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October 30, 2015

Mr. Donald Striker
Superintendent,
P.O. Box 9
Denali National Park & Preserve, AK 99755

Re: Scoping comments: “revisiting Denali’s trail vision”

Dear Mr. Striker:

This letter is in response to a notice for public comments on a proposed trail planning process for Denali National Park & Preserve. Wilderness Watch is a national non-profit conservation organization with a primary focus on appropriate administration of our nation’s National Wilderness Preservation System.

We are concerned by the manner in which the proposed process has been introduced. The notice states that: “The park is interested in revisiting its vision for trails as it approaches its Centennial in 2017.” It also claims that because the General Management Plan (GMP) was completed in 1986 and has been amended several times, that a new vision is now necessary. However, the notice does not provide any specific examples to justify that “a new vision” is necessary. The notice also suggests that due to social trail formation in the designated Wilderness, a new vision is needed. We disagree with these rationalizations, and contend that the “no formal trails” policy for the Denali Wilderness is exactly the right policy. It must be retained, and steadfastly implemented.

Background and History: In considering a way forward, we suggest “revisiting” Denali’s history, and also take stock of recent trends that jeopardize its wilderness character. Mt. McKinley National Park was founded out of a concern for preserving the rich and diverse wildlife that early explorers found along the north side of the great mountain. More than any other person, it was Charles Sheldon, author of the inspiring book entitled: Denali Wilderness, who influenced the establishment of the park in 1917. Like several of our early National Parks, Denali’s history is also linked to the railroad era. Soon after the Alaska Railroad from Seward to Fairbanks was completed, construction of the park road was initiated. While the road was a significant intrusion into Sheldon’s beloved Denali Wilderness, it presents both unique opportunities for park visitors hoping to see iconic wildlife in a wilderness setting, as well as serious implications for the future of the Denali Wilderness.

It was the renowned field biologist, Adolph Murie, who advocated most effectively for preservation of Denali's wilderness character. When extensive development plans for the Park were proposed in the Service's Mission 66 initiative, which was envisioned to celebrate the 50th anniversary of the National Park Service, Murie began to speak out against the plan and advocate for preservation of Denali's wilderness. The open tundra and subalpine environments north of the Alaska Range divide, that Murie knew so well, offers a unique opportunity for visitors and hikers to freely wander, explore, and discover the magic of Denali's Wilderness. It was Murie's vision for preserving these rare qualities that ultimately led to the Park's first backcountry management plan in 1976. A central concept for the plan is the "no formal trails" policy for the area beyond the road and headquarters. This policy remains a major cornerstone of the current Back Country Management Plan (BCMP) which has guided stewardship of the Denali Wilderness and wilderness eligible lands of the Park since 2006.

Additional protection of wilderness came with passage of the Alaska National Interest Lands Conservation Act (ANILCA) in 1980 that designated nearly all of the original Mt. McKinley Park as Wilderness. Section 4(b) of the Wilderness Act requires that: *"each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character."* Thus, NPS is required to preserve the wilderness character as it existed on December 2, 1980, when ANILCA was signed into law. The General Management Plan completed in 1986 included a Wilderness Suitability Study, required by Section 1317 of ANILCA, which found that nearly all of the lands added to Denali Park and Preserve to be "suitable" for designation as Wilderness. National Park Service policy for management of wilderness suitable areas (6.3.1) states: *"In addition to managing these areas for the preservation of the physical wilderness resources, planning for these areas must ensure that the wilderness character is likewise preserved. This policy will be applied to all planning documents affecting wilderness. The National Park Service will take no action that would diminish the wilderness eligibility of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed. Until that time, management decisions will be made in expectation of eventual wilderness designation."* Thus, the NPS has a legal responsibility to preserve the wilderness character of a vast majority of lands within Denali National Park & Preserve.

Recent Construction of Trails in the Denali Wilderness: We are very concerned about the recent trend in construction of trails in the Denali Wilderness. Examples include the Savage canyon trail (completed in 2000), trail from Savage River to Savage campground (completed after 2006), Primrose pullout loop (completed in 2000), trail north of Eielson (completed 2004), McKinley bar trail (completed in 1998). These constructed trails are inconsistent with the "no formal trails" policy. In addition, we are concerned about the possibility of further "mission creep" that could lead to more trail construction in the Denali Wilderness, or wilderness eligible lands, especially if the Park's trail policy is "revised" in a manner that may facilitate violation of the Service's responsibility to preserve wilderness character. Furthermore, Wilderness Watch is opposed to any revision of the "no formal trails" policy that would weaken protection of wilderness character or lead to construction of trails within designated Wilderness. We are also opposed to any proposed trail, such as the Mt Healy loop trail, that occurs within the Denali Wilderness.

Monitoring and Management of Social Trails: We are also very concerned that the issue of potential resource damage associated with social trails may be conflated through a faulty trail planning process to assist in justifying construction of trails in the Denali Wilderness. Instead, the NPS should be fully aware of and implement provisions in its current Back Country Management Plan (see Table 2-12: Decision Guide for Addressing Social Trail Formation, page 49 of the BCMP). It is our understanding that this decision guide has not been fully implemented since completion of the BCMP in 2006. We highly recommend that this decision guide be vigorously applied to prevent further social trail damage, and to enable disturbed areas to recover. This step alone can go a long way to negate the potential need for construction of trails in the Denali Wilderness.

We also encourage increased efforts by Park staff to educate both backpacking permittees and day hikers about various practices, such as dispersed hiking, that are aimed at reducing social trail damage. This approach may be more effective if day hikers are required to receive briefings by Park staff before embarking on hikes. To assure such briefings, a day hiking permit system may be necessary. It is our understanding that much has been accomplished through educational efforts, and if these programs received more funding and support, social trail damage can be prevented. This option must be given full consideration as it is more cost effective than construction and maintenance of formal trails.

Preserve Denali's Wilderness

Some of our members were fortunate to have visited Denali in the 1960's and 1970's, when the number of Park visitors was small, compared to that of today. Over the years they have witnessed many changes that have diminished the wilderness qualities of Denali. Today, enormous economic interests apply pressure for more and more accommodations and facilities. We have already mentioned the proliferation of constructed trails in Denali Wilderness, in violation of the "no formal trails" policy, and inconsistent with preserving wilderness character. Commercial tour bus traffic combined with public shuttle bus activity has increased greatly, requiring more rest rooms and parking space. Now within the road corridor, we find a "temporary" bookstore housed in an unsightly structure to accommodate sales to commercial tour groups because the operators choose to not stop at the visitor center and bookstore located in the headquarters area. This is unacceptable management on the part of the National Park Service. In order to support expansion of commercial dog sled tours during winter, we also find another unsightly frame structure along the Park road between Eielson and Wonder Lake. This intrusion could easily be eliminated by requiring the permittee to use a temporary shelter that can be removed at the end of the winter season. We wonder how many more incremental degradations caused by poor stewardship decisions will occur, unless there is a change in direction at Denali.

We encourage the National Park Service to celebrate the 2017 centennial with a recommitment to preserving wilderness character, which is the true heart and soul of Denali.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Fran Mauer
Alaska Chapter Representative
Wilderness Watch

Cc Molly McKinley