



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7th Avenue, Suite 1430
Anchorage, AK 99501-3561
Main: 907.269-8690
Fax: 907-269-5673

March 30, 2023

Brooke Merrell, Superintendent
Denali National Park
ATTN: Planning
PO Box 9
Denali Park, AK 99755

Submitted via email to dena_planning@nps.gov and via the Planning, Environment and Public Comment (PEPC) website

Dear Superintendent Merrell:

The State of Alaska reviewed the Denali National Park and Preserve (Park) Environmental Assessment (EA) for the Nenana River Trails. This proposal considers developing approximately 17 miles of trail near the Nenana River, in the frontcountry between the George Parks Highway (Parks Highway) and the Nenana River. The trails include both multiuse trail options and universally accessible trail components. This letter constitutes the State's consolidated comments for your consideration.

The State of Alaska (State) has commented on Denali trails plans in the past and continues to support proposals to construct trails and other improvements in the park's frontcountry. These improvements will increase access to public lands through development of trails and campgrounds. Specifically, the State also supports prioritizing the construction of universally accessible trails and encourages the Park to develop a sustainable winter trail grooming program. The State appreciates the Park's consideration of future projects in the Nenana River corridor, including the existing right-of-way issued to the Alaska Gasline Development Corporation.

We encourage the Park to discuss necessary permits and compliance with State agencies. Regarding the proposed pedestrian bridge over the Nenana River, the Department of Natural Resources (DNR) notes that the State claims this portion of the Nenana River as navigable for title purposes. DNR has management authority for state lands (including the land, water, tidelands, and shorelands of navigable waters). This authority includes management of navigable waters, tidelands, and shorelands within and adjacent to the boundaries of federal lands. Any activity below ordinary high water, including bridge construction, requires authorization from DNR's Division of Mining, Land, and Water (DMLW). DNR looks forward to working with the Park on this infrastructure improvement project.

Other necessary permits from the State include the Department of Transportation and Public Facilities (DOT&PF) permits acknowledged on page 10 of the EA, and potentially also fish habitat permits from the Department of Fish and Game (ADF&G) for any work below ordinary high water.

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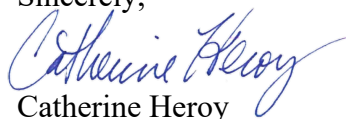
Please contact Audra Brase in the ADF&G Habitat Division office in Fairbanks at (907) 459-7282 or via email at audra.braser@alaska.gov for any questions regarding any potential fish habitat permits.

The DOT&PF notes that the Park has been pro-actively communicating about the potential impacts of a trail crossing at the Parks Highway, which could cause issues for public safety if not managed properly. For example, early plans to route the trail crossing under a bridge would avoid conflicts with motor vehicles using the highway. The early communication with the DOT&PF Northern Region and Bridge Design groups has been much appreciated, and the State encourages the Park to continue this helpful outreach.

Closing

In summary, the State appreciates the efforts to increase visitor access and enhance user experiences in Denali National Park and Preserve. Please contact me at 907-269-0880 or catherine.heroy@alaska.gov if you have any questions or to discuss any of these issues.

Sincerely,



Catherine Heroy

Acting State ANILCA Program Coordinator

Ecc: Jennifer Johnston, Outdoor Recreational Planner, Denali National Park & Preserve