a Trail from the western end of Eielson Bluffs to Thorofare River, and trails in Kantishna. It is time to put trail construction into an overall context and to examine its impacts on park budgets before further construction occurs.

Thank you for the opportunity to submit comments. We hope that this scoping will lead to protection of what is special about the Denali National Park backcountry.

Signed,

/s/ Nancy Bale, DCC Board of Directors