



March 25, 2023

### **DCC Comment on Nenana River Trails Environmental Assessment.**

The Denali Citizens Council supports Alternative 2, the Action Alternative in the Nenana River Trails Environmental Assessment. Our organization has long supported increasing opportunities for non-motorized transportation along the Parks Highway corridor through the Denali Borough, of which the segment between Riley Creek and the Nenana River bridge at Mile 230 of the Parks Highway is the most important. In addition, we have supported the philosophy espoused in the 1997 *Entrance and Road Corridor DCP* – which initially proposed trails in the Nenana River area – to provide additional visitor opportunities in the frontcountry. The proposed multi-use trail and hiking trail support these objectives.

We agree that Alternative 3 - waiting for the potential railroad realignment – is not in the best interests of the park and park visitors. The railroad project has no specific timeline, funding source, or decision to proceed. The multi-use trail is a priority project and should not be put on hold indefinitely.

We do not believe the campsites described in Alternative 4 are needed, and agree that the extra administrative requirements and costs make the addition of this infrastructure undesirable.

Here are a few other specific comments and observations.

#### **Entrance Fees**

We found the discussion of fee collection on page 11 to be the only objectionable part of the EA. NPS does not presently attempt to collect fees for use of the Oxbow Trail, nor for snowmachiners entering the park on the south side of the Alaska Range, nor for people hiking in at Bison Gulch, nor for a variety of other park access points. Particularly for trails that are intended to be transit corridors as well as recreational facilities, the imposition of fees would be counterproductive. We see no reason that user fees need to be collected in this area, and view them as detrimental for a number of reasons.

- 1) Fees would discourage cyclists from using the multi-use trail for transit, whether through-cyclists on the Parks Highway or local users just trying to travel between the McKinley Village area and the park entrance or Nenana Canyon. Some cyclists would choose to stay on the less-safe highway shoulder if they had to pay to travel on the trail just to reach



the same destination. The same argument is true for pedestrians, although the distance is great enough that relatively few will walk the entire trail for other than recreational purposes.

- 2) User fees are inherently inequitable. Those to whom every dollar makes a difference in their household budget will choose to recreate in places that do not charge fees. While people traveling from other states or countries will not find the park entrance fee burdensome in the overall context of their trip expenses, the family traveling from Wasilla to Fairbanks that just wants to take a quick hike might evaluate their willingness to pay differently. Seasonal workers who are saving money to cover off-season expenses likewise would be tempted to choose recreational activities that do not cost extra. Those of us who don't have to worry about every \$15 expenditure forget that there are those who do.
- 3) The National Park Service has for many years wanted to attract more diverse visitation. This trail is an opportunity to do so at Denali, particularly for local residents and Alaskans. But if there is a user fee these groups will surely avoid these trails just as they do the rest of the park, choosing to recreate on the freely-accessible public lands nearby.

Denali is an expensive national park to visit for those who wish to travel the park road. NPS should at least allow the crumbs of the Denali experience to be had at no charge. We would like to see NPS commit to keeping these trails fee-free.

### **Large Groups/Guided Groups**

The EA is not specific on what standards would be applied for large groups and guided groups on these trails. The *Backcountry Management Plan* does not apply, since this area falls under frontcountry zoning. Unlike the Triple Lakes Trail where the BCMP limits both group size and large groups, there is no comparable guidance here because the Frontcountry management zones do not provide any, to our knowledge. This area is presently zoned "Backcountry Day Use" but presumably the trails themselves would be rezoned as "Pedestrian" or "Hiker."

We would like to see some standards for large groups and maximum group size included in the EA and plans for these trails. There should also probably be some discussion of management zoning.

### **Shuttle**

Has NPS given any more thought to the establishment of a shuttle system to ferry hikers back to their starting point if they wish to hike the trail one-way? NPS has periodically investigated the establishment of a shuttle system connecting the park entrance to the Nenana Canyon and McKinley Village commercial areas, or even further afield to Healy, Carlo Creek, and Cantwell. Could NPS consider calling for at least a trailhead shuttle as part of this plan, even recognizing that it would take additional work to implement? As far as we are aware, there is no existing NPS plan specifically calling for such a service, but it would make sense as part of this effort.



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## **LNG Pipeline Corridor**

While the EA does discuss responses to the possible move of the Alaska Railroad out of the project area, it does not mention responses to the construction of the LNG pipeline. While the pipeline may never receive funding, its sponsors claim to have completed all permitting and compliance processes, making construction at least a strong possibility. Would trails shift to take advantage of the cleared pipeline corridor and avoid extra vegetation removal? Or would the corridor need to be marked off-limits to hikers? More careful consideration of and planning for the relationship between the trails and the potential pipeline seems warranted.

## **Wildlife Impacts**

The EA lacks much specific information about wildlife movement through this area, whether caribou traveling from the Yanert Valley or a variety of species moving north-south along the Nenana River valley. As development has increased in the Nenana River valley through the Alaska Range, we suspect it is becoming ever more challenging for wildlife to navigate this choke point. The information gap seems to point to a prime opportunity for future research. We would like to see the plan include this research as an action item.

Thank you for the opportunity to comment.

DCC Board Members: Charlie Loeb, Nancy Bale, Nancy Russell, Nan Eagleson, Steve Carwile, Scott Richardson