



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

ANILCA Implementation Program

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

Dear Mr. Striker:

The State of Alaska reviewed the scoping materials provided for the preparation of a formal trails plan for Denali National Park and Preserve, and an environmental assessment (EA) for various trail projects, including the Nenana River Trail, the Healy Overlook Loop Trail, and trail connections to an improved Day Use Area along Riley Creek. The following comments represent the consolidated views of state agencies.

Over the past several years, the State has expressed support for a number of proposals to construct trails and other improvements in the park's frontcountry. These improvements will provide needed opportunities for the public to engage in outdoor activities, and in some instances, restore damaged resources in areas of high use. We are similarly supportive of these new proposals, which implement past planning decisions also intended to create more outdoor recreational opportunities.

We also support taking a comprehensive look at Denali's trail system to contemplate additional use opportunities in other areas of the park and preserve, including new uses now that the park is actively promoting winter use. Denali hosts a variety of uses, including inholder access, subsistence and general hunting and trapping, as well as fishing. In many areas, trails are essential to accommodating these legal uses while protecting park resources, such as in the Cantwell area where several trails were designated for subsistence use of off-road vehicles. We recommend conducting extensive outreach to get input from all affected stakeholders before drafting the plan and EA, including subsistence users, inholders, commercial operators, and visitor industry representatives. In addition, consistent with planning requirements in the Alaska National Interest Lands Conservation Act,¹ we request an opportunity to meet with park planning staff to discuss the overarching objectives for the planning process and related issues.

The decision in the 2007 Finding of No Significant Impact for the Cantwell Subsistence Off-Road Vehicle Management EA stated that construction of the Bull River Access Trail and designation or construction of a Bull River Floodplain Trail/Route would be contingent upon the Service obtaining funding and working with the State of Alaska and other landowners to ensure access to the trail across non-Service lands. We welcome the opportunity to explore this issue further with the Service.

We also recommend taking a fresh look at the long-standing "no formal trails" policy in the backcountry wilderness, which for many can be a deterrent from experiencing Denali's backcountry but may also be a

¹ ANILCA Section 1301(d)

contributing factor to the amount of social trails documented along the park road.² Given the amount of visitor use that Denali attracts, the concentrated use along the park road, and the lack of formal trails in the backcountry, it is understandable that users are going to forge their own social trails. We therefore request the Trails Plan evaluate expanding the social trail strategies identified in the Denali Backcountry Management Plan³ to allow for the development of sustainable trails that enhance visitor safety and enjoyment while preventing resource damage and reducing long term maintenance costs.

Standard management practices, such as trail hardening and use of trail markers available to park units elsewhere, including in designated wilderness, should also be available in Alaska's park units where warranted, especially if doing so could avoid otherwise unnecessary area closures, public use restrictions, and undesired impacts to park resources. Taking a proactive, rather than a reactive, approach to managing visitor use impacts would aid the Service in fulfilling one of the Park's primary purposes "*...to provide continued opportunities, including reasonable access, for....wilderness recreational activities.*"

Thank you for this opportunity to comment. We look forward to working with the Service during this planning process. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan Magee
ANILCA Program Coordinator

² Informal Trail Status Along the Denali National Park Road Corridor 2012-2013.

³ 2006 Denali National Park and Preserve Final Backcountry Management Plan, page 49, Table 2-12.