

January 22, 2010

Dear Superintendent Anderson and the Planning Team,

Thank you for the opportunity to comment on the EA for construction of a new access road to the Kennels at Denali National Park and Preserve. The board and members of the Denali Citizens Council are always interested in providing input to the National Park Service on proposed projects, with an eye to maintaining the intent of prior policy and complying with the mandates of the NPS Organic Act.

In all cases, the scale and scope of infrastructure projects must be carefully considered. Without fervent concern regarding scale and scope, project planners can select draconian approaches instead of accepting easier-to-achieve, less expensive and more environmentally friendly alternatives. In general, it is our belief that the most minimal approach that gets the job accomplished is the right way to build infrastructure. As such, we support elements of Alternative 2 of this EA, the restructuring of the existing road, with some modifications listed below. Such is basically the approach of the Headquarters Master Plan EA (2007) and the approach preferred and supported by experts in the field in the *Cultural Landscapes Report* (2007).

Our reasons for preferring Alternative 2 (with some changes) over the Preferred Alternative 3, along with some simply general comments are listed below:

1. This EA errs in describing the No Action Alternative as the existing condition. There is actually a mandated infrastructure project for the kennels road that was decided in the Headquarters Master Plan in 2007. The FONSI from that plan provides the baseline for this EA, even though its stipulations have yet to be built. The accepted plan already included a larger parking area for buses, some changes to the existing west end access road, a parking lot west of the flagpole, many of the elements of Alternative 2 above.
2. This EA fails to give adequate "Purpose and Need" for overturning decisions made in the Headquarters Master Plan (the Preferred Alternative of which closely resembles Alternative 2 in this plan). In addition, the original HQ plan, in Section 2.5, eliminated an alternative road for bus access in part because of wetlands impacts.
3. The only reason given for this change is listed on page 1 by the sentence, "Additional internal scoping regarding the realignment of the kennel access road and needs for associated parking prior to construction resulted in a new proposed action..." (EA, p. 1) No analysis other than "internal scoping" is offered to explicate this big change in a prior plan. Such a situation disrespects the intelligence of the commenting public, who wish for more information to assist in making an informed decision about the Preferred Alternative. Where are the data on parking needs? What type of parking? Is there a problem with enough parking for tourists, or is it in fact a problem for employee parking?

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4. The project described in Alternative 3 is too big and causes the greatest new impacts of all the available alternatives, an unacceptable situation, especially given the unproved assertion of need.
  - a. The expanded footprint for bus parking and the new road and visitor parking in Alternative 3 would have a tremendous impact on the experience within the Historic District itself, surrounding one side with pavement.
  - b. We agree that steps should be taken to lessen traffic in the Historic District, but this can be accomplished through reclamation of private parking spaces there, making the 6 or fewer tour bus trips per day feel and be less impactful.
  
5. An alternative DCC could support would contain elements of Alternative 2 and also the following:
  - a. It would eliminate or severely reduce parking and all traffic but Kennels tour buses from the Historic District, as envisioned in the HQ EA.
  - b. It would use the existing access road, with some improvements to parking, resulting in less loss of native vegetation and wetlands.
  - c. It would minimize viewshed and noise disturbance along the Historic District boundary.
  - d. It would provide an improved bus parking and landing situation without the more major impacts of alternative 3.

Thank you for the opportunity to comment.

Sincerely,



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