

March 3, 2008

Susan Lee, Mat-Su Borough Planning Division
350 East Dahlia Avenue
Palmer, Alaska 99645

Dear Ms. Lee,

On behalf of the board and more than 300 members of the Denali Citizens Council, thank you for the opportunity to submit comments on the request by Mr. Van Doren for a Conditional Land Use Permit at Mile 135.5, Parks Highway. The members of the Denali Citizens Council have a profound and ongoing interest in this request by virtue of their historic involvement in cooperative planning for tourism activities at South Denali. We have members who live in Talkeetna and other parts of South Denali and who have a direct interest in appropriate development there. In addition, DCC has a history of involvement with the National Park Service and with the State of Alaska in a number of public processes, including the Denali National Park Backcountry Management Plan, the South Denali Development Concept Plan, the recently established Aircraft Overflights Advisory Council, the Denali Task Force and several ongoing activities at the northern entrance to Denali National Park and Preserve.

It should be kept foremost in mind that tourism development in South Denali is not necessarily a benign force. The Denali Citizens Council is well qualified to comment upon the damaging effects of infrastructure development along "Glitter Gulch" next to the northern entrance of Denali National Park. This development occurred incrementally over three decades in a Borough with no zoning and a planning commission with no authority. Mr. Van Doren's statement, "We wish to provide our visitors and locals with a memorable Alaskan experience without the crowds or commercialism of other visitor destinations....we look at Denali National Park, Canyon City, or Glitter Gulch as an example of what not to do," is **simply a wish**. He will have little power to make this wish a reality along the hundreds of acres of private inholdings directly adjacent to the Parks Highway in Denali State Park.

DCC Board

Nancy Bale
Jean Balay
Cass Ray

Jenna Hamm
Joan Frankevich
Nan Eagleson

Julia Potter, Community Organizer

The Denali Citizens Council submitted comments to the planning team during the South Denali Implementation Plan. We warned that during the incremental development of tourism facilities, land use planning should precede development. We understand that revision of the Denali State Park Special Land Use District is currently under way in your department. No CUP should be considered until this revision is complete. Any other action would be to take the cart before the horse.

We ask that you consider the following points when reviewing this application:

1. **Intent of the Borough Code with regard to the Denali State Park Special Land Use District.**

Under INTENT 17.17.140, the Mat-Su Borough Code states, "It is recognized that there are certain uses which are generally considered appropriate in this district, provided that controls and safeguards are applied to ensure their compatibility with permitted principal uses. The conditional use permit procedure is intended to allow planning commission consideration of the impact of the proposed conditional use on surrounding property and the application of controls and safeguards to assure that the conditional use will be compatible with the surrounding area and in keeping with the character and integrity of the Denali State Park." At this juncture it is impossible to state with certainty that this development is or will be in keeping with the character and integrity of Denali State Park. Many of the activities proposed in the CUP application have less to do with *the character and integrity of the Denali State Park* than with projected availability of a supposedly limitless supply of international tourists who are coming to see the nearby South Denali Visitor Center.

In addition:

- a. The 50 foot vegetative buffer is minimal, just meeting the current SPUD requirements, but there is a wide break in that buffer occupied by driveway and well.
- b. We wonder, is this buffer on the Parks Highway Right of Way? What will happen when the Parks Highway is widened at some future date? Will the buffer be decreased? Eliminated?
- c. What is the status of the DEC well/wastewater permit? Have downstream impacts to water quality, including impacts on a nearby stream, been adequately addressed?
- d. Whether or not there is access to nearby amenities such as rafting, hiking, flight seeing, fishing and horseback riding may be important to the owner/manager but has little relevance to the Mat-Su Borough. In fact, the presence of a new development node may tend to promote inappropriate activities in the adjacent State Park lands.

2. The intent of the Denali State Park Master Plan to maintain the natural qualities of the specific area in which this CUP is located.

Under *Land Acquisition* on page 68 of the Denali State Park Master Plan, the purchase of inholdings is recommended. “Acquisition of some inholdings or purchase of development rights should be pursued to help consolidate land ownership patterns and to avoid potential incompatibilities due to differing interests and objectives of the Division and private parties.”

In particular the DSP recommends that the state “Acquire inholdings along the **Parks Highway Mile 135-136** (160 acres)...with the management objective of protecting the natural setting and viewshed integrity from the Parks Highway Visitor Center.” The DSP cautions that, “Development of inholdings, especially along highly visible sections of the Parks Highway, may significantly degrade recreational opportunities.”

3. Intent of the Record of Decision, 2006, of the South Denali Implementation team

The Record of Decision, signed by representatives of the National Park Service, the State of Alaska and the Mat-Su Borough, states (page 5), “The agencies will protect scenic qualities of the Parks Highway and Petersville Road corridors...” and “The Matanuska-Susitna Borough will work with local communities to establish land use controls for private lands along the Parks Highway the Petersville Road,” and “The Alaska Department of Natural Resources will work with the Matanuska-Susitna Borough, the local government with zoning authority, to update the current Special Use District in Denali State Park...” Planning and zoning standards must be finalized and must precede development.

4. The precedent-setting nature of this permit request argues for restraint.

This development, crowded onto five acres, is the first of **many potential developments** in a large sector of private lands adjacent to the Parks Highway. In view of the precedent setting nature of this activity, it is prudent for the Mat-Su Borough Planning Commission to deny this permit until a comprehensive approach is developed, an approach that considers the standards addressed in points 1 -3 above.

We at Denali Citizens Council are not opposed to private development as part of a comprehensive approach to South Denali tourism. However, in order to avoid haphazard, unmanaged growth, and real damage to the character of Denali State Park, the Mat-Su Borough must act proactively. This permit has too many unknowns and problems to be granted in its current form. We request to be kept on your mailing list for further opportunities to comment or to appear at meetings or hearings.

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