



PO Box 78, Denali Park, Alaska 99755

January 22, 2014

Denali National Park and Preserve Superintendent

PO Box 9

Denali Park, AK 99755

RE: EA for Horseshoe Lake Trail Improvements and Additions

Dear Superintendent Striker,

On behalf of the board and members of the Denali Citizens Council (DCC), thank you for the opportunity to comment on the proposed reconstruction of the Horseshoe Lake Trail, Alt 2 of this EA. Many of DCC's over 300 members live in Denali's gateway communities and work at the park. Our members value the NPS trails as ways to enjoy landscapes and ecosystems in the entrance area. Trails in the entrance area are different from those in the backcountry in that there is an expectation of greater use. The EA notes that over 200 people per day travel the Horseshoe Lake Trail. Its nearness to hotels and the Wilderness Access Center makes this trail available to the greatest variety of Denali visitors, including independent day-visitors who never leave the entrance area, local residents and employees, hotel guests and NPS or MSLC-guided visitors. However, DCC feels that wherever they are located, trails must allow visitors the opportunity to immerse themselves in a natural setting with minimal distractions. Management to attain that goal in the entrance area of the park is challenging, but we believe it is vital to avoid diminution of park values.

We appreciate NPS' effort, with this EA, to remediate the damage from numerous social trails at Horseshoe Lake and to enhance visitor experience with a new loop trail. We think that the closure of redundant or overly impactful social trails is important for resource protection, especially the closure of trails that approach the beaver dam and lodge. We appreciated being asked to comment in early scoping activities two years ago and note that many of our concerns and suggestions were incorporated into the Action Alternative of this EA. We generally support the route proposed by this EA and shown on the map on page 12 of the EA.

Our comments will center around three topics, habitat, safety and visitor experience.

1. Habitat

- a. The EA should state just how many feet of social trails are estimated to be re-vegetated under this plan. Such a figure could be incorporated into Table 1 on page 10. We assume NPS plans to re-vegetate and discourage the use of all the social trails mapped on page 5 that are not planned to be incorporated into the new trail. Is this an accurate assumption?
- b. We appreciate efforts described in this EA to prevent impacts to nesting birds by any cutting or disturbance of trees or nesting areas.
- c. An estimation of the number of helicopter trips required for this project would be appreciated, rather than simply a statement that care would be taken with use of helicopters. We do not see much need for more than a trip or two. Is that a fair estimation?
- d. Interpretive signage – we are definitely in favor of letting resources speak for themselves. Please reconsider all interpretive signs. Signs should be limited to those that will keep visitors from using social trails. If interpretive signs must be used, limit them to areas with standing room, such as the overlook or beaver dam viewing areas.

2. Safety

- a. The early, existing section of the trail, from the railroad to the forest floor, has steep sections and tripping hazards associated with roots. Remediation of more problematic areas here is advisable but not discussed in the EA.
- b. The formalized social trail along the western edge of the lake will be underneath a steep slope immediately below the Alaska Railroad. We have some concerns regarding protection of the trail from slope erosion and falling rock, as sections of this slope are unstable.
- c. Walking near the railroad at the beginning of the hike remains a safety issue. We appreciate that NPS has committed to continue to explore new options to eliminate this segment of the trail.

3. Visitor experience

The EA considers the impacts of the Action Alternative to be “beneficial” to visitor experience, through provision of increased opportunities for trail hiking. However, any encouragement of use offered by creating this new trail must also be considered as potentially damaging both to resources and to visitor experience because of the location of

the Horseshoe Lake Trail so near major concentrations of visitors. We make three suggestions regarding NPS actions to reduce such potential damage.

- a. **No commercial hiking groups** other than MSLC or NPS-sponsored hikes.
- b. **Usage limitation** during peak visitation days and also if rainy weather creates dangerous conditions. NPS should monitor the use of this trail through counters and staff. While not something likely to be done very much, limitation of access should be considered. Visitors, when surveyed, have noted that having to share a natural area with too many others diminishes their experience. We'd hate to see the use of tickets or entry gates, however if the trail is overused and the experience deteriorates, such techniques may need to be considered and would, we think, be appreciated by users.
- c. **Consider limits on hiking group size for entrance area trails.** We understand that establishing a limit for hiking group size in the entrance area may be beyond the scope of this EA. However, consideration of damage to entrance area trails by larger hiking groups and of large group effects upon visitor experience are within the scope of this EA. We hope that, in the FONSI for this project, NPS will commit to monitoring group sizes on well-used trails in the entrance area, with an eye to determining impacts and making recommendations. Such monitoring is essential in view of inevitable, predictable increases in visitation at the entrance to Denali.

We appreciate your dedicated staff and trail crew. We think the Horseshoe Lake area is a special treasure and we worry that this treasure could be irreparably damaged without careful management into the future. This EA does a good job of proposing remediation to cover existing damage; however it opens the area to increased use without establishing adequate monitoring and safeguards to prevent the next generation of damage. We encourage NPS to be proactive about protecting entrance area trails!

Sincerely,

/s/ Nancy Bale, DCC Board

DCC Board of Directors

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