

October 4, 2009

Dear Superintendent Anderson and the Planning Team,

On behalf of the board and over 300 members of the Denali Citizens Council, it is my pleasure to comment on the proposed Savage Area Trails EA, released on September 4, 2009. Our members have been involved with park planning and policy implementation since the mid 1970s. We are grateful for the opportunity, through NEPA, to participate in public process. As you know, our mission has always been to advance and protect the natural integrity of Denali National Park and Preserve.

We would prefer that NPS continue to administer Denali in a way that honors its tradition as a “trail-less park” This mandate appears in print in the 1985 draft of the General Management Plan (p.35):

“The park intends to maintain primarily a ‘no formal trails’ policy for the designated wilderness area on the north side of Denali... The no trails policy will be extended to include the northern additions to the park wherever possible. Along the park road corridor and near the park entrance, the existing short loop trails will be maintained for continued use.”

Such a policy recognizes that some interpretive trails are appropriate near the park road. And we agree. However, a line should be drawn on construction of built trails that require disturbance of acres of land and continued maintenance through the years. Though a built trail may be excused as a way to mitigate social trail formation, every built trail brings its own impacts. Granted, there are other built trails in the park at this time, the Healy Overlook Trail, the Triple Lakes Trail and the Eielson Visitor Center Ridge Trail.

However, we do not favor either of the alpine trail options listed in Alts 2 and/or 3, as the need for them has not been sufficiently proved, and historic direction against built trails in a Wilderness Park should retain a strong influence on park policy. This does not mean that we are against hiking or hikers. However, NPS should not feel that it shirks its duty by not making for easy access to the backcountry.

The points below are meant to provide more insight into the views of DCC members regarding this proposal.

1. Planning intent - Savage Alpine Trail (or Alpine Meadow Trail) - This proposal takes its lineage from the 1997 Entrance Area and Road Corridor EIS, but need not be a highly constructed trail in order to satisfy the planning intent.

The “Savage River extended loop trail” (the ancestor of this proposal) is mandated in the 1997 EIS and depicted on page 53 of that plan, although the route is significantly different. This proposal will be a “Hiker subzone.” The definition of Hiker subzone in the 1997 EIS is as follows: *“This subzone provides a sense of being immersed in a natural landscape, although most comforts and conveniences are within 5 miles away. Visitors must commit some time and physical exertion and the only facilities present are unpaved trails or marked routes.”* In our view, this alpine trail can remain a route, not a built trail, through most of its extent and retain its

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consistency with the 1997 plan.

2. **Mitigation of social trail formation is not adequate justification for building either one of the Savage alpine trails. NPS already has a system in place for managing social trail formation.**
We must ask, is the entrance area to be exempted from the social trail management scheme documented in the consolidated GMP? Everywhere there are social trails, is a large, constructed trail project to be the main option? The EA does not give detailed information on just where these social trails are located near the Savage River check station. To what elevation are social trails a problem? Perhaps building of the Phase II Savage Alpine trail already mandated in previous plans will be sufficient to contain them. What other strategies short of constructing a long trail that will itself be an impact will ameliorate the problem?
3. **Provision of expanded visitor opportunities - Is a 3.7 mile long constructed trail the best tool for management of large numbers of visitors? The park itself presents backcountry hiking opportunities without the need for built trails.**
It is not clear in the EA that people have asked for extensively engineered and built trails as a necessity for their stay in the park. The EA states, on page 39, "The finished trails would provide many connections to new recreational opportunities in the Savage area, both for the 6,000-10,000 campers annually staying at the Savage Campground, as well as for the 50,000 visitors per year expected to use the Savage Rest Stop and Interpretive Trail and Savage Alpine High Trail system." Are 50,000 visitors really expected to use this Savage Alpine High Trail system? That would be 500 people a day in a 100 day season.... The numbers are not broken down. The writers of the EA ought to consider more accurate prediction of how many would use this trail. It certainly should NOT be built if 500 people per day will use it.
4. **Maintenance costs - The alpine trails will require significant maintenance because much of their extent is on 20% or steeper grades, or through brushy areas.**
These trails will be subject to erosion and/or overgrowth, depending on section. The trail across the alpine meadow will have additional problems because of the nature of wet soils. How much will it cost to maintain this and others in the growing network of trails in the entrance area? The EA should address this.
5. **Wildlife impacts were barely touched on with respect to the Alpine trails in this EA.**
For example, raptor nesting could be affected by increased human use along parts of the high trails. How will NPS monitor for wildlife impacts?
6. **If one or the other of the Alpine Trails is built, please consider the following suggestions:**
 - a. Limit group size to 12 or fewer individuals.
 - b. Close the trail in spring until the ground is dry.
 - c. Keep the trail width 18 inches.
 - d. Avoid the Alpine Meadow route. It requires more extensive construction to shore it up in wet areas and has a greater impact on the view shed of the park road than the High Alpine route.
 - e. Do not construct the 1000 feet of ADA trail at the eastern terminus of either Alpine Trail. Use of motorized equipment to build and maintain and the 6 foot width of this trail are inappropriate in Wilderness.
 - f. Consider building the Savage Alpine High Trail, Section A only. This would provide additional opportunities for views and social trail amelioration. Then, pay attention to social trail formation and trail use over some years.

- g. If appropriate, build the Phase 4 spur down to the Savage River (mapped in the 1997 EIS) in preference to the high alpine trails. This is the "minimal build" option.
7. **The trails described in the Actions Common to Both Action Alternatives (p. 14) are acceptable**, because they promote safety and help reduce multiple trail formation in a heavily used area, are not long, and are built, in general, on already disturbed areas. They include the Savage Rest Stop Interpretive Trail, the Savage Campground to Rest Stop Connector Trail, the Savage Rest Stop to Park Road Sidewalk, and the Savage Roadside Path. We support efforts by NPS to provide ADA access, and these are logical areas for provision of such service. We also support construction of the Savage Rock loop trail, but it should be kept as narrow as can reasonably be done within the terrain. Closing of this loop remains within the historic mandate for “short loop trails” close to the park road.

We urge NPS not to build 3+ miles of constructed trail in Wilderness in order to fulfill mandates of the 1997 EIS. The agency frequently uses discretion on how to fulfill planning mandates. We ask you to use this discretion again.

In summary, DCC -

1. Opposes the Savage Alpine High Trail or Alpine Meadow Trail, because they are simply not justified by evidence given in the EA and need not be built to the specifications of this EA in order for park visitors to have an adequate range experiences in the entrance area.
2. Supports a staged approach to the Savage Alpine Trail issue, as we described in our suggestions above (**in 6e,f,g**), as the best and most minimal approach. Such an approach will avoid much of the impacts listed in the EA, including most of the wetlands impacts, and the impacts from using mechanical tools in Wilderness.
3. Supports the ADA accessible trails listed in the **Actions Common** section (and also the completion of the Savage Rock loop trail) as fulfilling the planning intent of the 1997 EIS. We do not support the ADA accessible trail that would constitute the terminus of either one of the Savage Alpine Trails.
4. The DCC alternative would be less expensive, require less gravel, fewer Wilderness impacts, and would, in the absence of any substantive data to the contrary from the EA, retain abundant opportunities for hikes in the entrance area of Denali National Park. The park is spread out before us. Let the vigorous backcountry visitor be free to choose.

Thank you for the opportunity to comment.

Sincerely,



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