



Kantishna and Wonder Lake Area Plan: Range of Proposals for Public Feedback Summary Report

*Denali National Park and Preserve
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Introduction

The National Park Service (NPS) sought feedback on a range of proposals for the Kantishna and Wonder Lake areas of Denali National Park and Preserve August through October of 2019. The Kantishna and Wonder Lake Area Plan Range of Proposals for Public Feedback (Plan) provided an overview of potential facility development proposals for consideration, as well as potential associated actions related to park management, visitor experience, and guided services. This document is the summary of the 338 correspondences, and the resulting 1,697 comments received. It is not a response to any of those comments, nor does it provide any environmental analysis or decisions.

Public Outreach

Initial Outreach

The NPS requested feedback from stakeholders about trail development in Kantishna over the last several years. The NPS began drafting an Environmental Assessment related to Kantishna recreation in 2006 but that effort was not completed. Since then, NPS has sought and received feedback about Kantishna and Wonder Lake trails during the Trails Strategy effort in 2016 and 2017. That effort highlighted the complexity and controversy associated with planning in the Kantishna area. Information and ideas from the Draft Trails Strategy were brought forward as the NPS sought additional feedback when this planning effort began in 2018.

Meetings

Two public meetings were held to share the proposals and allow an opportunity to answer questions directly. No public comments were collected at these meetings.

An open house was held at the Wonder Lake Ranger Station on August 21, 2019, between 11 AM and 9 PM. Approximately 32 individuals participated in the discussion.

A public informational meeting was held at the Murie Science and Learning Center on August 22, 2019, from 5 PM to 8 PM. Approximately 85 individuals attended.

Comment Period

The comment period was initially open from August 5 to September 17, 2019. Per the public's request to have time to finish the summer season before needing to review the Plan, the comment period was extended to October 31, 2019. There were 338 correspondences received online via the NPS Planning, Environment, and Public Comment (PEPC) site. Of the 1,697 comments taken from those submissions, 1,157 provided substantive feedback that could be

considered and incorporated into future planning and compliance documents. All comments have been reviewed and are included in the Summary of Comments.

Next Steps

Denali National Park and Preserve has completed initial public engagement on providing additional recreational opportunities in the Kantishna and Wonder Lake areas of the park.

The park's interdisciplinary team will consider comments and work with park management to refine and modify the planning scope for this project.

The park may then complete cultural, wetland and floodplain field surveys, a cost of operations analysis, and a capacity study.

With this information in hand, the park could then define proposed actions, create alternatives for consideration, and identify a preferred alternative. The environmental impacts of the proposed actions and alternatives would be analyzed in an appropriate environmental compliance process that would include public review and comment.

What We Heard

Correspondences were read, and individual comments within each correspondence were coded by topic. Comments were then sorted by topic and summarized by the NPS interdisciplinary team working on this project. The summary of comments is not a response or endorsement by NPS. These comments reflect public opinion or perception and are not stated as fact. These comments will inform the next stages of the planning and compliance for the Wonder Lake and Kantishna Area Plan. All comments are summarized below.

SU1000: Support Planning Effort

Those that spoke in favor of the plan, most notably the State of Alaska, extended their support to provide continued opportunities, including reasonable access, for wilderness recreational activities.

Other comments supported the effort but requested that the priority focus should be on formalizing and maintaining the well-used, accessible, and existing trails with resource damage. These comments suggested that the longer backpacking loops should only be considered after these priority trails are in place, and the park can take on additional trail maintenance.

Denali is the people's park, and that visitors should have easier and more affordable access to the Kantishna area. The shuttle system, rustic lodging, and group sites at Wonder Lake Campground were all mentioned as ways to improve access for all visitors.

Several comments added the caveat that they only supported development if it doesn't increase or decrease the number of visitors or the administrative footprint. Support was offered to remove and consolidate administrative sites, but only to serve current needs.

SU2000: Don't Support Planning Effort

The common themes for not supporting the plan included: the road is under pressure from geohazards and existing 2012 Vehicle Management Plan (VMP) standards; the effort would serve less than 2% of park visitors; existing and potential future deferred maintenance; funding for staff; Wonder Lake and Kantishna are too far to serve day-trippers; the motivation and need for expanded services aren't clear; Kantishna is not a draw for visitors and, independent travelers cannot be trusted to respect wildlife and wilderness character.

Other comments stated that the plan may degrade wilderness experiences; the proposed improvements are a waste of taxpayer dollars; more needs to be known parkwide about the visitor experience; new infrastructure could increase the value of private property, encourage further private development, and make it more difficult for the park to purchase properties eventually; and remoteness is what makes the Kantishna and Wonder Lake areas special.

Additionally, commenters stated the park is not mandated to maximize access to public land; mining history shouldn't be celebrated; the park shouldn't become Glacier/Yellowstone/Disney, and tourism is dependent on industries that contribute carbon emissions to the planet and could fluctuate with our economy.

The general solution offered was to further limit visitor access to the area through reservations or a lottery. One commenter encapsulated a general sentiment that "visitor needs and wants should be secondary to protecting wildlife."

Comment Summary by Code

The below structure mimics the structure of the Kantishna and Wonder Lake Area Plan Range of Proposals for Public Feedback document. Users should be easily able to reference either document to see the Plan language as well as the feedback provided.

Plan Chapter 1: Introduction

PM1000: Park Mission and Enabling Legislation

Many comments were in opposition to the plan based on their belief that it is incompatible with NPS Management Policy, the Alaska National Interest Lands Conservation Act (ANILCA), the NPS mission, and Denali's mission statement. Commenters stated that the facilities in the Kantishna area could impact resources and park values and have a detrimental effect on the wilderness character of the unit, a direct conflict with NPS Management Policy and Sec. 1316 of ANILCA. Commenters felt that development and increased visitation could negatively impact wildlife by disrupting travel corridors and altering habitat, which conflicts with the purpose of the northern park expansions under ANILCA to protect critical wildlife habitat and limit intensive visitor use in Kantishna and Wonder Lake. Commenters stated that the NPS mission to preserve resources and values "unimpaired" for the enjoyment of future generations should be interpreted to direct management strategies to focus on long-term sustainability and stewardship, not expanded visitor use. Commenters felt that the Plan's stated goal to "provide additional recreation opportunities" conflicts with Denali's mission to put the preservation of wildlife and wilderness values first, and its unique legacy of resisting political and commercial pressures to exploit and develop park resources.

PN1000: Purpose and Need

Several comments stated that the Plan valued recreation over all other resources and values. Others challenged the Plan's purpose as contradictory to earlier planning documents and the 1980 new park additions enabling legislation to protect a variety of wildlife species habitat, limit development and commercial operations, and maintain a wilderness-like feel. Some comments stated that NPS had neglected its commitment to purchase inholdings in the Kantishna Hills to inhibit further development and commercial opportunity. Comments request the NPS more clearly state the change in direction from previous planning documents and the desire to develop the area where increased visitation is not demonstrated. Some comments requested that land planning and protection of the natural resources be equally or more highly valued than recreation. Additionally, commenters felt that development in Kantishna and Wonder Lake should not come at the expense of services elsewhere in the park, and a future planning document needs to show that the development can be fiscally achieved and maintained. Some comments acknowledged that the purpose and need for administrative facilities for staff were satisfactory, but not for new recreational opportunities. Others noted that the Plan had the appearance of wanting to be a Development Concept Plan (DCP) but is missing land management planning.

Plan Chapter 2: Range of Proposals

MA1000: Park Management/Capacity

Comments were generally in opposition to the proposed increase in services and infrastructure in Kantishna and Wonder Lake. The Plan's estimate of current overnight and day use in the area was inaccurate (Wonder Lake Campground use is overestimated) and misleading (most of the day hikers are lodge guests). Comments suggested that visitor capacity should be based on what the resources can withstand without additional adverse impact and not based on demand. Denali is already in violation of the Code of Federal Regulations (CFR) limit on the number of vehicles on the Park Road and the 2006 Backcountry Management Plan thresholds for landscape modification, noise, and human encounters in the backcountry. NPS has already exceeded the capacity of the area, and increased visitation could further stress an already maxed out environment. The park does not have the resources to support and maintain additional visitation and infrastructure (including trails) in this area of the park. It should consider capping the number of visitors to retain a quality experience. Several comments stated that there is no evidence that the existing services are insufficient for current or future projected visitation (if Denali's 11% growth in visitation is projected forward for the next five years, the increase in new visitors to the Kantishna and Wonder Lake areas would only be approximately 1,200 more visitors by the year 2023), or that there is additional interest or demand for more or different services (such as guided backpacking or cultural interpretation). It is not reasonable to limit backcountry group size to two people because that could exclude most families.

MA2000: Park Management/Areas

There were comments in opposition to NPS maintaining Moose Creek Access Route, Skyline Drive, and Eldorado for motorized use. The challenge of doing so could be expensive and unsustainable and should be the inholder's responsibility. Allowing motorized vehicles, such as motorcycles, on these routes could be disruptive to other visitors.

MA3000: Park Management/Desired Conditions

Comments regarding the desired conditions took issue with the assumption that Kantishna should be considered a zone for development and with the desire to turn it into a "hub of activity" resulting in expected disruptions from overflight and motorized traffic. Instead, they felt that the desired condition should be a decrease in the evidence of human presence from the east end of the park and a reminder to the visitor that they are progressively farther from home, farther from civilization, and are descending into a true wilderness as they travel west.

Most comments opposed any desired conditions that justified a need for more backcountry infrastructure or changes in group size, more guided recreation than already exists, or more commercial accommodation than was recommended in the 1997 Entrance Area Development Concept Plan.

A few comments supported an expansion of the Wonder Lake Campground, the addition of an overflow campground in Kantishna, or the formalization of trails for rehabilitation purposes or to close social trail networks. These same comments advocated for the removal of some existing infrastructure, closing sensitive areas to protect wildlife, and reducing air traffic as well.

One comment noted that only Concept D had all the components necessary to achieve the Plan's desired conditions for guided activities, camping, and lodging in Kantishna, thus making concepts A, B, and C inadequate. Another comment stated that commercial guiding is not viable unless there is more overnight visitation to increase demand. Therefore, the only way to meet the desired conditions would be to go further than Concept D and include building a 100-150 bed "budget lodge" for the independent traveler.

MP1000: Park Management/Management Plans/General

Comments cited the 1974 Proposed Additions to Mt McKinley National Park Final EIS, 1986 Land Protection Plan, 1990 Cumulative Impacts of Mining Record of Decision, 1990 Kantishna Plan, and 1994 Denali Task Force Report to demonstrate previous intent to purchase lands in Kantishna. The 1994 Denali Task Force Report was also cited for recommending that the Kantishna Airstrip be maintained for light use.

Comments state that while development proposed in Concepts B, C, and D are in part carried over from previous plans, including the 1997 Entrance Area Development Concept Plan and 2006 Backcountry Management Plan, they do not adequately protect wildlife habitat.

The 2006 Backcountry Management Plan was also mentioned regarding limitations on commercial use and education being the first defense against informal trail formation, neither of which were expanded on well-enough in the Kantishna and Wonder Lake Area Plan.

Several comments mentioned that the Plan needs to focus more on the resources and values in the Foundation Document.

Some comments referenced the 2006 Southside Development Plan that was completed to relieve pressure on the north side of the Park.

One comment mentioned the 2012 Vehicle Management Plan standards for managing access, and the 2006 Backcountry Management Plan standards for managing visitor experience, could be violated with the proposed Plan.

One comment suggests that this Plan should build on the Long Range Transportation Plan to make it "what it should have been."

MP2000: Park Management/Management Plans/Support Kantishna Master Planning Effort

Some comments requested a Kantishna Master Planning effort. All comments encouraged the park to expand or shift the planning effort to include land acquisition, creation of conservation easements, 1110(b) access to inholdings, airstrip use, mining reclamation, gravel sources, and the protection of wildlife habitat and wilderness values.

PR1000: Park Management/Park Road/VMP Standards

Comments expressed concern about priorities given for road access, fearing that the public could lose access in favor of private inholdings. Concern was expressed in several comments that additional transportation infrastructure, transportation to Kantishna, and shuttle loops could only contribute further to the park being out of compliance with VMP standards and could degrade the visitor experience. Additional concerns were expressed with the possibility of Commercial Use Authorization (CUA) vehicles on the Park Road further exacerbates violation of VMP standards. Several comments also reference that the Park Road west of the Eielson Visitor Center is not managed to withstand additional traffic. There are already several unaddressed safety issues with existing traffic levels. One comment mentioned that if the standards set do not allow current use levels, then they should be reevaluated.

DE1000: Recreation Infrastructure/Day Use Trails

Comments ranged from supporting all the proposed trail development actions to none of them. Most comments on day use trail development were supportive of actions that could improve a limited number of hiking trails. Many comments focused on which of the proposed trails should and should not be improved, based on perceptions of visitor demand experience and resource concerns. Many commenters supported additional trails around Wonder Lake Campground to serve visitors. Some commenters expressed concerns that some trail development might disproportionately benefit specific lodge operations. The following comment is indicative of many: "One area of development that should receive attention is addressing resource damage along the Kantishna area's many informal trails and improving the safety and visitor experience through trail construction. Priority should be given to improving the most popular nodes of visitor activity. Longer loops through the Kantishna Hills are not necessary or cost-effective."

DE2000: Recreation Infrastructure/Backcountry Trails

Most responders opposed the construction of long backcountry trails. There were a few responders that offered alternative routes for long backcountry trails, along with some responders that generally desired more trails. Some of those opposed to long trails in Kantishna would rather see that development occurs closer to the park entrance, where more visitors could benefit from such a large undertaking. Other reasons provided as opposition to long backcountry trails were that they would not benefit most park visitors, are opposed to trails in eligible wilderness, have the potential for negative wildlife interaction, and the cost of maintenance.

DE3000: Recreation Infrastructure/Roadside Campground

Some comments agreed with the need for low-cost lodging in Kantishna to serve backpackers. Still, most urged the park to consider expanding the existing Wonder Lake Campground over building a new facility in Kantishna. The reasons cited were that Wonder Lake already has the support facilities needed (toilets, cook shelters), there are many hills/knobs to build additional sites without impacting other campers' view. It has an existing maintained hiking trail with views of Denali. Additionally, comments acknowledged that Wonder Lake is a draw for many visitors and, therefore, should be expanded to offer additional recreational opportunities to support that desire. In some cases, the expansion has been long overdue. One comment further mentioned that the Wonder Lake Campground should be made more friendly to those with disabilities, including adding more than one wheelchair-accessible toilet. Another comment suggested that a few campsites within the existing campground be held for backpackers as an alternative to a new campground in Kantishna.

Those comments that said no expansion of the Wonder Lake Campground should occur stated worries about degradation to the visitor experience with too many people in one spot and impacts to the wood frog and waterfowl habitat. Comments requested that more data be collected to understand the campgrounds' actual use versus reservations better, and to understand how many visitors are turned away because of a lack of availability.

Regarding a campground in Kantishna, comments referred to known geohazards that could impact site locations (flashing creeks) and heavy metals in local water sources. Additionally, comments stated that building new infrastructure in an area where NPS already struggles to maintain existing infrastructure seems unwise. Concern was raised about the visitor experience while camping near an airstrip in a buggy area that lacks views such as Kantishna and stated that it would be very important to set expectations for visitors ahead of time and/or use it as a backcountry hiker campground only that a limit of a one-night stay. This campground, if constructed, should be minimal in what it offers as campers should already be prepared to be self-sufficient in the backcountry. Additionally, measures would need to be taken to ensure a campground near the Kantishna airstrip would not contribute further to safety concerns with visitors accessing the active airstrip.

Comments related to group camping generally seemed to agree that this option should only be offered at the Wonder Lake Campground, where facilities already exist, and use/noise can be concentrated, although some doubted its actual need. Another comment agreed with the location at Wonder Lake but requested to separate the group site from the rest of the campers due to group noise. Other comments offered that the sites near the first cook shelter and/or existing day-use area are underutilized and may make a suitable group site. A few comments stated that no commercial use should be allowed at campgrounds as it conflicts with independent access and offers availability to those that spend more money. Some comments suggested a maximum stay be limited to three nights instead of the current seven nights.

Adding bike storage at campgrounds, regardless of location, was both supported and not supported because it could encourage additional use. A few comments said they support the

expansion of the number of campsites to serve existing needs but not to offer additional opportunities. A few comments suggested a minimum stay requirement of 2-3 nights to reduce strain on the buses and Park Road vehicle numbers.

Other comments suggested that neither new campground facilities nor the expansion of existing campground facilities were a good idea and that the park should consider offering these services in other locations along the Park Road instead. There was no support for a "build it, and they will come" approach for campgrounds, and instead, some comments suggested that all development be rejected to stay in line with Charles Sheldon's vision. A few comments suggested that offering additional transportation to/from the Eielson Visitor Center, Wonder Lake, and Kantishna may be an alternative solution to adding additional campground sites anywhere on the west end.

DE4000: Recreation Infrastructure/Backcountry Campsites

Most commenters opposed the construction of backcountry campsites in the Kantishna area. Reasons for opposition were: potential negative wildlife encounters, maintenance costs, greater administrative impact to the area, and the belief that backpackers do not want to be restricted to using designated backcountry campsites in Kantishna. One commenter remarked that "backcountry campsites are usually designed when the carrying capacity is exceeded by use, Denali in the Kantishna area is not there yet." Some commenters were in favor of developed backcountry sites to provide more recreational opportunities.

DE9000: Recreation Infrastructure/Rustic Lodging

The preliminary definition of rustic lodging in the Plan was too vague for many people. The price point and definition of affordable were also concerns. Many comments question the need for rustic lodging facilities. The viability of building and operating the rustic lodging was questioned. The location was also a source of concern. It was also seen as the NPS providing a business opportunity where all other lodging was built on private land.

DE12000: Recreation Infrastructure/Day Use Area

Some commenters supported improvements to Day Use Area facilities at Wonder Lake that address current use levels, but not to the extent that they could attract additional visitors. Others expressed concern that more developed facilities could impact cultural resources or detract from natural experiences. One commenter expressed concern that any visitor-oriented development near the Kantishna Airstrip could be severely impacted by aircraft noise. Another noted that day users don't detract from the campground experience because they are usually present when campers are traveling or out recreating.

DE5000: Admin Infrastructure/Administrative Sites

Comments generally supported updated infrastructure for staff use in a consolidated footprint if it is phased in with visitor services offered. One comment thought the Plan needed to justify better why administrative facilities needed to be consolidated. There was little support for new

NPS office space or maintenance facilities, and commenters suggested that these could be better sited in Toklat. One comment stated that administrative facilities in the west end should not be more complex than those at the Toklat Road Camp. One comment noted that it would be nice to have NPS staff more integrated into the Kantishna community. Comments generally did not support the need for year-round administrative presence. They believed that lodges that operate during the winter should be able to do so independently of NPS support. One comment requested that the School to Work program build any new lodging for staff. Comments are further separated by the site below.

Admin Site 5: Moose Creek

Comments generally did not support the consolidation of administrative facilities at Moose Creek for the following reasons: it would be constructed in an identified natural zone; it would require improved road access for one mile along the Moose Creek Access Route; it could be an eyesore from ridgelines and some private property; the radio viability and reliability in the area is untested in the valley; and, the Moose Creek Access Route is currently used for foot, and bike traffic and wildlife viewing and administrative traffic along the route could disturb these uses.

Admin Site 6: Airstrip

Comments supported administrative use at the airstrip because it is a developed and already noisy location. However, one comment cited 14 CFR 77.19 regarding construction near airstrips and noted that there doesn't appear to be room next to the airstrip for administrative facilities.

Admin Site 7: Wonder Lake Ranger Station

Comments generally supported the consolidation of administrative facilities at the Wonder Lake Ranger Station because it is existing development, it is currently underutilized by law enforcement staff, and it could continue the original use of the Ranger Station. It was noted, though, that new road access to additional development behind the Ranger Station, as well as those new buildings, could be an eyesore.

Admin Site 8: Wonder Lake Campground

Comments generally supported continued administrative use of the Wonder Lake Campground. One comment expressed concern that the Wonder Lake Campground Host not be moved offsite with the consolidation of administrative facilities.

Proposed for Removal: Friday Creek

Comments generally either supported continued administrative use here because it already exists, it is underutilized, and the buildings are in ill repair, or it should be dismantled to restore Friday Creek. Two comments also stated that the concern about aufeis impacting the road to Friday Creek Admin Camp was overstated in the Plan.

Proposed for Removal: Dalle Molleville

Comments either supported use here because development already exists, or they supported removal and rehabilitation of the temporary site as an eyesore. One comment questioned why the Plan both suggested rehabilitation and use as a transportation hub for this site. Another

comment requested that buildings be moved and not destroyed as they were created to fit the period of significance of the area. Another comment suggested that cabins be moved so that they can continue to be used for winter operations, commercially or administratively.

DE6000: Transportation Infrastructure/Bus Depot

The majority of comments were opposed to constructing a bus depot at the two locations identified (Dalle Molleville and North Face parking lot). Many cited a lack of documented need for additional infrastructure. Three comments supported a bus depot either at downtown Kantishna, Wonder Lake Ranger Station, or Dalle Molleville.

DE7000: Transportation Infrastructure/Shuttle System

Comments were mixed from the opposition of a west end shuttle system to considering shuttle service after careful evaluation to support the service. The opposition cited a lack of evidence for need and concerns about adding extra transportation on a narrow road. A failed 1991 "puddle shuttle" was also referenced as an example.

Supportive comments were mixed on including the Eielson Visitor Center in the shuttle loop or not. Other supportive comments provided examples of how the service could be provided under current conditions or with smaller vehicles (i.e., 12 passenger vans).

Both parties expressed concern about how to pay (or not) for the service and the overwhelming benefit it could have to the private lodges.

DE8000: Transportation Infrastructure/Trailheads

Responses regarding trailheads were limited, but the few responders did see value in consolidating and appropriately signing trailhead locations. Some comments about trailheads were: keep them simple with minimal development; trailheads along the roadway make sense, and trailheads could help concentrate traffic and help remove pressure from the landscape.

DE10000: Transportation Infrastructure/Airstrip

Most comments related to the Kantishna Airstrip related to the contested ownership of the airstrip. Responders suggested that until this ownership issue is resolved, there is no reason to base management plans on something where the ownership is in question. Many commenters expressed the need for more airstrip security by fence installation or creating a new end of the road before the airstrip. Some commenters said the airstrip was just too small to be a feasible portal for the type of aircraft needed to move large numbers of visitors.

DE11000: Transportation Infrastructure/End of the Road

Comments that addressed the end of the road transport mentioned safety issues and encouraged turning buses around earlier on the Park Road. Stability of the Park Road in this section, pedestrians, and proximity of the airstrip were brought up as key safety issues. There

was no consensus on where the buses should turn around. Still, there was skepticism about the Gallop Cabin proposal due to trespassing concerns and that the road northwest of Moose Creek Bridge may already be a liability due to the threat of geohazards.

AC1000: Transportation Infrastructure/Access to Kantishna and Wonder Lake

Most of the comments expressed the challenges of adding more bus transportation to access Wonder Lake and Kantishna. Concerns were raised regarding the condition of the Park Road, the remote location, and the 2012 Vehicle Management Plan standards. Two comments did not see air access to Kantishna as viable.

VE1000: Visitor Experience/Cost Prohibitive

Comments discussed the cost-prohibitive nature of reaching the west end of the park and that existing visitor demand for recreation opportunities in Wonder Lake and Kantishna are not sufficient to justify the cost and impacts of new infrastructure. Comments supported providing more affordable access into the park but doubted that the Plan will achieve this.

VE2000: Visitor Experience/Time Prohibitive

The comments were about how time prohibitive it is to reach the west end. Existing visitor demand for recreation opportunities in Wonder Lake and Kantishna areas are not sufficient to justify the cost and impacts of new infrastructure. Day hiking in the far west will remain limited by time constraints; increased infrastructure would not improve this.

VE3000: Visitor Experience/Wilderness

The development of facilities and trails could negatively impact the wilderness experience for visitors (including solitude and silence) and could negatively impact wildlife. NPS management decisions and planning processes should emphasize restraint, minimal intrusion, or commercialization. The development of facilities and trails adversely impacts the wilderness character in both designated and eligible wilderness, and visitor demand for these activities does not justify their impact on the park's wilderness character. Increased traffic and road activity could impact wilderness experience and/or effect 2012 Vehicle Management Plan standards, road capacity, and other road management issues.

VE5000: Visitor Experience/Education

Comments stated that more education is needed for existing day hikers on wildlife safety, Leave No Trace, and risks of wilderness and backcountry travel. Development in this area is inconsistent with the park's overall messaging about a wild experience and the general public's understanding of the park's value as a protected park. The park already lacks the staffing and resources for enough emergency services, visitor resource protection staff, and wildlife tech response; this plan could exacerbate that. Education should focus more on awareness of stream contaminants. The park should already have treated social trail development in

Kantishna as resource damage as a law enforcement issue by documenting incidents, citing known violators, and/or closing trails.

VE6000: Visitor Experience/General Visitor Experience

There is insufficient visitor demand for recreation in Kantishna (or NPS failed to provide evidence of demand) to justify investment, development, and resulting resource impacts. Development in Kantishna and/or Wonder Lake areas is not suitable to protect the distinctive character of these areas and what visitors value about those areas. The Kantishna mining district is not a marketable draw for visitors. Improved access for visitors could be more suitable in other locations (east end, south Denali). Implementation of the Plan could adversely impact the park road, bus system, and/or visitor experience using buses and Park Road. The existing backcountry system is adequate, and backcountry guiding and campsites are not warranted. Bicycle use of the road should be promoted and supported. Wonder Lake-area trail improvements or additions may be warranted, but no other trails. There is support for a more "structured" backcountry experience through trails, guiding, and/or campsites.

CO1000: Commercial Operations

Most of the comments were opposed to developing Wonder Lake and Kantishna for commercial operations. Many comments expressed concern that the Plan's proposed commercial development was strictly for the benefit of commercial operators (existing and future lodges) and not necessarily for the benefit of the independent visitor. Concerns raised included insufficient data/visitor demand to justify commercial development, uncertainty about the Denali Park Road, traffic concerns due to increased vehicles in the Wonder Lake and Kantishna section, and impacts to the soundscape.

Of the comments made about rustic lodging, none were in support (except one comment did state if rustic lodging is considered, it should be at Wonder Lake and they should be used in winter by the public). Comments about a shuttle service between Wonder Lake and Kantishna were mixed with a theme that if shuttle service is considered, it must be done thoughtfully with acknowledgment of the existing physical condition of the road and current traffic levels. A single comment supported commercially guided group camping at the Wonder Lake Campground.

CO2000: Commercial Opportunity/E-bikes

Comments supported the recreational value of bicycling, although challenges were addressed, specifically, the lack of bike rentals in and getting bicycles to/from Wonder Lake and Kantishna. Two comments encouraged e-bike charging stations in Wonder Lake and Kantishna. Two comments encouraged constructing bike-friendly trails.

SU3000: Concepts/B-Meet the Basics

Most of the comments were not in support of development but realized that small improvements might be necessary. Many of the comments suggested a combination of concepts A and B should be incorporated because they believed B by itself is flawed. There is concern about the

logic of developing campgrounds and trails next to the noisy airstrip, and general concern about increased air traffic. The concept of "affordability" and its definition was brought up.

SU4000: Concepts/C-Contributes to the Culture Landscape

These comments were all strongly opposed to the concept because the commenters believe it undermines natural resource protection and visitor experience (of viewing wildlife) in favor of development. The concept is perceived as inducing demand rather than meeting demand, and there was uncertainty about how the NPS plans to "manage the experience" because it wasn't identified.

SU5000: Concepts/D-Optimize Recreation

Many of the comments on Concept D questioned the costs and expressed skepticism about visitor demand. Questions arise here and elsewhere about how NPS would manage the experience not just in Concept D but also in B and C because there is no clear outline in the Plan. There are concerns about manufacturing an experience in Concept D and the calls for development that the commenters felt ultimately undermines the protection of natural resources.

ALT1000: Concepts/Other Alternatives

Several comments suggested other alternatives beyond the concepts provided:

- Pursue a trail system and campgrounds on Denali Borough, Denali State Park, or Ahtna land outside of the park instead of within Kantishna.
- Focus on further developing the Nenana River Trail, Oxbow Trail, Triple Lakes Trail, and other opportunities near the Park Entrance as they could serve more visitors. This could alleviate pressure along the Park Road.
- Reconsider joint efforts with the State of Alaska to provide additional recreational opportunities on the south side of the park. - Expand campgrounds along the Park Road that is more centrally located, such as Teklanika, Savage River, and Riley Creek campgrounds. This could alleviate a need for additional RV parking near the Park Entrance.
- Focus on providing tent-only camping options between Igloo Creek and Wonder Lake campgrounds instead of expanding camping opportunities in Wonder Lake or Kantishna.
- Redefine the west end Park Road experience past the Eielson Visitor Center to terminate all transit and tour busses at Dalle Molleville, with "turnaround services" sited there. Only camper and lodge buses could continue to Kantishna.
- Develop a new "Plan Concept" focused on protecting the natural resources in the area while maintaining the current level of recreation in Kantishna and Wonder Lake.
- Create additional road access opportunities beyond the existing Park Road.

Plan Chapter 3: Implementation

PC1000: Planning Process/NEPA Analysis

Several comments stated confusion as to why the Plan did not include National Environmental Policy Act (NEPA) analysis and inquired when in the planning process NEPA compliance would be completed. Various comments requested that Environmental Assessments or Environmental Impact Statements be completed. One stated that an Extent Necessary Determination would not be enough compliance instead of the NEPA process. Some comments disagreed with the use of categorical exclusions to amend former plans or designate trails in Kantishna.

Several comments also requested an in-depth environmental analysis specific to impacts from development to wetlands, soil quality, permafrost, water quality, and other resources identified in the Plan, especially with climate changes over time. Comments stated that in addition to site locations, trail routes, cultural/wetlands surveys, and current public responses, NPS has a significant data gathering challenge ahead concerning determining need, appropriateness, and sustainability for each additional recreational opportunity in the document.

Several comments called for additional studies and information typically shared in a full plan, such as a Cost Benefit Analysis of the different elements or full concepts presented in the Plan, as well as the cost of mitigations for impacts to cultural resources or wetlands.

Multiple comments expressed concern about how the park plans to fund the new infrastructure considering an existing deferred maintenance backlog. One comment questioned whether the Plan adequately considered operational concerns.

Comments also requested that recreation and its impact on the environment, specifically wilderness and wildlife, be equally considered within the Plan. There was a request to build the planning effort upon the 2018 Long Range Transportation Plan in addition to other referenced documents in the Plan.

A few comments stated that the Park needs a clearer understanding of demand through gathering occupancy numbers and the number of visitors turned away from facilities or services in Kantishna or Wonder Lake. A comparison of visitation increase at the park entrance is not sufficient to show any increase in use in the Kantishna or Wonder Lake areas.

Some comments stated that the Plan appeared to offer foregone conclusions by including concepts for public feedback. Some comments requested further discussion about the Desired Conditions set for Kantishna. A more comprehensive planning process should guide what happens far into the future for the Wonder Lake and Kantishna areas. A few comments also noted that the original planning process was limited in scope to trails and requested that the current plan return to that trajectory and not be a quasi-Development Concept Plan. Addressing resource damage on informal trails is a legitimate need, but the expansion of recreational

opportunities is not. Several of these later additions to the planning effort did not go through the same scoping process with stakeholders that the trails did.

The NPS needs precision Digital Elevation Models (DEMs), on the order of 10X better to accurately lay the trails out consistent with the terrain, topology, and drainage. To acquire that precision DEM, it is recommended that the NPS conduct a LIDAR survey of the plan areas.

Concern was expressed by multiple comments that the park's guidance on how specifically to comment was a move to discourage the public from commenting. The requests made by the park were too prescriptive and did not allow for the expression of opinion on what ideas were support or not supported. It was expressed that all comments be equally evaluated. Comments suggested that a simpler format to engage the public should be used. Furthermore, public meetings on a planning process with so much public interest should have public meetings in other Alaskan communities, and potentially also in the Lower 48.

Concern was expressed that the Superintendent has too much personal stake in the development of the plan and ability to carry it forward as both Superintendent and Regional Director. Concern was raised that a limited number of park leadership was involved in the planning process and requested additional park staff be involved in improving transparency. Comments expressed a lack of trust in this planning process because previous planners have told them that NPS's vision for Kantishna in the past was to purchase private inholdings and restore land for the protection of wildlife habitat. The Plan did not sufficiently explain the change in direction.

There is concern that implementing several of these proposed developments could make Denali more like Lower 48 parks and rob this park of its identity and not do justice to the culture that this park has created. Additionally, there is concern expressed that over-planning and overdeveloping now could lead to overuse and create unanticipated resource damage that would need to be repaired in the future.

Concern was expressed that the Park was pre-decisional in flagging routes before the planning effort and NEPA process being complete¹. No development should take place before the full process, including public comment, is complete.

Stakeholders would like to continue to be part of the conversation and planning process for the Plan. Doyon urges the Park to be mindful of the significance of the Park to Doyon and its members-both in terms of its historical and traditional connection to the area and the importance of the economic development opportunities.

LA1000: Land Related Issues

The public is interested in NPS completing its Land Acquisition Plan. There is concern about building on an airstrip whose ownership has not been adjudicated. One commenter requested

¹ Please do not remove flagging in the field. Instead, report its location and notify park staff.

that Skyline Drive is purchased or an agreement drawn up before incorporating it as a trail in the Plan, or ownership be otherwise adjudicated in court. One comment brought up concern over liability if visitors are hurt on vehicle access roads leading to inholdings. Comments stated that vehicle access routes to inholdings should meet the State rules for a rural road. One comment pointed to earlier planning documents that state the NPS would buy mining claims for preservation, not development. There is a concern that ANILCA rights be acknowledged in the planning document and any eventual development. Another comment suggested that NPS only offers limited recreational opportunity and related development now on the assumption that there could be future land purchases to eliminate the further need for access or recreational opportunities. The blind corner near the North Face Lodge needs to be further addressed if there is an expectation of increased traffic or shared use of the Park Road. Another wilderness eligibility study was requested as some commenters believe much of the Kantishna Hills that weren't originally eligible as wilderness in 1980 now could be. Concern was expressed that NPS had not actively sought out purchasing private lands to discourage further commercial development in the Kantishna Hills. One editorial comment is that the last round of land purchases by NPS occurred in the 1990s.

LA2000: Inholder Access and Operations

The comments were related to the potential impacts of the proposed infrastructure on existing landowners in the Kantishna area. One comment stated that the Brooker Trail could impact the functionality of the Liberty Claims on Eldorado Creek. The Taylor Loop Trail would utilize the existing Skyline Drive, whose ownership is currently being challenged. The trail would need to be rerouted around multiple private property parcels. The Eagle's Nest trail would need to be rerouted around a five-acre inholding with clear signage and barriers at the private property line. Construction of a gravel pit or administrative site in the Moose Creek Valley could impact the viewsheds and soundscape of some inholdings.

Concern was expressed about inholder vehicles and hikers using the same routes for travel and a request that NPS accept liability for any incidents. One comment stated that NPS could not develop the land acquired by NPS through land purchases in the 1990s, as the purpose of these purchases was to restore these lands as habitat for wildlife.

One comment requested that access routes to inholdings be maintained to Alaska State DOT specifications. The State of Alaska recognizes three access routes included in the plan (Skyline, Moose Creek, and Eldorado access routes) as RS2477s, and if they State challenges and wins in court, the State would manage these access routes and not the Park. With this in mind, the State should be consulted on the planning effort.

Pre-ANILCA trails should be the only trails considered for development. ANILCA rights, including access along the Park Road, needs to remain a consideration in this planning effort.

One comment stated that it is disingenuous for the NPS to pursue infrastructure development on federal lands while at the same time working to block development on private inholdings in the area. If the sound and vehicle standards are based on a level of use that does not

incorporate the current use of and access to the inholdings, the commenter recommends updating the standards.

Concern was expressed that taxpayer dollars spent on recreation infrastructure could benefit the private inholdings primarily. Increased recreational infrastructure may increase the value of inholdings and raise the price tag for NPS to buy out properties in the future. One comment stated that NPS appears to support inholder business success.

OC1000: Operational Concern/Existing Deferred Maintenance

Comments stated that the park should address its deferred maintenance backlog before considering new infrastructure. The plan left out maintenance costs for new facilities.

OC2000: Operational Concern/Potential Deferred Maintenance

Comments centered around the idea that additional infrastructure maintenance could be untenable and the failure of the Park Road being a primary concern.

OC3000: Operational Concern/Trail Maintenance

Commenters largely supported the proposal of NPS staff, maintaining a trail network in Kantishna and around Wonder Lake. Many encouraged the NPS to work with inholders that operate lodges in the area to develop agreements and enlist them in trail maintenance activities. Some commenters questioned whether NPS has the capacity to maintain the full extent of proposed trail development, and also noted that climactic changes might increase maintenance needs over time. Some commenters suggested that the extent of the network and maintenance activity be limited to that which is necessary to remedy existing resource damage.

OC4000: Operational Concern/Staffing

The park is inadequately staffed currently, and additional visitation in Kantishna could strain resources. The consequences of not having the staff could be highly problematic.

PR2000: Park Road/Geohazards and Road Maintenance

Comments expressed concern that a planning effort is occurring when the state of the Park Road is uncertain that there is a question as to whether the Park Road can handle even existing traffic in Kantishna, let alone more, and that the park is already above thresholds for traffic allowed on the Park Road. Safety concerns were expressed for any visitors in Kantishna or Wonder Lake that could be stranded after a road failure and for increasing traffic on the Alaska State-owned section, which is the least maintained section and already has existing safety issues between pedestrians and vehicles. Developing the end of the road is a large expense when the state of the Park Road is highly uncertain and would only become more difficult to maintain over time with thawing permafrost. The Kantishna airstrip is not appropriate for "useful-capacity aircraft." New recreational opportunities should highlight other areas of the park and not be dependent on Park Road maintenance.

RC2000: Resource Concern/Floodplain and Wetlands

Concern was expressed that no inventory or condition assessment had been done for the Moose Creek valley, so it is difficult to monitor the impact of development. There was concern that NEPA wasn't completed before a boardwalk being installed along Wonder Lake and that the result could be an impact on riparian zones, wetlands, sensitive vegetation species, and nesting areas for waterfowl. One comment requested a more detailed analysis of the impact of development on wetlands and the mitigations to lessen that impact. A few comments requested an analysis of the impact on water and air quality from the proposed development, and some specifically called out the impact on the water quality of Wonder Lake. There were a few comments that expressed concern about building bridges, trails, and other infrastructure within the Moose Creek floodplain, or encouraging any activity that increased use within the floodplain.

RC3000: Resource Concern/Wildlife

Several comments expressed concern that backcountry trails and designated campsites could increase negative wildlife interactions and contribute to wildlife habituation. Other comments noted a sharp decrease in wildlife sightings over the years and worried that increased use in the area could contribute to a further decline in sightings. A few comments said wildlife education needs to be part of the Plan, and one specifically noted communication challenges with non-English speakers. Concern was expressed that bike/wheelchair friendly trails could disrupt wildlife movement in the area. One comment wondered what monitoring of wildlife movements and health is done currently and if that would continue with any new development. One comment noted problem black bears in the Kantishna area and worried about an unstaffed campground or rustic lodging site being an attractant for them. Several comments also brought up the purpose of the northern park additions in protecting wildlife habitat and argued that new infrastructure and increase use could degrade it. Some comments acknowledged that the possible benefits of properly routed trails are that they concentrate on use and reduce resource damage from the creation of informal trails.

RC4000: Resource Concern/Tribal

One comment stated that NPS needs to share better the spiritual value of the land in telling the history and cultural value of the native peoples that were on the lands before federal ownership.

Comments continued that NPS needs to consult with native peoples before moving forward with any development. Doyon, in particular, has a substantial stake in this planning effort as a landowner of several inholdings, as an operator of the Kantishna Roadhouse property, and as joint owner of the park's Type 1 Transportation Contract awarded to Doyon/ARAMARK.

RC5000: Resource Concern/Sound Standards

Several comments were concerned that new infrastructure in Kantishna could put additional strain on both the Park Road and the Kantishna Airstrip and that both access points have already surpassed thresholds put in place via earlier planning documents. Adding any amount of traffic could further impede the park from achieving the natural sound disturbance thresholds.

One comment offered that the park needs a better fly over monitoring program before encouraging more aviation use to Kantishna. Comments state that encouraging aviation access to Kantishna could degrade the soundscape and impact many wilderness experiences along the entire Park Road corridor. One comment requested that the Plan discuss how it is going to protect the soundscape to the Backcountry Management Plan Standards with the proposed development and that each concept is analyzed to determine what its impact on the soundscape could be.

RC7000: Resource Concern/Cultural and Historic Resources

Several comments stated that the mining history of Kantishna should not be highlighted. It is inconsistent with the purpose of the new park editions, the park has spent time and money restoring the land to its natural condition, there are locations better suited in Alaska to share its mining history, and visitors seeking a mining town could be disappointed to find there is nothing left. Drawing visitors to the sites that do exist could be a safety concern for them but also puts those remaining cultural resources at risk of damage or looting. Some comments suggested there isn't enough information available to justify the reconstruction of the proposed Summer Trail on the east side of Wonder Lake, as mentioned by Sheldon. A few comments also mentioned that there were native peoples that used the land long before miners and that the Park needs to ensure that they're consulted in the planning process for any development.

RC8000: Resource Concern/Subsistence

There were multiple requests that NPS more thoroughly analyze the impact of the Plan's proposals to subsistence through an ANILCA Section 810 analysis. Other comments sought clarification on what constitutes a subsistence trail, why they are needed if subsistence hunters are not required to stay on the trail, and whether motorized access would be allowed. There was also a question as to whether this is a large enough issue to warrant any safety-related discussion as there are so few hunters.

RC9000: Resource Concern/Viewsheds

Comments were concerned that additional trails and access to Wonder Lake could take away from its wildness and pristine views.

RC10000: Resource Concern/Wilderness

One comment expressed concern that the NPS recent clarification of the ineligible wilderness boundary was not merited and found the timing "conspicuously opportune" to the planning effort.

Comments requested the use of the Minimum Requirements Analysis tool and an Extent Necessary Determination for proposed actions and commercial use of infrastructure within, adjacent to, or impacting wilderness.

A few comments wondered how the proposed actions contributed to the conservation and preservation of park resources, as the 2006 Backcountry Management Plan states any new concession opportunities must.

A few comments suggested that Wilderness Recreation and Wilderness Values play a stronger role in the planning effort, noting that they were mentioned but were not a value primarily considered. One comment stated that the Washburn Trail, a proposed formal trail in designated Wilderness, offered no new experiences to the campground or off-trail hiking, and therefore, should be rehabilitated instead of constructed.

One comment paraphrased Adolf Murie and his call for minimal intrusion in the park on all accounts and whether the park could “survive as a symbol of civilizations higher aspirations or be sacrificed to the lowest common denominator.” One comment offered that resources cannot be improved by infrastructure, only degraded.

In contrast, two comments acknowledged that the Kantishna area has a history of development and that the Wonder Lake was deliberately removed from designated Wilderness in 1980, so neither is in designated nor eligible wilderness and therefore should not be managed for wilderness experiences.

RC11000: Resource Concern/Climate Change

Comments acknowledged the change in climate impacting existing infrastructure, namely the Denali Park Road, which provides primary access to Kantishna and Wonder Lake. Beyond permafrost melt and soil erosion, changes in climate are also increasing the amount of brush in the Kantishna area, making trail maintenance more of a challenge over time. One comment noted that changes in climate make rivers less safe to use as corridors in winter and shoulder seasons, so trails, such as the proposed Ditchline Trail, should be made dog-sled friendly. One comment expressed concern about the increased probability of wildfire in Interior Alaska and how that could impact the Park's perspective on multi-day trails. One comment requested that the park consider its carbon footprint in planning development on the west end.

RC12000: Resource Concern/Informal Trailing

One comment expressed concern that new informal trails could stem from any formal trails created and contribute to a larger informal trails network. Planning efforts should focus on repairing damage from existing informal trails in both Kantishna and Wonder Lake. One comment wondered how NPS could manage up to 80 miles of trail if it struggles to manage two miles of informal trail near the north end of Wonder Lake that currently exist. Another comment expressed disappointment in park management for allowing guided use on informal trails, knowing that repeated use contributes to further resource degradation. Rather than developing formal trails, this comment requested a further explanation of why commercial entities are allowed to use the same trail repeatedly and not use similar practices to the NPS-led Discovery Hikes. One comment stated that the park should not wait until informal trails form as they don't consider sustainable trail alignment or impacts to the resource.

SA1000: Safety/Park Road

Several comments relayed personal experience, a history of user conflict between vehicles and pedestrians, or bicycles on the narrow sections of the Park Road in Kantishna as well as the Wonder Lake Campground Access Road. Two comments acknowledged trails connecting Wonder Lake and Kantishna as ways to reduce this safety concern. Another comment said no trails were needed as walking along with the Wonder Lake Campground Road and Park Road is a good visitor experience. Another comment suggested that the Park needs to reduce blind corners and the deteriorating condition of the Park Road in Wonder Lake and Kantishna to improve safety.

SA2000: Safety/Trails

Comments proposed that trails could provide a false sense of security in the backcountry as they allow visitors to stop paying attention to their surroundings. One comment also acknowledged that trails could provide a path out of the backcountry without navigation and provide surer footing while hiking.

SA3000: Safety/Water Quality and Access

Concern was expressed in several comments that camping, day-hiking, and overnight backpacking was being offered in an area where water sources are more often than not contaminated with heavy metals. Also, water sources at high elevations are seasonal and unreliable. Additionally, the Moose Creek has a history of flooding, and Friday Creek and Eureka Creek drainages have a history of flashing, putting infrastructure and people at risk.

SU6000: Class 2 Trails in Kantishna and Wonder Lake (feedback on proposed NEPA Action)

There were 18 comments related to classifying some informal trails as Class 2 trails in Kantishna so that minimal maintenance could be performed on them. Some support class 2 trails if they are pre-existing trails in Kantishna. Some comments support formalizing existing trails to prevent further degradation or prevention of additional social trails. Other commenters expressed concerns about formalizing informal trails without a full NEPA process. Concerns were raised that trails leaving private property are both maintained by NPS and not accessible or usable by the general public. In addition to the NEPA process concerns, there is little support and some objection to new trails being classified unless they are existing informal trails in Kantishna. One commenter objected to any new trails, except Class 1 trails linking the Wonder Lake campground to the existing McKinley Bar Trail.

Editorial

There were 44 comments offering edits that will be incorporated as appropriate in future planning or compliance documents.