

November 15, 2005

Dear South Denali Planning Group,

On behalf of the Board and members of Denali Citizens Council (DCC), thank you for the opportunities we've had to provide input on the South Denali Implementation Plan. DCC, founded in Cantwell in 1974, has about 350 members, many of whom live or have lived in the gateway communities of Denali National Park. We work to raise awareness about issues affecting our livelihoods, lifestyles and the well being of Denali National Park and Preserve. We recognize the importance of both Denali National and State Parks to their local communities economically, socially and environmentally. We support careful development on lands near these Parks, realizing that these lands, although available for a greater number of uses, are universally known and valued as critical wildlife habitat and for wilderness recreation.

Our members and directors have been involved in the various south Denali planning efforts from the 1980s up to the present. Our President Henry Friedman served on the Denali Task Force, which concluded that it would be important to provide a variety of visitor services in any South Denali plan. Over the years, the precise siting of these facilities has remained controversial. We commend the planning team for continuing to meet with members of the public to develop a final implementation plan that most reflected their concerns and desires.

As such, we guardedly support the Preferred Alternative C, the Parks Highway Corridor alternative. Building a visitor center near the parks highway will provide a practical, efficient mode of access to wonderful views and outstanding hiking opportunities. We support some of the Actions Common to All Action Alternatives as well, but would like to qualify our support with several comments. These comments will address both the Denali State Park Master Plan Amendment and the Draft South Denali Implementation Plan.

General Considerations

- This is a huge plan, covering a number of different actions, the implementation of which will take many years. There will be an additive effect as each element is constructed - the Visitor

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Center, the trails to and from the Visitor Center, the VC parking area and shuttle system, the parking lots along the highway, the expanded facilities and road upgrades along the Petersville Road. The number of visitors to be served has been estimated at 250,000 per summer.

- The cost of this project is quite large, and although funds for capital expenditures may be readily available because of the US Congress' commitment, the ongoing availability of public funds for yearly maintenance costs is highly questionable. The funding approach to be used in allocating both public and private money for support services is important and hardly covered in this document. Concession and other business contracting are not discussed. Although fees will be an important part of the overall funding structure, these are public facilities and fees should not be burdensome. We are concerned that budget cuts to operations have already reduced staffing at both Denali State Park and Denali National Park. How will this plan buck the tide of reduced public funding over the next few decades.
- The South Denali implementation plan and the DSP Master Plan amendment identify several regulatory and monitoring processes that this plan will or could trigger, for example
 - Scenic Highway Designation for the Parks Highway Corridor between MP 105-132,
 - regulation of land uses adjacent to the Parks corridor,
 - DNR zoning on private lands within Denali State Park,
 - ecologic monitoring and wildlife studies in the State Park,
 - establishment of a Denali State Park Game Management subunit, and DSP SLUD revision.
 - establishment of extensive monitoring to ensure that environmental and social impacts are avoided.

However, very little specific information is provided on how these and other regulatory activities will fit into the overall implementation process. It is vital, and stated in the plan, that research and public involvement occur. We have less confidence, however, that monitoring and regulation can keep up with implementation under the plan as written. In general, all of the above regulatory activities should occur prior to ground breaking activities. Monitoring and enforcement activities should be specific and feasible before infrastructure is developed.

- The Parks Highway is a two lane road over most if not all of the planning area. It handles most of the north-south traffic in this state. It is VITAL that the highway infrastructure be safe and adequate to deal with the increases specified in this plan. Avoiding a proliferation of driveways,

providing adequate turning and passing lanes, and maintaining scenic qualities, these are not simply aesthetic considerations, they are important from a safety standpoint. In addition, enforcement of traffic laws summer and winter will require increased staffing. Corridor improvements are a priority.

- Maintaining a balance between general public access and access by the package tour industry to the Visitor Center will be important. The plan should provide guidelines for maintaining this balance.

Specific Concerns Regarding DSP Master Plan Amendment

- **Wildlife Research and Monitoring**

On page 22 of the DSP Master Plan Amendment states, “Very little natural resource or recreational research has been conducted within Denali State Park. Large-scale resource inventories have been carried out in the area, but frequently have excluded Denali State Park. Detailed information on park resources and recreation/tourism patterns will be very helpful for *future planning and management activities*.” Research is important for the *current* planning and management activities and should be performed prior to development of extensive infrastructure. Bear habitat disruption without real knowledge of bear numbers and range is a special concern. Perform wildlife research during the first three years, along with improvements on the Parks Highway (adequate turning lanes at existing key areas such as Petersville Road and Princess Hotel turnoffs) establishment of Highway Corridor protections (such as setbacks, green buffers, and limits on driveway access) and action on key inholdings. When these steps are complete, break ground on the Visitor Center and parking areas.

- **Land Use Designations**

These designations are at the core of this plan. They are well thought out and stated, and our comments refer to the state’s assumptions of what activities are appropriate to each designation.

Wilderness – Airboats and snowmachines are incompatible with the Wilderness land use designation. That said, we recognize that these very uses are currently established and legal in several areas of Denali State Park. That fact makes it highly important to develop a monitoring system and to enforce safety and best practices.

There should be no developed campsites in Wilderness areas, except to avoid or mitigate impacts.

Sound monitoring – Division of State Parks and the National Park Service should coordinate on sound monitoring activities and in developing soundscape standards for the State Park, beginning with the Wilderness Areas west of the Parks Highway and contiguous with the Park boundary. Standards may vary between the different land use designations, but should be made with the intention of preserving natural soundscapes that correspond to the intended purpose of each designation and retain the feeling of being close to nature.

Natural areas – These areas will be subject to heavy use if near the Highway or a Recreation Development node. All trails and infrastructure that is to be established in these areas must be located based on real knowledge of animal populations. Avoidance of unfortunate bear encounters can only occur with prior research. Avoid streamside trails whenever possible. Mandate safe, bear-aware camping and hiking.

ATVs – Although ATVs are not authorized off roads and parking areas, their use is a growing problem (especially in the planning area south of the State Park) and requires, again, adequate funds for monitoring and enforcement.

Curry Ridge – Because of the location of the proposed Visitor Center in Alternative C, and the proposed rehabilitation of the Curry Hotel, recreational activities will increase on Curry Ridge. The plan should provide clear guidelines and be proactive in designating separate trails for snowmachines and skiers. There must be adequate monitoring to ensure that snowmachines remain on a marked trail, and to determine that there is continually adequate snow cover for this activity. The plan should prohibit helicopter-supported sight seeing landings or helicopter supported hiking or skiing on Curry Ridge (no discretion by the Director on this one.)

Rivers – The use of airboats and other motorized forms of transport on the Chulitna and Susitna Rivers could experience significant increases with this plan. At the same time, non motorized uses will continue to be popular. A public process, using consulting services such as RTCA, should be held in the first three implementation years in order to avoid problems with safety, crowding and diminishment of visitor experience.

Budget – Denali State Park has experienced significant budgetary problems over the past few years. Staffing is reduced and maintenance activities curtailed. The brand new Denali View pullout is already gated for the winter, when it could be an enjoyable stop year round. It is imperative, when such large increases in use are contemplated, that there is enough money to maintain the infrastructure and to provide monitoring and enforcement.

Specific Concerns Regarding South Denali Implementation

Funding– As stated above, development of this much infrastructure is irresponsible without first ensuring that its construction, maintenance and staffing (\$551,000 annually under Alt C) can be funded.

Protect Parks Highway corridor in the planning area – Construction of infrastructure should be contingent upon development of regulations to prevent sprawl. The Mat-Su Borough should freeze all land sales adjacent to the corridor until buffers, setbacks and other limits are in place.

Parking lots – Mile 121.5 – The parking facilities intended for mile 121.5 will more than double the existing capacity at this site. Before over 100 vehicles and perhaps as many as 400-600 people enter this small area, the Parks Highway Corridor must be protected from local sprawl. In addition the local citizens should be permitted to identify and protect their trails. Parking areas of this size carry inherent safety and crowding issues. The Final Plan should reduce the capacity of these lots and should mandate an EA or similar compliance process before these enlargements are built, to consider the cumulative impacts of introduction of this much motorized winter (and summer) recreation into an area where there are a number of rural residents who value their quiet and who use trails for their own traditional activities..

Petersville Road – Under Alternative C, two nodes of camping and parking development would be constructed, near Kroto Creek and near the Forks Roadhouse. Our major concern regarding these areas is their encouragement of relatively unregulated motorized backcountry use, both winter and summer. This is not within the State Park and there are already a number of ATV ruts, visible from the air, along Petersville Road. Trails must be marked and their use enforced. Before this access is facilitated, the plan must mandate an affordable enforcement and monitoring strategy.

Motorized – non-motorized conflicts – The Final plan should recognize that there will be conflicts between motorized and non-motorized users on most of the trails that will be constructed outside Denali State Park. This conflict will occur both in summer and winter. The plan must mandate the formation of a Citizen-Agency Committee to mediate these conflicts, establish guidelines and develop enforcement plans. Most of the trails radiating from the parking lots outside Denali State Park are likely to become the domain of motorized users.

Further NEPA compliance – On page 245 of the DEIS, a chart depicts those components of the Visitor Center development that will be subject to additional compliance through EA. In view of the still vague architectural structure of the Visitor Center itself, the Final EIS should stipulate that its construction be submitted to further compliance through an EA. In this way, cumulative impacts incompletely considered in the Final EIS can be more thoroughly examined in a public forum.

Denali Citizens Council has participated as a public advocate in a number of large environmental processes at the entrance to Denali National Park and Preserve, including the Backcountry and Frontcountry Plans. These great visionary plans occur incrementally, in stages. Because it is a plan of this type, the Final South Denali Implementation Plan should have flexibility and include opportunities for us to recheck and even reset our course if social and environmental impacts are seen to be too great.

Not only will the developments mandated by this plan influence the quality of life for Alaskans and visitors, but other developments in the private sector will occur in parallel, developments that will not require this kind of compliance or regulation. The law of unintended consequences could produce much of the unwanted scope of development that has already occurred at the entrance to Denali National Park and Preserve. We hope the Final South Denali Implementation Plan will be proactive in attempting to avoid these pitfalls.

Sincerely,



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