

## DENALI VEHICLE MANAGEMENT PLAN RECORD OF DECISION SETS IN MOTION A COMPLEX IMPLEMENTATION PROCESS

### FINAL PLAN FAILS TO ADDRESS A NUMBER OF OUR CONCERNS, INCLUDING THE PROTECTION OF TRANSIT

by Nancy Bale

From the beginning, when NPS began scoping meetings for a new way to manage transportation in Denali, we at DCC were concerned. What, we asked, was so wrong with the existing system? Unscientific management, we were told. According to NPS, the existing vehicle cap of 10,512 vehicles per 110-day summer season was not based on science. A new, scientific way was needed to ensure protection of resources (and, it seemed to many, to allow increases in traffic). NPS used its research on the park road to design a system of indicators and standards, which the agency claimed would determine when vehicle numbers were nearing the carrying capacity of the road. When standards were exceeded, traffic would be reduced or re-adjusted using this adaptive management scheme to protect resources.

The Draft Vehicle Management Plan (VMP) Environmental Impact Statement, released in Summer 2011, contained provisions for determining a yearly capacity number, using adaptive management, but the Draft Plan contained no firm, overriding cap. Comments on the Draft Plan revealed a flurry of public opinion encouraging NPS to keep the existing regulatory cap of 10,512 vehicles.

In answer to comments seeking a limit, the Final VMP EIS, released in Summer 2012, offered a daily cap, 160 vehicles west of Savage River in any 24-hour period. Computerized modeling had shown that this cap would remain within standards. However, the agency picked the largest daily number that could be modeled successfully, rather than starting with a more conservative approach.

We at DCC knew that existing traffic levels on the park road were nowhere near that number, and had only very rarely reached 160 vehicles per day, usually during heavy contractor traffic during construction. We suggested a cap of 145 vehicles per day, a more conservative approach that would still allow some growth in the system. Our suggestion was brushed aside.



The Record of Decision (ROD) accepting the Final Denali VMP was signed by Paul Anderson and Sue Masica on September 27th. The ROD made none of the changes DCC suggested. The ROD has not yet been recorded in the Federal Register. Photo by Kim Turnbull

### Daily cap in Final VMP could lead to impairment

NPS went into this planning process with a firm and functional cap on park road vehicle traffic and a firm allocation among transit buses, tour buses, and Kantishna inholder traffic. NPS comes out of the process with a greatly increased limit that has virtually no real-world testing, no allocation between tour and transit buses, and no limits on Kantishna day use traffic. Once the 10,512 seasonal cap is removed, combined with the removal of vehicle allocations, a major barrier to package tourism growth will disappear and companies will feel more comfortable about investing in new hotel rooms. Once that occurs, NPS will find it very difficult to go backward if the new system doesn't work out.

In the 1997 General Management Plan amendments, the strong message from NPS was *the road is full, future visitation growth will be accommodated in entrance area facilities and south side developments*. Now, NPS has signaled that the agency will be happy to find ways to accommodate more traffic. Those concerned about conservation of the park who accepted the 1997 amendments because they seemed a reasonable way to protect the park road are worried.

*learn more on page 4*

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# FROM THE DCC BOARD

## CHOOSING A STORY

by Erica Watson

The DCC Board of Directors' recent decision to appeal the court's ruling on Healy gas exploration wasn't made easily. There are good reasons to have done otherwise, outlined elsewhere in this newsletter, and the choice we made prioritizes principles over material concerns. And we'll see what the future brings.

Throughout this conversation and others, I've become deeply aware, sometimes painfully so, of the dichotomies which seem to frame our options: practical vs. ideological; hopeful vs. cynical; optimistic vs. pessimistic. Especially under political circumstances where attempts to mitigate the effects of climate change are presented as a punch line rather than a necessity, it can be difficult to get behind a decision firmly rooted in ideology but financially impractical. But I think these dichotomies give a false sense of simplicity to the issues we face. I don't mean to suggest ignoring material circumstances of the bureaucracies and bank accounts we sometimes have to negotiate with—that would be hugely impractical—but to stretch their complexity a bit further than the idea that each issue has only two sides allows.

Last summer in Anchorage, Gary Snyder spoke about his disdain for “liberal doomsday” media, and the distraction it provides from genuine engagement with the local places and communities where our actions can make a more immediate difference. He said that “you don't need to worry about overpopulation in Homer,” and this statement was met with some resistance from his audience, especially those from Homer who see that global environmental crises very much reach even the end of the road: everything affects everything else, doesn't it? Geographical isolation no longer means political or environmental isolation, if it ever did. Snyder's message was informed by his own Buddhist spirituality, but the sentiment behind it can also be helpful in thinking about the work we do for the integrity of our home places: our efforts are most fruitful when focused on our smallest-scale communities, and successful cultivation of meaningful change is closer at hand, and can be experienced by a larger percentage of a small population than a large one.



DCC photo

After Snyder's talk, I thanked him for his optimism (I knew it wasn't the most articulate response to such a complex discussion, but I was admittedly a little star-struck). He chuckled, and said something to the effect of “I don't think of it as a question of optimism or pessimism.” It is, always, more complicated than that.

In deciding how to move forward with a legal challenge, or any situation which can be boiled down to “hopefulness” or a lack of it, we are not just working for a desired outcome, but also consciously constructing a history or a narrative. We are building alliances and leaving an official record of our commitments.

In a recent interview on [terrain.org](http://terrain.org) ([terrain.org/interview/30](http://terrain.org/interview/30), Holly J. Hughes; published 10/15/12), Alaska writer Nancy Lord commented on the importance of doing work despite, or outside of, the spectrum of hopefulness. She says the following:

*"I'm really not very hopeful about humans' ability to respond in time to the crises we've visited upon the Earth...I've reconciled my own discouragement with thinking that we each need to continue to do what's right for the Earth and all those who call it home because that's simply the right, ethical thing to do. We need to continue to note and remark upon the beauty we encounter each day and to encourage those coming along to think clearly about the human condition, to be creative in problem-solving, and to know wind and water."* 

# THANK YOU, MEMBERS & DONORS

by Nancy Bale

To all of our members and donors DCC extends the happiest of holiday wishes. We are in the midst of fall renewal. If you have not received a renewal letter and are curious about your status, please contact us at [mail@denalicitizens.org](mailto:mail@denalicitizens.org). Please consider an extra donation above your usual renewal before year's end.

And remember, too, that joining online is very easy. Go to the homepage of our website, <http://www.denalicitizens.org>, and click the menu bar tab labeled **Join DCC**. You will be directed to a page that describes the benefits of membership and gives you a button to click forward to our secure, donation site.



Alaska Native Knowledge Network

## Conservation Issues Dessert and Discussion - McKinley Village Community Center - 7 PM, Saturday Dec. 1, 2012

The DCC Annual Board Retreat will meet at Nan Eagleson's home all day Saturday and Sunday morning, and will discuss the entire scope of DCC's activities, including past and future vision and mission, our priority issues, our board and its duties, and what big-picture efforts we must prioritize ahead of others. If you are interested in joining DCC as a board member, send an email to Charlie Loeb, [charlie@denalicitizens.org](mailto:charlie@denalicitizens.org).

In addition, we are sponsoring a **Conservation Issues Dessert and Gab Session** at McKinley Village Community Center on Saturday evening, December 1st, 7 PM. Bring your friends. You know our key issues right now; Healy Gas, Future of the Stampede Townships, NPS management issues, Wildlife Management at the Boundaries of the Park, a possible gas pipeline down the Parks Highway. However, you may have conservation ideas of your own, and perhaps you'd like to use our resources to get the word out. All ideas are welcome!

## Congratulations, Wally and Jerri Cole, recipients of Celia Hunter Award

In September, the Alaska Conservation Foundation, at its annual awards dinner, bestowed the 2012 Celia Hunter Award to area residents Wallace and Jerryne Cole for outstanding volunteer contributions to conservation causes during their long and continuing career in wilderness education at Denali National Park. Through activities at the Denali National Park Wilderness Centers, Camp Denali and North Face Lodge, the Coles have promoted recognition of National Park values through outdoor experiences, knowledgeable resource leaders and sustainable business practices. And great staff! Outside of their business, they have each served on numerous conservation boards and have volunteered their personal time and resources in hosting a variety of conservation meetings and events at their homes in Anchorage or at Denali. It was wonderful to watch them receive the award in a room filled with similarly-talented and giving individuals and amongst good friends. Know that you deserve recognition, Wally and Jerri! DCC additionally thanks the Coles for their generosity when, as part of their prize, they asked ACF to grant \$1,000 to DCC. 🐾

### THANK YOU, DONORS

#### MAJOR DONOR

Joan Frankevich  
JJ Neville

#### TAIGA

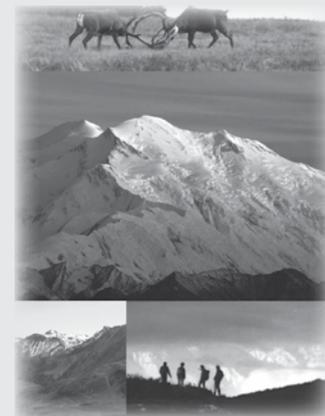
Kevin Clement  
Art Greenwalt  
Julie Jessen

#### TUNDRA

Sarah Crowley

#### ALASKA CONSERVATION FOUNDATION

Grant of \$1,000 recommended by  
Celia Hunter Award winners Wallace and Jerryne Cole



## VEHICLE MANAGEMENT PLAN RECORD OF DECISION - *continued from front page*



Photo courtesy of Kim Turnbull

### Can adaptive management protect the park?

Our frustration with the Final Vehicle Management Plan does not mean there were no useful concepts in the plan. NPS used research from the Road Capacity Study to put stipulations into the plan that would preserve nighttime traffic lulls and gaps for seasonal sheep road crossings. These actions were an attempt, even if token, to protect wildlife resources scientifically.

However, many of the plan's indicators and standards were focused less upon resource protection than on what humans who travel the park road could tolerate, such as numbers of buses at rest areas, wildlife stops and in the viewshed. Whether or not these types of measures can protect Denali's wilderness values is still up for debate. We do know that the plan's standards will allow for **growth** in seasonal traffic numbers, at least theoretically, far beyond current levels.

Not only are we concerned about what the standards measure, however. We're concerned whether they will be monitored frequently enough and adjustments made in a timely enough fashion to prevent impairment of both the remote, primitive character of the park road and visitor experience. The complexity of this adaptive management system, its ultimate cost, its viability over the long haul, the adequacy of its elements in protecting park resources as visitation grows - these are matters of real concern to DCC.

We know this much; the cap of 160 vehicles per day, even if never attained, could, simply by being "out there" in the Final Plan, encourage unsustainable growth at Denali's gateway. The gateway to Denali area has already experienced a period of unprecedented growth from the 1980s until the early 2000s. This growth was not encouraged by NPS, but the agency had no choice but to accommodate it with an unprecedented buildout at the entrance area of the park itself. Could such a stimulus-response happen again?

### The Transit System - can a demand system survive under the new VMP?

The Final VMP has committed to optimizing access, with an emphasis on filling buses. Filling buses is fairly easy to do through pre-booking of Tour buses. It is not so simple to do with the Transit system, which was originally designed to be a demand system, like any public transit system.

We do not know what an emphasis on filling buses will do to the Transit concept. Although the VMP gives lip service to the priority of the Transit system, it does little to reveal how the Transit system will be operated, day to day, to be user-friendly, easy to access and reliably available. The details of managing this system will be left to contract negotiations over the next couple of years.

One worrisome feature of the plan: there will be no separate Camper Bus in the Transit system, the new emphasis being on a uniformly-sized vehicle with maximum occupancy. Another worrisome feature: the plan has only one indicator that protects Transit, *Hiker Wait Time*. We suggested another, *Departure Wait Time*. Our idea was rebuffed.

Underlying specific problems with Transit seems to be a fundamental misunderstanding by NPS about the nature of Transit. The agency regards the Transit buses as a commercial service rather than as an essential public service providing the only means of access to the park. Throughout the park system, concessions offer services that visitors desire, but ultimately can choose not to utilize.

This is not the case with the Transit buses. They are the only method of inexpensive, public access to the park, and constitute an obligation NPS took on when it closed the road to private traffic in 1971. DCC asked repeatedly that NPS approach the Transit system as if it is a public bus system. We are mystified as to why NPS is unwilling to at least recognize the value of offering a true Transit service, even if the agency is presently prevented from making changes to remedy its dependence on the concessioner.

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**Snacks for a Premium Tour to Tek?** Seen at Teklanika Rest Stop in August 2012.

Photo courtesy of Hannah Ragland

## VEHICLE MANAGEMENT PLAN RECORD OF DECISION - *continued from previous page*

**Marketing changes to protect Transit** - During initial NEPA process, NPS representatives committed to examining marketing scenarios that would more fully present the range of transportation options to park visitors, in an effort to more realistically and accurately market the Transit service. A study of these scenarios was not yet complete as the Final Plan came out. We'd still like to see it.

### **Toklat and Teklanika - uncertain futures**

Although the Final VMP included some references to the Toklat and Teklanika Rest Stops, no determination of their ultimate futures was made. Roadside infrastructure was said to be "beyond the scope" of this plan, and the EIS insisted that no changes in infrastructure would be required to implement the plan. From the beginning, though, we argued that infrastructure should have been analyzed alongside any road management changes, as it was in the 1997 Entrance Area and Road Corridor EIS.

The Teklanika Rest Stop will likely feel impacts from VMP implementation soonest. The former Denali Natural History Tour could send all or a significant portion of its buses to Teklanika as a Premium Short Tour, under the plan. This was already piloted in the summer of 2012.



Toklat VC ?

DCC photo

The Final Plan mentioned a "Toklat Rest Stop Visitor Center" (probably referring to the temporary structure placed there by Categorical Exclusion several summers ago). This "Visitor Center" should not be represented in any document as anything but temporary until further analysis and NEPA compliance determine that a permanent structure is appropriate at Toklat. As far as we know, Toklat is still a Rest Stop, not a Visitor Center.

It's pretty clear that both Toklat Rest Stop and Teklanika Rest Stop could grow beyond their currently-envisioned sizes as the result of this plan, even with vehicle monitoring remaining within standards. The plan was remiss when it failed to consider these growth impacts.

### **Kantishna - no limits on day tours?**

We supported and applauded the VMP's decision to consider non-overnight trips into Kantishna lodges (day tours) as not "inholder access" but a commercial activity subject to concession or commercial use authorization. DCC supported a numeric limit to the numbers of day tours. We felt there was adequate evidence for keeping this allocation at two trips per lodge, which is the current situation, two trips into the Kantishna Roadhouse and two trips into the Denali Backcountry Lodge. This limit was in the Draft Plan, Alternative B.

However, in the Final VMP, all language about numeric limits on day tours was removed and it was asserted, instead, that the more restrictive indicator/standard regime for Wildlife Viewing Subzone 3 (that section of the park road between Eielson Visitor Center and the Y at Wonder Lake) would adequately limit the growth of these activities.

We disagree wholeheartedly with this conclusion and attribute it to NPS' (in our mind misguided) belief that adaptive management is adequate enough to be the sole metric used in limiting activities. One potentially damaging and perhaps unforeseen impact of the philosophy of "no numerical limits on commercial use authorizations to Kantishna" could eventually be competition between valid inholder access and commercial day access into Kantishna.

Recent upgrades to that portion of the road that constitutes Wildlife Viewing Subzone 3 (paid for by the American Recovery and Reinvestment Act) have made that section safer for larger vehicles. While we accept the theory behind these upgrades, we at DCC were involved throughout the NEPA process to urge caution on their scale and scope. Such changes tend to open the door wider to large commercial vehicles, not a negative in its own right, but subject to overzealous and potentially damaging commercial uses.

### **Denali Vehicle Management Plan: you have a role**

NPS anticipates that much of plan implementation will await the start of the next concession contract, scheduled for 2014-2015. In the interim, NPS and the current concessioner will continue to gather indicator data from GPS units and driver-operated panels, and to experiment with new tour concepts and bus hardware, to align with the concepts of the plan.

There is much left to be done during the implementation of the VMP. Environmental compliance, including EAs or regulations, will be required on many of the plan provisions, including the proposed daily cap and infrastructure changes. This will give citizens yet another opportunity to weigh in publicly, in the hope of productive changes. We at DCC will keep you informed of any and all comment opportunities during plan implementation. ☞

# DCC FILES APPEAL OF HEALY GAS BIF IN AK SUPREME COURT

## DCC BOARD CONTINUES TO WEIGH OPTIONS IN THE WAKE OF ALASKA SUPERIOR COURT DECISION

by Jared Zimmerman

Denali Citizens Council is continuing its ongoing legal challenge to the Best Interest Finding for the Healy Basin Gas Only Exploration License and has appealed the issue to Alaska's Supreme Court. The license authorizes Usibelli Coal Mine, Inc., to explore for natural gas over much of the northern Denali Borough, including around Healy, Ferry, and lands west to the Savage River.

DCC has argued that the Final Best Interest Finding failed to consider a smaller license area that would allow for gas development in areas where it wouldn't undermine residential property value or damage important wildlife habitat and recreational opportunities. Just as importantly, DCC also argued that the State of Alaska's Final Finding failed to justify its rejection of strong mitigation measures to protect property owners and residents, despite growing national awareness about the problems that gas development can bring to rural communities.

On September 7th, Judge Andrew Guidi issued a decision ruling in favor of the Department of Natural Resources, which allows the Final Best Interest Finding to stand, thus virtually guaranteeing continued conflict over gas exploration and development in the Denali Borough.

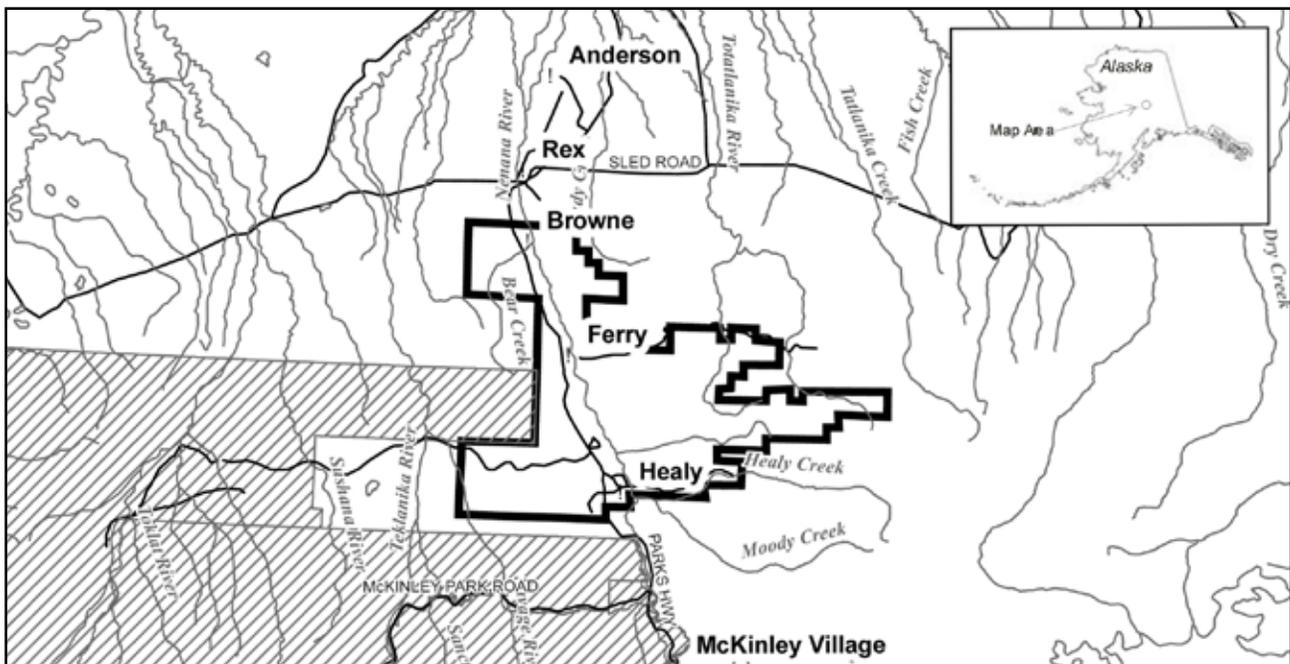
DCC's appeal of a Superior Court Judge Guidi's decision was filed at the Supreme Court on September 28, 2012. As is typical in the administrative process, the Supreme

Court judges will review the lower court's reasoning and fact-finding in its entirety, but the high court does not show deference to the lower court's ruling. In addition, the Supreme Court can consider constitutional arguments that DCC was unable to raise in Superior Court.

DCC continues to need money to fund this appeal and for future legal needs related to gas development in the Denali Borough. For more information on how to support this effort, look for the Gas Legal Fund button on the DCC homepage. In the future, the Gas Legal Fund may be used to obtain legal assistance when reviewing permits or plans of operation, challenging compliance with permit conditions or other requirements, developing resources for landowners to utilize when negotiating surface use agreements, or engaging in other similar activities.

DCC has always assumed that some level of gas exploration would eventually take place, and is actively preparing for that eventuality. In fact, we never opposed gas development over much of the license area requested.

At the moment our major project is the creation of a Citizens Guide to Gas Licensing, a joint project with National Parks Conservation Association. Intern Claire Pywell is presently working on the Guide, to be completed in January. 



Map of Healy Gas Exploration Area

Map by Alaska Department of Natural Resources

# EPA AND GVEA NEGOTIATE A CONSENT DECREE FOR HEALY 2

by Charlie Loeb

The long saga of the Healy Clean Coal Project (HCCP, or Healy 2) has reached another chapter. The Environmental Protection Agency (EPA) has negotiated a deal with Golden Valley Electric Association (GVEA) and the Alaska Industrial Development and Export Authority to allow Healy 2 to receive an air quality permit, a necessary regulatory step prior to GVEA's operation of the plant.

The Alaska Department of Environmental Conservation, which administers EPA's air quality program in Alaska, had previously issued a permit, but a petition to EPA by DCC and other conservation groups led to more active involvement by the federal agency to protect Denali's Class I airshed. The final result is a higher level of pollution control than required by the state.

The consent decree (an enforceable court order) between GVEA and EPA requires several actions on GVEA's part. These include:

- Installation of Selective Catalytic Reduction (SCR) technology on Healy Unit 2, providing the most modern pollution controls on the new plant;
- Installation of Selective Non-Catalytic Reduction (SNCR) technology on the older Healy Unit 1 by 2015 – two years earlier than otherwise required – and a requirement to close the unit or upgrade to SCR by 2024;
- Compliance with annual tonnage limitation for designated pollutants;
- Installation of continuous emissions monitoring systems to measure stack emissions;
- Funding of a \$250,000 program for replacing old wood- and coal-burning stoves with cleaner, certified modern stoves in Fairbanks-North Star and Denali Boroughs (with \$75,000 designated for the Denali Borough).

EPA estimates that it will cost GVEA \$40 million to implement the requirements, on top of the \$50 million required to buy the plant from the Alaska Industrial Development and Export Authority. Even with these expenses GVEA believes it will be able to generate less expensive electricity from Healy 2 than from some of its existing sources.

The air quality permit was perhaps the greatest obstacle to the opening of the plant, and GVEA is estimating that it can bring the plant online in 18-24 months.



Healy coal-fired power plant, Nenana River in the foreground.

*DCC photo*

Conservation groups had earlier tried to reach a consent decree with GVEA that would have eliminated the need for EPA involvement. That consent decree was predicated on fixed shutdown dates for Healy 1 and Healy 2. Late in the discussions, GVEA abruptly pulled out of negotiations and then tried to publicly bully the conservation organizations into not challenging the state permit, culminating with a company-sponsored demonstration in front of the offices of the Northern Alaska Environmental Center this past summer. The co-op utility's persecution of a portion of its membership was not well-received, and while no official linkage was ever made, company CEO Brian Newton suddenly resigned shortly thereafter. DCC and the other conservation organizations persisted in a petition to EPA, pushing for the strong measures protecting local air quality and Denali's Class I airshed.

Here at DCC we feel very good about the positive results from our involvement in this process, while still recognizing that burning coal has some severe consequences not addressed by the consent decree, such as mercury contamination, carbon dioxide emissions and coal ash disposal. We believe coal should be viewed as a short-term solution to energy needs in Alaska, to be replaced by more sustainable fuel sources as soon as possible.

EPA accepted public comment on the consent decree until November 9, 2012. No objections were made, and the consent decree now moves to a federal court for final approval. 

# YUKON-TANANA AREA PLAN REVISION REAFFIRMS KEY HABITAT/RECREATION VALUES IN STAMPEDE TOWNSHIPS

STATE OF ALASKA PLAN REVISES TANANA BASIN AREA PLAN AND SETS LONG-RANGE VISION FOR AREA

by Hannah Ragland

On August 31st DCC submitted comments on the state's proposed revisions to the land use plan that oversees management guidelines in and around the Denali Borough. The Yukon Tanana Area Plan (YTAP) includes many areas previously under the guidance of the Tanana Basin Area Plan (TBAP). The Department of Natural Resources (DNR), Division of Mining, Land and Water, accepted comments on the Draft YTAP for two months this summer. DCC expressed support and raised concerns about a number of units within the planning area, including the Stampede Townships, Yanert and Alaska Range, Nenana River, and Toklat Springs. On October 1st the state responded to comments and is accepting additional comments on its findings through December 3rd.

## Stampede values recognized, management actions deferred to SRA proposal

In its response to comments, DNR agreed that the proposed Stampede State Recreation Area (SRA) was a locally supported idea, and agreed to indicate this in the appropriate units' management intent. Specifically, in the final plan, DNR has committed to acknowledging that efforts to create an SRA "have occurred and that an entity of the type that has been previously introduced in legislation is compatible with the land use designations and management intent of the units in the Wolf Townships (or some portion of this area) and is considered appropriate for establishment in this area."

The state concluded that this proposal is a local issue, and that recommendations should come from the local community and state legislative representatives. In the final plan, under the regional Management Summary, additional information will be included that supports this. DCC appreciates this mention, and would also like to see the YTAP formally recognize the State Recreation Area proposal as a recommended legislatively designated area (LDA). DCC recently sent comments to the state requesting this inclusion.

## DCC asked that the plan include provisions for a step-down recreation management plan

In our comments, DCC had requested a step-down recreation management plan for the Stampede/Wolf Townships as a way to manage recreational uses in the absence of a legislatively designated State Recreation Area. DNR did not agree to this recommendation, suggesting that

these actions would not be necessary if a State Recreation Area designation were to occur. DNR suggested that a special use area designation could be pursued "if the community is unsuccessful in its efforts to establish an SRA" and that it "can be established through an administrative act by DNR and its development is not dependent on the recommendations of this plan." As for a step-down management plan (an idea discussed at the Stampede Summit this summer), DNR concluded "this recommendation may be appropriate, but at this time the community supports the creation of a SRA." While waiting for a State Recreation Area designation, the state is hesitant to pursue other management options.

In our second round of comments on the revised plan, DCC asked DNR to provide back-up alternatives for special use area designation or a step-down management plan to ensure that protection of recreation and wildlife habitat in the Stampede/Wolf Townships is not delayed by a lack of legislative action.

## Revised plan's classifications along Stampede corridor heavily support habitat and recreation

DCC voiced support for the classification of P-80 through 87, and P-93 as Habitat (Ha) and Public Recreation-Dispersed (Rd). This includes all of the land proposed for inclusion in a State Recreation Area, and land north and south of the Stampede Road corridor. Identifying Habitat as a land classification generally requires that the state retain ownership. It should be noted that Unit P-87, composed of several tributaries to Panguingue Creek that run through the Panguingue Subdivision, is classified only Public Recreation-Dispersed (Rd), and not also Habitat (Ha). The management intent of this unit does direct that the state maintain ownership of state-owned land within this unit.

Two units in the Panguingue Subdivision call for additional scrutiny. Unit P-88 is divided into two subunits, adjacent to both the Panguingue Subdivision and the newly gained Borough property surrounding and adjacent to the subdivision, known as "Panguingue B." Unit P-89 is south of P-88 and Panguingue B, and also borders the Panguingue Subdivision. DNR has stated that a Municipal Entitlement affects Unit P-88, but it is unclear at this time whether the Borough has ever requested this parcel as part of its entitlement from the state. DCC requested that the western subunit and western half of the eastern subunit of P-88 be retained in state ownership as Wildlife Habitat (Ha) and

*continued on next page*

## YUKON-TANANA AREA PLAN ESTABLISHES A HOPEFUL VISION FOR LOCAL LAND MANAGEMENT

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Public Recreation-Dispersed (Rd). Unit P-89 has been identified as a potential Mental Health Trust Authority selection. DCC requested that a back-up classification be identified should the Mental Health Trust Authority or the Denali Borough not select one of these units. Although there is some precedence for this type of back-up classification, DNR had not agreed to consider an alternative classification for either of these units, and DCC sent additional comments suggesting that it do so.

### **Yanert land classification remains protective, in response to DCC and other local input**

The Final YTAP agreed with DCC's support for maintaining classification of Yanert Valley units, while changing the classification of one unit from General Use to Habitat and Public Recreation – Dispersed. This unit of land, identified as P-60, is approximately one mile east of the Parks Highway between McKinley Village and Panorama Mountain. Its initial classification of *General Use* in the Draft YTAP could have allowed the state to relinquish its ownership in land sales or disposals. The state's response to comments on Unit P-60 pointed out that public comment "substantiated the use of this area for recreation, particularly for hunting, and review of habitat data indicated the presence of sensitive moose habitat." The final plan's description of Unit P-60 will now also indicate "the parcel will be retained in state ownership and is to be managed for its public recreation and habitat values and uses." This is a true "win" for Yanert locals who value these lands for their unique scenic and recreational values.

### **Nenana River's recreation & habitat values upheld**

DCC supports the state's continued recommendation to establish a State Recreation River along portions of the Nenana River corridor in the Denali Borough. This recommendation, which first appeared in the TBAP, was upheld in the YTAP. Although the units recommended for legislative designation do not include the full riparian area, they do include much of the river corridor that is used extensively in the summer for private and commercial recreation. Other units along the Nenana River (P-56, P-63-65, P-71, P-76, P-98) are also important pieces of the river corridor, and continue to be classified as Habitat (Ha) and Public Recreation – Dispersed (Rd). DCC is pleased that these lands will remain in state ownership with formally recognized habitat and recreation values.

### **Small area around Toklat Springs retains Critical Habitat recommendation**

The YTAP continues to recommend the creation of a Critical Habitat Area for approximately 2,000 acres around the Toklat Springs (Unit K-68). The main body of the Toklat River is classified Habitat (Unit K-61). DCC supports this classification, and went further to request more protective classifications of adjacent riparian areas and wetlands. In comments to the state, DCC expressed concerns about a new Settlement area (Unit K-69) immediately east of the Toklat River. This unit includes several miles of the Sushana River just upstream of Toklat Springs. DCC requested that several sections of land be reclassified on the western edge of K-69, so that the wildlife corridor along the Toklat River could be expanded.

DCC also requested that the Department of Fish and Game be contacted to determine appropriate wildlife corridors before any development occurred. The state responded that K-61 and K-68 provide adequate corridors for wildlife movement, and that "the existing management intent language for this unit requires the avoidance of wetland and riverine areas." DNR also did not feel that there was a need for additional Fish and Game approval or consultation. DCC is happy to see the Toklat Springs Critical Habitat Area recommendation, but will follow up with the state to request clearer protections for wildlife corridors around Toklat Springs, and a measured approach to land disposal for settlement near such valuable habitat.

### **DNR's consideration of individual comments is refreshing**

DCC appreciates that the state considered each unique comment that was submitted, was inquisitive about a number of our comments, and gave specific reasons for why individual comments were accepted or denied. To see consideration of individual comments is a refreshing reminder of how public process can work to serve the public interest. DCC intends to follow-up on the state's response to comments. Look for updates and copies of DCC's comments on our website. Comments on DNR's recent issue response summary are due on December 3, 2012. If you have more to say on this plan, go to the plan website for details, at <http://dnr.alaska.gov/mlw/planning/areaplans/ytap>.

And, thank you to all members who commented on this plan. You helped craft a better planning vision for our area.

✎

# PETITION TO PROTECT DENALI WOLVES OUTSIDE THE PARK DENIED

by Barbara Brease & Charlie Loeb

The Alaska Board of Game (BoG) denied a recent petition to provide emergency measures to protect Denali's wolves. The petition requested that the Alaska Board of Game establish an Emergency Regulation closing state lands along the eastern boundary of Denali National Park to the human killing of wolves.

The petition, submitted by four groups (the Alaska Wildlife Alliance, National Parks Conservation Association, Defenders of Wildlife, and Alaska Center for the Environment) and six individuals had strong public support. The petition was submitted in response to last spring's snaring death of the Grant Creek breeding female and the NPS Spring 2012 wolf survey results showing a decline in the wolf population, backed up by sealing records showing an increase in wolf trapping. The closure would have stopped hunting and trapping of the wolves seen by park visitors as they cross the park boundary onto state lands. Petitioners asserted that a no-kill area would prevent further declines in wolf numbers and wolf-viewing opportunities at Denali.

Despite new information now available regarding the destructive impacts of wolf hunting/trapping/snaring on state lands adjacent to the park, the BoG rejected the petition "because it failed to meet the emergency standards set forth in regulation," according to BoG member Teresa Sager-Albaugh of Tok. The petitioners have decided to appeal this rejection.

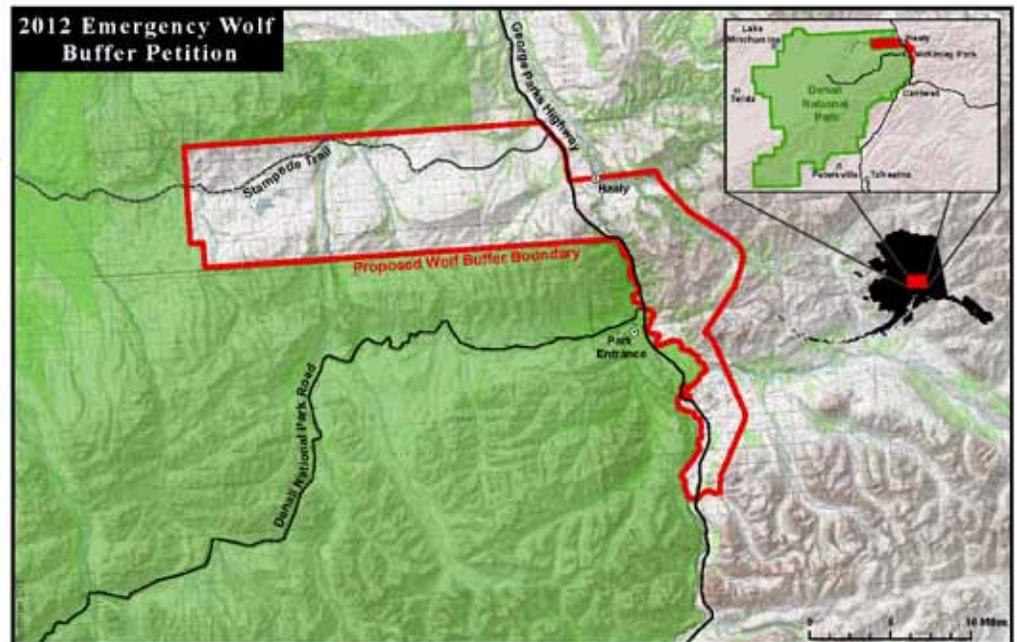
DCC is looking ahead to creating a new proposal for a permanent – rather than an emergency – closure. While the BoG voted in 2010 not to consider this issue again until 2016, we at DCC think the subject can be reconsidered at any time, by a simple majority vote.

## A successful proposal to the Board of Game will have several important elements

These are:

- 1) The proposal should be backed by strong data from the National Park Service regarding impacts on park wolves and wolf viewability by park visitors. NPS is continuing to development this information.
- 2) The conservation community should submit a unified proposal, unlike in 2010 when multiple buffer zone proposals were submitted, making it look as if there were no public agreement about the scope of such a zone.
- 3) Every effort should be made to secure the support of the Middle Nenana Fish and Game Advisory Committee, which has backed conservation positions in the past (most recently on rejecting the opening of the Yanert Closed Area to some motorized hunting).
- 4) A massive showing of public support is essential.

DCC has published a public petition calling for the reestablishment of the Stampede Closed Area, and is collecting signatures. While smaller than the area proposed in the petition discussed above (the Stampede Closed Area includes all lands in the Wolf Townships west of the Savage River), it has the potential for more local support. The petition can be found through a link on the DCC homepage, or link directly at <http://www.ipetitions.com/petition/restore-denali-wolf-buffer>. ☞



Map provided by National Parks Conservation Association

## BRIEF NEWS AND VIEWS

### AIRCRAFT OVERFLIGHTS COUNCIL CONDUCTS A FALL MEETING IN ANCHORAGE

The Denali Aircraft Overflights Advisory Council met on October 26th, in Anchorage. Chartered in 2007 by then Secretary of the Interior Dirke Kempthorne, the Council is charged with developing ways to mitigate effects of motorized sounds over Denali National Park. One outcome of the Council's activities has been the development of "Best Practices" for pilots to utilize over certain key areas of the park where motorized intrusions have been viewed as a problem or where backcountry visitors expect to hear natural sounds only.

At the most recent meeting, Council members met Acting Denali Superintendent Jeff Mow, who will be at the helm until a new Superintendent arrives in early 2013. New physical sciences chief Dave Schirokauer gave the council details of a monitoring sheet that backcountry rangers plan to use to assess the impact of aircraft sounds while they are on patrol, to determine whether or not the council's recommendations and pilots' voluntary practices are benefitting the park soundscape.

The Council put the finishing touches on a Fact Sheet, soon to be available for park guests, describing the Council's activities. Several NPS researchers informed the Council of trends in aircraft use in the park, including aircraft use by NPS itself. DCC board member Nancy Bale sits on the Council, one of twelve members from a variety of stakeholder groups. The Council's website has comprehensive information on its years of operation. See the website at <http://www.nps.gov/dena/parkmgmt/aoac.htm>.

### BYE, BYE JARED! SEE YA AT THE ASSEMBLY

We are going to miss our esteemed secretary, eloquent public speaker, avid Stampede friend, all-around good guy, DCC board member Jared Zimmerman, who has decided to leave the frying pan and plunge into the fire after being elected to the Denali Borough Assembly.

We know we'll still see you, Jared, but we'll miss you on all those Skype board teleconferences, with the dogs gently cooing in the background, and the conversation ranging far and wide to cover DCC's range of issues and interests as the connection drifted in and out. All we can say is, we'll miss you, and Denali Borough government is fortunate to have you!

### DENALI NATIONAL PARK & PRESERVE QUARTER ROLLED OUT IN HEALY

The Tri-Valley Community Center was the scene, on November 15th, of a well-attended event at which the newly-minted Denali Memorial Quarter was offered for sale to the public for the first time. We hear that the line for rolls of quarters stretched through the community center at one point. An image of the quarter appears on the right. We're told that the ram is depicted on the *Tails* section, whereas George Washington is featured on the *Heads* section.

## DCC NEWS

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Denali Citizens Council is a nonprofit 501(c)(3) organization. Our mission is to protect the natural integrity of Denali National Park and to promote a sustainable future for lands surrounding the Park.

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