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Superintendent, Denali National Park
PO Box 9
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Re: NPS Seeking Input on Eielson Area Informal Trails

Dear Superintendent Striker,

On behalf of the board and over 300 members of Denali Citizens Council, thank you for the opportunity to offer our suggestions regarding the public scoping for the Eielson Area Informal Trails. This year, a survey of our members ranked issues in Denali, specifically protecting Denali's backcountry experience, as one of their top priorities.

We agree that visitor safety is important and that impeding further resource damage in the Eielson area is of utmost importance. We also recognize that trails "from Eielson Visitor Center to Gorge Creek" and "from the west end of Thorofare Bluffs down to the Thorofare River bar" were both identified in the Backcountry Management Plan (BCMP). We want to offer several thoughts for the NPS to consider in this scoping process.

It is important to remember that Denali National Park has a "no formal trails" policy for the backcountry

Since the publication of the original Backcountry Management Plan in 1976, managers at Denali have recognized the need to regulate access in order to maintain the Wilderness character of the two million acre core Wilderness Park. This is not trivial. Access, although important, must be managed to prevent damage to fragile wilderness resources. Currently, Denali National Park's Wilderness has a "no formal trails" policy. References throughout Denali's planning history point to this fact.

1. Consolidated General Management Plan, p. 65-66: "The park intends to maintain primarily a 'no formal trails' policy for the designated Denali wilderness area. Generally, hiking routes in this portion of the park follow natural drainages and therefore do not require designation or maintenance."
2. Final EIS Backcountry Management Plan, p. 72, which specifies certain trails to be formalized, and commits to no new formal trail creation beyond these new trails and what has already been identified in the 1997 Entrance Area and Road Corridor DCP for Denali.
3. Record of Decision: Denali Backcountry Management Plan 2006, p. 8: "Noting that wilderness in ANILCA is defined the same as in the Wilderness Act (Section 102[13]), all of the action alternatives identify the characteristics of the unique Denali backcountry experience, including the absence of permanent human structures, privacy and isolation, self-sufficiency, and minimal shelter or assistance from the devices of modern civilization among others. The modified alternative 4

implements this general guidance by restricting backcountry facilities such as trails or campsites to areas of existing resource impacts, continuing and extending a “no formal trails” policy throughout the backcountry, and omitting the possibility of public use cabins or new administrative camps.”

Stick to trails identified in Backcountry Management Plan

In addition to the Gorge Creek and Thorofare River trails, the BCMP identifies social trails in Kantishna, a loop at Wonder Lake, and a connection between the Healy Overlook and Taiga Trails. It goes on to state: “No other new summer or winter trails would be added besides those identified in the 1997 Entrance Area and Road Corridor DCP and the 1997 South Side Denali DCP. **Elsewhere in the park and preserve, the National Park Service would maintain a “no formal trails” policy.**” (p. 72, *Final EIS, Denali National Park Backcountry Management Plan*)

The potential new trails identified in the BCMP were a product of substantial public scoping and planning efforts. Considering that NPS still has numerous options identified in this long-term vision for backcountry management, consideration of construction of trails not previously identified would be a piecemeal approach, and untimely. We encourage NPS to stick to the identified potential facilities in the BCMP until a more thorough inventory of Wilderness social trails, and a plan to address them, is undertaken.

Further, of the two trails identified in the BCMP for this scoping process (Gorge Creek and Thorofare River) we would like to see each of these projects addressed with its own environmental compliance documents. The magnitude of temporary impacts to visitor experience will be significant considering that the work (which we assume will propose helicopter use and motorized equipment) would cover such a large area. Also, construction projects should be paced in order to comply with Vehicle Management Plan indicators and standards. For all of these reasons, it seems unwise to roll out the development of two Wilderness trails at once.

It seems likely that the trails that lead from the Eielson Visitor center down to Gorge Creek see the largest number of visitors. Some sort of formal trail will be hard to eliminate by the very fact that the visitor center is a destination. With a way down to the river bar, people will naturally want to go down, and backcountry users will want to take those routes. Despite its effect on the wilderness experience, construction of this trail down to the river bar will help to prevent the erosion that is occurring, and give backcountry users for all units south of the road between Eielson and Grassy Pass a place from which to start. It would have to be a well-marked trail on both ends for it to be effective, and the alternate informal trails closed and re-habilitated.

In the meantime, for the trails that emanate from the Grassy Pass area, perhaps a greater effort can be made to work with the Camp Denali Lodge and Joint Ventures concessionaire bus drivers to eliminate those areas as stops from which groups and individuals can start their trips. These areas can also be re-habilitated and signed to

prevent further damage, if resource damage is the issue. Monitoring in the area could be used to determine whether or not trail construction is needed.

Follow existing Guidelines to Address Social Trails

The BCMP provides guidance for addressing social trail proliferation (see *Decision Guide for Addressing Social Trail Formation*, p. 52, *Revised Draft Denali National Park Backcountry Management Plan*). Presently, backcountry user education is often inadequate for day users and campers at developed campgrounds. Many visitors who purchase a bus ticket and plan to day-hike are given scant information about backcountry travel. Drivers, who are potentially a critical tool for educating backcountry users, often drop visitors off at social trails, exacerbating the damage.

We support increased visitor and transit driver education to help NPS achieve standards outlined in the BCMP to manage access and social trail formation. Maps could be distributed to drivers, with encouragement (or requirements) to avoid directing visitors to specific locations. Printed “Leave No Trace” materials (such as the “Leave No Trace” hang tags) could be distributed to hikers and campers getting off a bus.

Because Eielson Visitor Center is a major destination for many hikers and travelers, closing informal trails may not be an easy solution. For the trails leaving the visitor center, heading for the Alpine Trail, the start of the trail needs to be more clearly marked, the developing informal trails re-habilitated and signed, and rangers dedicated to roaming the areas to educate visitors on trail use and etiquette.

A driver could easily relay NPS concerns to visitors about social trail formation and avoidance as they pull into the Eielson Visitor Center or if they request to be dropped off near these areas of concern. It is commonly relayed to visitors in the Entrance Area (at the Denali Visitor Center) to stick to trails where developed trails exist. This should also be the norm around Eielson Visitor Center.

If increased education does not remedy the situation, we support temporary closures to allow for conditions to improve.

Consider economic impacts of Wilderness trail maintenance

In effect, trails are permanent structures. They require maintenance and upkeep, which means that besides the cost to build them, there is also a cost associated with just having them in good, safe condition the public to use. What are the projected estimates of yearly costs for trail maintenance for the 4000 feet of potential trail in the Eielson area?

We are concerned that the park may see trails as a solution to the problem, but not take into account the commitment to the public for the life of the trail (which we can assume is forever), and the potential loss for other NPS programs by committing to maintaining these trails indefinitely. If a trail is built and not properly maintained, it could be a greater source of degradation to the resource than a social trail would in the long-term.

Ultimately the park must ask itself, at what economic cost will solving these problems with formal trails exhaust the budget? Wouldn't a focus on preventative education (i.e. working with the lodges, bus drivers, and having rangers on the ground walking around and talking to people) accomplish the same thing at much less cost?

Proceed with caution when creating formal trails

Designated formal trails are also like permanent structures in the way that they affect the park's wilderness character. The "Backcountry Hiker management area" applied to formal trails allows concentrations of hikers that exceed the standard for hiking concentrations on informal trails and in the trail-less wilderness. Therefore, with formal trails comes greater use, which is good in the sense that it gets the public out of the buses and into the park, but the concentrations of visitors it encourages were never meant for the Wilderness-designated backcountry.

The construction of trails also has detrimental effects, like those that this very scoping addresses - shortcuts and informal trails that branch off from the main trails (what is perceived as the easiest route, is not necessarily where the trail goes). Thorough planning, despite the best intentions, may actually worsen the existing problems, as evidenced by the number of informal trails that emanate from recently created trails in the area surrounding the Eielson Visitor Center.

We support limited use of formal trail creation as a way to remediate the problem of visitor-caused resource degradation in the areas that have been previously identified by park planning documents.

When formal trails leave development zones and travel into designated Wilderness, they must be designed to provide minimum intrusion upon the landscape, minimum construction requirements and minimum maintenance needs. In other words, they must undergo "minimum tool" analysis.

For the longer term, develop a "Wilderness trails inventory and management plan"

The reality is that social trail formation exists along the entire extent of the Denali Park road. Some of this social trail formation is described in the "State of the Backcountry Report -2012," recently published by Denali staff as a final draft document. The report states (p. 16) that indicators of social trail development should elicit "concern," and that the problem is potentially worsening. We understand that NPS has been preparing an inventory of social trails along the park road. We agree that concern over social trail formation is warranted and that action to protect resources is needed.

In fact, dealing with the development of social trails, not only in areas connected to major rest stops, visitor centers or developed areas, but along the entire park road, has become a major planning need. We recommend a coordinated planning process to establish how NPS intends to maintain a "no formal trails" policy into the future.

We recommend that NPS place this need in the forefront of its planning agenda. In addition, we urge NPS to consider the problem of social trail formation when other infrastructure projects are considered, including any future enhancements at Toklat, and even increases in buses along the road. Whenever park managers bring together large concentrations of people along the road, social trails will be the inevitable consequence.

Finally, we note that in the Final EIS for the Backcountry Management plan (2006, p.53-54), NPS committed to address social trail formation through establishment of a “working group of NPS staff, guided hiking concessioners, MSLC staff and associated non-profit partners and commercial services....to address specific problem areas through coordinated action.” If this group has not already been formed, we recommend that it be formed and that its deliberations be public.

Thank you for the opportunity to provide scoping comments on Eielson trails. We are happy that NPS is ready to address the social trails in the Eielson area, and we hope NPS is also ready to address the wider issue of wilderness trails policy in Denali National Park.

Sincerely,

/s/ Hannah Ragland and Nancy Bale

DCC Board of Directors