

November 30, 2005

TO: Janet Brown, PE
Engineering Manager, Department of Transportation and Public Facilities
2301 Peger Road
Fairbanks, Alaska 99709

RE: North Denali Access Reconnaissance Study

Dear Ms. Brown,

I am submitting these comments on behalf of the Board and staff of Denali Citizens Council. Ours is a grassroots citizen group of 350 members dedicated to maintaining the core values of Denali National Park and Preserve and planning for environmentally sustainable growth and development on adjacent lands. We understand the importance of Denali National Park and Preserve to the local community, economically, socially and environmentally.

We appreciate the opportunities provided by the North Denali Access Reconnaissance Study team for public input into the study process. We are hoping to participate in the agency meeting in Anchorage currently scheduled for December 13th, 2005. These comments are meant to reiterate and supplement our comments made in April 2005 during the scoping phase of this study. First, we will address the Draft Purpose and Need Statement dated April 2005. Then, we will make some general comments on the study.

Purpose and Need Statement

1. A Purpose and Need statement should simply state the Purpose and Need **for the study**, not for the project. We are assuming that the Purpose and Need document is referring to the **study only**. However, the Working Draft as of April 2005 spends three pages describing why we actually need this project. This type of project justification does not belong in the Purpose and Need Statement for the Study, but instead as a portion of the Study itself.
2. A more acceptable **Purpose of Project** statement appeared in the *Phase I Report* performed by the Denali Borough in consultation with DOT and PF and published in April 2003. It is as follows:

“The North Denali Access Route Planning/Reconnaissance Study seeks answers to several long-term questions surrounding the concept of providing new access to the north side of Denali Park and Preserve. The most important question is, “Should a new north side transportation system be developed between the Parks Highway/Alaska Railroad corridor and some location most advantageous for visitors to, managers of, and neighbors of Denali National Park and Preserve?”

DCC Board and Staff

Nancy Bale
Jean Balay
Eric Oberg

Jenna Hamm
Joan Frankevich
Grady Wilson

Becky Warren
Community Organizer

If the evaluations show that new access is not beneficial, this project will recommend no further work... As part of the review of past work on this project and the preliminary scoping of issues for consideration, we have characterized how to best make the determinations of what is beneficial to the Borough, State and National Park. Some actions that would seem beneficial to one of those interests could be detrimental to other interests.”

The above excerpt maintains a flavor of impartiality, describing the various alternative conclusions that are possible under this project, and capturing the concept that what appears to be “beneficial” to some might not be so to others. We urge you to rework the Purpose Statement in this document to be more in line with the quotation above.

3. The **Need for Project** statement for this Study need only provide evidence that this subject is important and controversial and that there are various existing scenarios along with newer concepts and ideas for North Access, and that it is appropriate to gather together existing data and conduct new scoping and analysis in order to determine whether such a project makes economic, social and environmental sense. Instead, the Need statement makes a number of favorable statements regarding a northern route into Denali.

We urge you to reconstruct the Purpose and Need Statement such that the Study is described as an open, impartial review of all the issues, with a commitment to analyze both costs and benefits of North Access.

General considerations regarding Northern Access into Denali National Park

We understand that the study has been limited to consideration of only those northern access routes that terminate in Kantishna. Was this limitation inherent in the legislative earmark itself? Confining this study to this destination affects its impartiality and scope. Below are several important considerations that should be included in the Study.

1. **Consider real costs v. benefits to the local community** – Often, new infrastructure projects are touted as of benefit to the local community. However, consequences of additional seasonal tourism on a large scale in Healy could be devastating to local quality of life, especially in the current atmosphere of no zoning and minimal land planning. The Borough takes the brunt of problems associated with massive tourism projects laid down in a minimum regulation atmosphere. What quality of jobs will actually be offered? How many of the employees will not even be local residents?
2. **Consider conflicts with the purpose of Denali National Park and Preserve - The National Park Service** has not in the past and does not now advocate a northern tourism route into Denali National Park and Preserve. The park’s General Management Plan of 1986 would need to be amended in order to favor northern access. On page 32 this plan states,

The National Park Service continues to disagree with the state of Alaska about the economic justification for building another northern access road...A northern access route through the park would have severe environmental impacts. The Senate report to accompany HR 39 (ANILCA) says that ‘the prime resource for which the north addition is established is the critical range necessary to support populations of moose, wolf, and caribou as part of an integral ecosystem.’... the

lands are suitable for wilderness designation. The benefits to visitors of having expanded services in the northern portion of the park would not justify the ecological damage.

Since ANILCA recognized the outstanding habitat of Denali's northern additions, there is a statutory basis for preferring minimal or no development on the north side of the park. The most recent Backcountry Management Plan for Denali, Preferred Alternative, stresses the value of these areas for wilderness-style recreation.

- 3. Kantishna is not an appropriate terminus or destination for north access. It should be retained as a wilderness destination** - North access into Kantishna would diminish the area's wilderness feel and promote crowding, noise and the more negative aspects of tourism. Simply because one CAN place more visitors into an area does not mean that it is desirable or serves the purpose of Denali National Park and Preserve. All conceivable routes will be unacceptable if Kantishna is the terminus.
- 4. Consider the international importance of the northern Denali ecosystem** - To our members, there is no benefit to new access into the Kantishna, particularly along the northern side of the park. The benefit lies in retaining the intact ecosystem of the lands in the Wolf (Stampede) Townships and the Toklat Basin. The area is a preferred wintering area for Denali's Caribou herd. Wolves from a large part of the park travel here in the winter to follow this prey. The Toklat River has some salmon spawning grounds in the area, even up into the core Wilderness park. Bear dens and moose habitat are known features of the northern additions and state lands north of Denali Park. In addition, Denali's northern lands (including the Stampede Townships) are important for a variety of upland birds and the area is a migration corridor. Although a road or railroad per se would not automatically render extinct these populations, it would lead to the inevitable human uses that promote habitat fragmentation and species decline.
- 5. Added to the significant environmental costs of northern access would be the high financial cost of building a seasonal road or railroad to Kantishna** – Costs were high according to the North Access Feasibility Study of 1996-7. They would be higher now. The benefits of this project are questionable, and we feel do not justify the costs.

Our comments on the Routes

In general, we wonder how impartial this study can be in selecting a preferred route or in deciding whether to proceed or not when the Governor of Alaska is pushing the Stampede Route preferentially with his Transportation Initiative and the Anchorage Daily News is publishing articles entitled, *New road for Denali going north* (November 22, 2005). Nevertheless, we will provide a few comments on each major route alternative below:

- 1. The Stampede Route** – This route goes through the Wolf Townships to the eastern boundary of the park, is the most controversial route, and also the one that Governor Murkowski appears to favor for northern access. Several factors make this route undesirable:
 - The great majority of soils along this route are Alpine Basin soils, the region's wettest and most permafrost laden soils. It is well known that this route, though called a road, was used for wheeled transport just once.

- The Tanana Basin Area Plan, the primary state planning document for lands in the study area, advocated that the entire Wolf Townships be designated wildlife habitat. For private ownership and development to take place, this classification would have to become secondary, an important policy change considering the value that these lands have for wintering caribou and migrating birds.
- The initial miles of this route move through a state subdivision and its use for tourism would create conflicts with local landowners and users.

2. The Route from just north of Ferry that goes along the northern boundary-

- The initial miles of this road would again create conflicts with local, year round uses.
- Crossing the Toklat just north of the park would come near or actually touch areas of the Toklat where bears fish for spawning salmon. Habitat fragmentation and other conflicts associated with a road in this location are too high a cost to pay.

3. The Rex Route –

- This route also presents some conflicts with local and regional uses and opens the area to a wide range of user conflicts.
- This route would be the **longest and most costly**, and not easily defended as a true northern access route into Denali National Park.
- Habitat fragmentation remains an important impact of this road also.

A Better Future does not mean that all demand must be met all the time

NPS has committed to enhanced services at the park entrance and on the south side of the park in order to absorb additional demand over the next few years. Beyond that, Denali National Park and its gateway communities are not obliged to continue giving access to large scale tourism infrastructure projects. It is the existence of wild lands that makes Denali National Park valuable to tourism. Keeping the ecosystem large and intact will better support its wildlife, will make the existing tourism uses more valuable, and will result in visitors who are more satisfied with their experience. We are not supportive of new north access into Denali National Park and Preserve.

A better future for the Denali Borough would involve slower growth and a diverse economy, including:

- a. comprehensive planning and economic diversification with a slow growth model
- b. some reasonable resource development,
- c. the encouragement of a mix of small, independent tourism businesses supported by locals
- d. retention of rural lifestyles and wild lands close to town.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nancy Bale". The script is fluid and cursive, with the first letters of "Nancy" and "Bale" being capitalized and prominent.

Nancy Bale, President Denali Citizens Council
907-277-3825
nancy@denalicitizens.org

Please Include in Bibliography:

Bill Brown, *Denali Symbol of the Alaska Wild*, a history of Denali that includes a section on the Stampede Road.

North Access Feasibility Study of 1997, a cooperative NPS-DOT effort

Denali Borough North Denali Access Route Planning/Reconnaissance Study Phase 1 Report
(April 1, 2003)

Prepared by the Denali Borough in cooperation with the State of Alaska Department of Transportation & Public Facilities and the Federal Highway Administration