

March 9, 2012

Dear Superintendent Anderson,

Thank you for the opportunity to comment on the National Park Service's proposal to plow the Denali Park Road, starting next winter. At first glance, it would seem that this could be done with minimal impact to the Park's resources and infrastructure. However, Denali Citizens Council has identified a few areas of concern that we would like to see addressed in the EA resulting from this scoping period.

The 2006 *Backcountry Management Plan* established the unplowed road past headquarters as backcountry, and we would like to ask NPS to clearly demonstrate the purpose and need to change this policy only six years later. We are concerned about the precedent that could be set by changing a segment of the BMP at the suggestion of any one individual or interest group. We ask that NPS identify the reasons for reintroducing this issue now, and to show that circumstances have indeed changed enough to warrant consideration of overturning a decision made in the BMP.

DCC is very concerned about displacing existing winter use of the unplowed park road. We believe that a major reason that plowing the road was rejected in the 2006 Backcountry Management Plan was that the unplowed surface provides the only early-season opportunity for skiing and mushing in the park, as well as the only useable early-season exit route for the park's dog teams. The "spring trail" is just that – a spring trail, not designed for use when there are only a few inches of snow on the ground. We would hate to see people using the park for outdoor winter recreation activities displaced by casual, drive-in tourists. That would be contrary to everything Denali should be about, particularly when the drive-by tourists can get to a roadside mountain view just outside of Cantwell in almost the same amount of time it takes to drive to Savage (assuming posted speed limits are followed). We would like to see NPS commit to the interests of visitors seeking non-motorized recreational opportunities along the road corridor.

This contention leads to two alternatives that NPS should consider in the EA. First, NPS should consider a middle point alternative where the road is not plowed until backcountry snow conditions are sufficient to support outdoor winter recreation activities, or until a specific date in the spring (e.g., the road would be plowed in time for use during Winterfest at the end of February). Second, NPS should compare the costs and benefits of road plowing to an alternative in which the need is met on existing plowed surfaces, for example by placing a mountain-viewing wayside along the Parks Highway in the Cantwell area while providing interpretive and other experiences between the MSLC and Headquarters. NPS should give a careful examination to see if the need can be met without displacing existing activities or incurring the ongoing extra costs of plowing.

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**DCC Board of Directors**

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DCC is adamantly opposed to any new infrastructure development to support the road plowing operation. In the 2006 *Backcountry Management Plan*, it was deemed necessary to include in the “road plowing” alternative a warming hut at Savage because of possible emergencies, or just for visitors to use while their cars warmed up. We would like to see a preferred alternative that commits to no new infrastructure, whether a warming hut, vehicle plug-ins, or trail improvements (either improvements to the spring trail or new trails). We generally support the Murie vision for the park road, and believe NPS has already gone too far in the amount of development in the road corridor. To add more infrastructure to support a questionable purpose would be unconscionable. We would like to see infrastructure improvements considered but dismissed as incompatible with the 1997 *Entrance Area and Road Corridor DCP* and the 2006 *Backcountry Management Plan*. If NPS is unwilling to firmly dismiss infrastructure improvements, then at least the EA should disclose and analyze foreseeable future infrastructure as part of its cumulative impacts analysis, since there will no doubt be requests for new facilities if Savage becomes a winter destination.

Barring any additional infrastructure west of Headquarters, questions remain about the ability of existing facilities to accommodate increased visitation in the winter. The MSLC, in its function as the winter visitor center, would be unable to hold multiple tour buses, and the DVC is unsuitable for winter use. If a major function of the road plowing is to provide more access for commercial bus tours, then the EA should consider impacts on entrance area facilities.

It seems that commercial interests are driving this proposal, and we are concerned about the range of alternatives and impacts analysis for commercial access and tours. The EA should include an alternative that restricts commercial transportation to the NPS concession operator. NPS should also consider opportunities for reinvigorating the day tour dog mushing concession that was initiated but seemingly abandoned a decade ago after 1 or 2 seasons of activity. That concession would, incidentally, benefit from an unplowed road for much of the winter. Off-road commercial use should continue to be governed by the provisions of the *Backcountry Management Plan*.

Thank you for considering our comments, and we look forward to reviewing a thorough set of reasonable alternatives in the EA.

-Board of Directors, Denali Citizens Council