

Superintendent Don Striker
Denali National Park
PO Box 9
Denali Park, Alaska 99755

March 16, 2013

Dear Superintendent Striker,

On behalf of the board and membership of the Denali Citizens Council (DCC), I respectfully submit public comments on the Winter Road Plowing Environmental Assessment. A large number of DCC's 300+ members have lived seasonally or now live in the gateway regions of Denali National Park and Preserve. Many of our members rely on the park for seasonal or full-time employment. It is the park's unique landscape and resources that have attracted our members and, in many cases, influenced them to settle in this area. DCC members are among those who enjoy the park recreationally in winter, and use the snowed-over park road, in addition to other landscapes in the entrance area, for skiing and mushing.

DCC members value the existence of this park and its core values of habitat protection, wilderness character and management of wildlife in its natural diversity. Although visitor experience is an important element, it should always be provided in the context of the park's mission of resource protection. Denali is a national park, and has an obligation to ensure that visitation and access do not damage the resources for which it was established. Much of the area adjacent to the road between Miles 3-12 is designated Wilderness, a resource to be protected at the highest level. This section of road (Mile 3-12) is viewed as "backcountry" during the months of October to at least mid-March, when the road opens to plowing. There may be ways to enhance visitation during those months without losing the "backcountry" essence of this area during darkest winter. These actions would be our preferred actions.

The Purpose and Need analysis in the EA is incomplete

We at DCC are sympathetic with Denali National Park's desire to provide a range of opportunities for visitors. However, we do not necessarily accept the view of this EA that the winter visitation situation at Denali National Park is deficient, or in need of changing. In fact, winter visitation is likely to remain small compared with summer, largely because of seasonal travel patterns in the state of Alaska as a whole, and the cold and low-daylight environment from November through February. In addition, we at DCC don't think NPS has fallen short in promoting winter visitation. For several years now, NPS has maintained a winter contact station at the Murie Science and Learning Center, offering ranger hikes and interpretive events. In late February, NPS' Winterfest, a cooperative endeavor that spans an entire weekend, offers a diverse range of offerings. Winter camping opportunities are opened up at Riley Creek Campground. Plug-ins are available at the kennels parking lot and at the MSLC for visitors who wish to get out of their cars and move into the landscape.

DCC Board

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Now we have a Winter Road Plowing EA intimating that without motorized access to Mountain Vista, the park is not adequately providing a range of visitor experiences. We need more proof. This is a big change, with several impacts. Little has been done to show data of true interest in more motorized access, except a statement that “local governments and businesses have expressed an interest in bringing visitors to the park during the winter months for mountain viewing” (p. 4). In fact, this EA appears to be targeted to a particular set of users, tour companies who want to market a “touch the park” experience to guests arriving in a motorized coach or van with the hope of taking a picture of Mt. McKinley from inside the park. There is little doubt that such a market exists, however the EA makes no attempt to analyze the size of it, the financial feasibility of providing services to it, or the out-of-park alternatives this market might have for obtaining such an experience.

Impacts Analysis misses some important topics

In the impacts analysis, the EA fails to analyze impacts on wildlife that are likely to occur under the action alternatives, and impacts on existing uses by the NPS Denali Park Kennel itself. In addition, under Impacts to Visitor Experience, NPS should have more thoroughly analyzed the impacts to existing users, who may be displaced or inconvenienced in their approach to the park. Certainly, non-motorized users **could** actually be benefitted by winter road plowing, through obtaining better access to areas of the park near the Savage River. However, their needs and the impacts of their activities there are not analyzed. The park experience of the motorized users is similarly under-analyzed, other than provision of the opportunity to take pictures of Mt. McKinley. Although NPS describes viewing scenery and wildlife as important reasons for visitation in the park (studies on page 20), NPS policies value an interpreted experience, during which park themes are imparted to all visitors. Bus drivers who operate under the park concession in summer must have training in interpretation and interpretive rangers are considered to be an important part of visitor experience. Little is said in this EA to indicate how such interpretation of park purposes will be provided or how increased, random motorized access will lead to a better understanding of park purposes.

Financial considerations are worrisome

From the standpoint of cost, we are certain that NPS could not reasonably choose any alternative other than Alternative 4 at this time, given the stated large differences in cost between it and the other two action alternatives (pg. 81). According to the description of Alternatives 2 and 3, commercial use fees or other mechanisms may be analyzed and put into place to make such activities affordable by the park itself. Such is the theory behind the adaptive management scheme under the recently-adopted Vehicle Management Plan, largely paid for by the concessioner. We were concerned there and are concerned here that if commercial operators, through fees and commercial contracts, are providing essential financial assistance to NPS for plowing or more extensive road opening, the needs of commercial operators may come to dominate the implementation of this plan.

Incrementalism is always a factor

In addition, the cumulative impacts of winter road opening and service provision have not been analyzed sufficiently. Granted, NPS commits to “further compliance” if the Preferred Alternative, Alt 4, is selected. We assume, given what we have heard so far, that Alt. 4 **will** be selected. However, having been witness to almost 40 years of recent history in Denali National Park, we are concerned regarding the inevitable drift toward further development in the entrance area represented by Alternative 4 as currently written. We believe it is naïve to assume that, once opened, the section of road from Mile 3-Mile 12 will ever again be closed in winter, except by weather.

We feel it is a relative certainty that such opening will lead to changes in Denali Backcountry Plan standards or a drift away from rest stop management guidance established in the Entrance Area and Road Corridor DCP/EIS of 1997. Denali's rest stops are already drifting toward use as mini-visitor centers. If we could be assured that, once Alternative 4 is selected, no further improvements to Mountain Vista Rest Stop will be made (e.g. warming hut, plug-ins), then we could select that alternative. However, the way the EA is framed is simply too vague and too open to more-damaging future scenarios for us to feel very comfortable with Alternative 4.

More detailed comments on the contents of this plan are provided below.

I. Purpose and Need Statement is Deficient

- a.** This EA seeks to enhance winter access opportunities, yet NPS has only considered alternatives for a single form of use: motorized. NPS did not consider any alternatives that would enhance non-motorized winter access, and appears to have produced an EIS "to rationalize or justify decisions already made" (Section 1502.5, NEPA), which violates the spirit and legal requirements of NEPA. To broaden the scope of this EA so that it is not simply focused on motorized sightseeing DCC would prefer that the plan's "two over-arching goals" be: (1) Increase the range of opportunities for winter visitors; and (2) Provide increased opportunities for winter visitors to view Mt. McKinley when visiting the park. This would provide an opportunity for NPS to fully analyze action alternatives that do not simply focus on plowing as a means to increase opportunities for winter visitors, without conflicting with the management intent of this area as identified in the Backcountry Management Plan and Entrance Area and Road Corridor Development Concept Plan.
- b.** The EA states that the purpose of the plan is to "maintain the opportunities for physically active and/or backcountry winter recreationists while at the same time allowing more visitors in vehicles access to an additional nine miles of the Park Road." However, the plan provides no guarantees that physically active and/or backcountry winter recreationists will be assured access via the Spring Trail (as described elsewhere in these comments), and should not make this assumption here. Considering the lack of information on whether or not the Spring Trail will actually be accessible to winter users, NPS must not state that the plan will achieve conditions it has not yet guaranteed are possible. These assurances currently exist at Park Headquarters for recreationists using the Spring Trail or Park Road from the Headquarters Area, and could be taken away with this proposed action. This must be discussed in more detail.

II. Legal context requires limits on future development and commercial use

- a. Concessions Management Improvement Act of 1998**, as quoted in the EA, page 6, requires that units of the National Park system must limit development of accommodations and facilities "to locations that are consistent with the highest practicable degree with the preservation and conservation of resources and values of such units." The DCC board and membership feel that national parks have a special duty to consider protection of resources when considering facility development, a duty above and beyond that of a national forest or BLM manager or a state lands manager.
- b. Entrance Area and Road Corridor DCP (1997)** - Denali Park planners have considered the above duty in past facility development plans, by indicating, in the Entrance Area and Road Corridor

DCP/EIS (1997) that the Savage Rest Stop envisioned in this plan (now called Mt. Vista) would be zoned D-2. Such areas do not offer commercial facilities and buildings are limited to smaller structures, taking into account their nearness to backcountry and designated wilderness (see Appendix D, page 275 of Draft EIS). We think that maintaining Mountain Vista, in perpetuity, as an undeveloped rest stop (as in Alternative 4), is the only alternative truly open to NPS. As such, we ask that NPS, in its final plan, openly jettison the concept of further development at Mt. Vista (plugins, warming hut, communications), even if the road is plowed.

- c. **Entrance Area and Road Corridor DCP (1997)** - Concluded that investing in winter plowing is not a feasible option when considering increased visitor services during the winter under “Impact Issues and Alternatives Considered but Not Addressed in this Document” (page 20, Abbreviated Plan), opting not to consider increased park costs in order to increase winter use because of economic considerations. In considering whether to “Provide more visitor services during winter in the entrance area and keep the park road open to the Savage River” the EARDCP declined to take action and states: “Providing more winter services was not considered because the cost of services for a small number of winter visitors would be far greater than providing activities for the hundreds of thousands of summer visitors. The cost of maintaining the park road and facilities during the winter would be prohibitive. However, proposed new interpretive facilities in the entrance area would be designed to allow for the possible year-round use of parts of these structures.” This Winter Road Plowing EA presents no new evidence to suggest action is currently needed, other than speculation that there may be interest. A Financial Feasibility Study and Monitoring Plan should be completed before any action is taken, whether temporary or permanent (see detail under **IV** below).
- d. **36 CFR Part 5.4(a)** – Requires specific authorization for any commercial service providing transportation inside a national park unit. This EA will change forever a situation that has been ongoing since the concessioner offered tours in former Mt. McKinley National Park. Except for Kantishna inholder businesses, there is one concessioner only providing transportation services in Denali National Park. We at DCC have concerns regarding the opening of the park road to more than one commercial transportation provider. Introducing other commercial transportation entities may be legal, if specific authorization is given, however the standards under which the current summer concessioner operates are stringent. Will introduction of additional transportation providers, for purposes of winter transportation, tend to dilute the tight safeguards in current transportation operations on the park road? Could it act as a gateway for introduction of multiple commercial transportation operators in the entrance area uses in the summer or shoulder season? Would the summer concessioner have reason to claim first bite at the apple for any winter transportation activities? Should NPS provide an inexpensive entrance area shuttle service if the road is open, such as provided in summer? The EA does not consider these issues.
- e. **NPS Management Policies, Chapter 10** – These policies hold NPS to a high standard for provision of commercial services, insisting that they complement the park’s mission, will not cause unacceptable impacts and cannot be provided outside the park. It is not clear that NPS has considered how individuals could have a very successful mountain viewing experience outside Denali. There is a cooperative effort to establish such an experience at the South Denali visitor center, in the foreseeable future, with winter opening options and ready access along the Parks Highway. There are dramatic views of Mt. McKinley from as near as Cantwell. Is having the opportunity to touch the park while viewing Mt. McKinley an indispensable requirement sanctioned by NPS Management Policies? DCC asserts this – such an experience could be provided, but only if is consistent with existing policies and guidance, and, again, we ask NPS to commit to no new developments at Mt. Vista if NPS selects Alternative 4, because such developments will make this activity out of compliance with NPS

Management Policies and can be provided outside the park.

III. EA fails to consider a full range of impact topics

This EA assumes that there will be no impact to Park resources, yet there have been no conclusive studies that show increased winter visitation and traffic will not impact resources. NPS must acknowledge that it does not know (with certainty) whether or how park resources will be impacted. Because of this, NPS should require that a 3 – 5 year Trial Period is mandatory for all Action Alternatives, and that clearly state that further environmental analysis is needed prior to permanent action. A Trial Period would allow for monitoring to track information on resources with different levels and patterns of use. Our suggestions are more thoroughly described below under **IV**.

a. Wildlife and habitat impacts must be considered

On page 10 of the EA, under “Impact Topics Dismissed from Further Analysis,” NPS dismissed Wildlife and Habitat from analysis as an impact topic because “animals are used to vehicles traveling on the road and the speed limit is low.” This rationale is not sufficient to dismiss Wildlife and Habitat impacts from analysis, and we urge NPS to take no action until such analysis is done. Perhaps NPS, in dismissing this topic, considered that there would be no potential or actual impacts to Wildlife or Habitat if visitors remain confined to a bus or car and step out only briefly to take a picture. However, by NPS’ own admission, these are not the only visitors whose access could be increased by plowing the road in winter. Both non-commercial and commercial groups of skiers and mushers would have access to the high tundra and ridges near the Savage River under any action alternative in this EA. Groups of backcountry users as large as 12 could be vanned up to the rest stop in the early morning and spend the entire day doing a 10 mile loop trip. Such activities could be considered commercially viable in the later months of winter-spring, say after March 1st, when the light permits and accommodations in Healy are available. Another scenario – mushers or skiers parking at the kennels lot and using the Spring Trail for access to the high tundra.

The Spring Trail EA considers and discusses Wildlife Values and Habitat as an Issue/Impact Topic and acknowledges, “Trail construction and visitor use could displace wildlife and affect habitat use.” Although NPS ultimately found there would be no impacts to wildlife as a result of the Spring Trail, this consideration only included a March 1 start date and no commercial or private vehicle use. To dismiss wildlife resources in the Road Plowing EA is deficient because previous plans have acknowledged there is a potential for impacts with lesser actions than what is being proposed now. For example, the Spring Trail EA acknowledged, “Use of the trail in the spring would create new opportunities for interactions between dog teams, skiers, and moose. Moose are alert to sounds and generally stand out of sight when hearing a dog team approach, unless the trail becomes the platform from which forage is obtained.” We believe that moose foraging is not the only potential impact, and include a number of other possible impacts NPS should consider.

This EA must consider the potential impacts to Wildlife and Habitat of this increased use. DCC offers the following data:

i. Moose –

1. Over the last several years, when there has still been snow on the tundra after the road opened (usually late March), the area south of the road at Mile 8 has been a popular destination for skiers and snowboarders. This is an area heavily used by moose and wolves. According to well-known moose biologist Vic Van Ballenberghe, too much human activity would likely disrupt wildlife use there. (see his monograph, *Behavioral Adaptations of Moose in Treeline Habitats in Subarctic Alaska*, Victor Van Ballenberghe, Alces Supplement, 1992, pp. 193-206). Too many people leaving the road to watch or photograph moose might also unduly stress moose during winter. It is to be remembered that late winter is a time of high stress for moose in general, as the energy demands of cold weather and the nutritional stress from lack of green leaves play out.
2. The EA fails to identify high value habitat that could be opened to increased off-road use by this EA, such as more protected river valleys that are important to moose in winter for forage, or areas that moose frequent to avoid predation.
3. The EA should consider the effects that increased use of the Spring Trail by dogs and humans might have upon both moose and wolves (see more on wolves below).

ii. Wolves –

1. The former wolf den area at Jenny Creek, though currently inactive, remains a prime site and available for their use. This site is within a day's ski of Mountain Vista rest stop, and its use could be impacted by increased skiing activities. The necessity of monitoring and possibly closing this area to skiers or other non-motorized users has not been discussed in the EA, nor has the increased cost to NPS for staff to monitor and enforce resource protection.
2. Wolves sustain a risk to their health by increased domesticated dog use of areas where wolves are common near the Savage River. Ski-joring and dog mushing could introduce parasites and other canine diseases into the wolf population there, in addition to the territorial stress.
3. Late winter and spring are key times for Denali's wolves, for mating and denning, in addition to being times of increased stress after a long winter. Added to any additional stress from activities encouraged by opening the road to Mountain Vista are the stressors on these same and other park wolves from trapping activities just a few miles north in the Stampede townships. Such stressors and impacts must be part of this EA analysis.

- iii. Eliminate Alternative 2** as a viable alternative, as it is much more likely that park wildlife will experience negative impacts through this alternative.

b. Impacts to traditional non-motorized users, including NPS kennels, must be considered

- i. Usability of spring trail –** There are times, including right now, we are told, that the spring trail is simply not available as an alternative to the park road for safe travel. The same problems with overflow that plague the park road, and make it necessary to provide diligent monitoring throughout the winter, plague the spring trail. If this EA is to suggest the spring trail as an alternative for non-motorized users and mushers (who can park at the kennel and plug in there, or who may arrive in the park without a personal vehicle), the EA must take a hard look at the trail's usability. It would be a shame for NPS to inconvenience its own kennel operators by

adding the extra step of driving to Mountain Vista for the start of patrols, if the spring trail is not available for them.

- ii. Impacts to NPS Kennels** – Although NPS acknowledges some impacts to NPS Kennel operations, we feel that the discussion is insufficient. Any visitor programming at the Park Kennels that involves dog demonstrations could take away from Wilderness patrols. Without additional funding and kennel expansion, there are not enough dogs or staff at the Park Kennel to allow them to continue their legitimate operations and also provide increased visitor services.
- iii. Impacts on day and overnight users during very cold weather - Because** plug-ins will not be available at Mountain Vista (and we think it is appropriate for them not to be available), some long-term users may have to park at MSLC or Headquarters in order to keep their cars serviceable, then get a ride to the rest stop for their backcountry activities. This impact could be addressed by providing a shuttle van or service from MSLC, but such an alternative is not discussed in the EA.

c. Impacts to existing infrastructure at the park entrance are absent from the EA.

While the Murie Science and Learning Center has been an adequate winter visitor center, the effects of increased motorized access and use of that facility have not been analyzed in the EA.

d. Impacts to safety of both private and commercial users need further analysis

- i. Specific hazards associated with parts of the road** – The EA, while it opens up the park road to private users, fails to discuss specific hazards to which they will be exposed. Judging from the visitation lists for winter included in the EA, there are a number of drivers who bypass the MSLC into the park. The EA should be more precise on how drivers will be educated for winter travel on specific areas of the road that are subject to ice or drifting snow. This road has no guard rails and none should be advocated.
- ii. Problems with parking at Mt. Vista for overnight or long day trips** – We have pointed out in other parts of this comment that development of Mountain Vista Rest Stop beyond its present conditions is not consistent with prior NPS planning for rest stops and violates NPS Management Policies. However, users will pressure NPS to go outside its own management philosophy to gear-up this rest stop with plug-ins so that their vehicles will start after a long day or overnight trip. We urge NPS to resist this pressure and maintain Mountain Vista as a cold parking lot. A viable solution - institute a shuttle service from the MSLC or Kennels.

e. Soundscape

- i.** Although the EA does analyze soundscape impacts, it is significant that all of the action alternatives have negative long-term impacts to the natural soundscape. We urge NPS to eliminate Alternative 2 from consideration based on the analysis that long term impacts from this alternative would be moderate, rather than mild.
- ii.** The EA does not indicate whether or not NPS will monitor sound more closely during the 3-5 year “test period” for Alternative 4. We’d like to suggest that such monitoring be conducted, although we are aware that it will take resources away from the already tightly-scheduled soundscape monitoring program. The sound standards for the area of interest in this EA are among the most stringent in the park, largely because of the Wilderness designation of lands immediately adjacent to the park road from Mile 3 on. These soundscape standards have been extremely difficult to maintain in the summer, when aircraft and buses are more numerous. It

would represent a real loss to park resources if early plowing of the park road were to lead to impairment of soundscape standards here in winter, the only time of the year when they are likely to be met.

IV. DCC has its own suggestions for more viable alternatives under V. However we offer the following suggestions in the event that NPS chooses an existing action alternative.

Any selected alternative must include stringent protections to ensure that impacts are fully understood before any action is taken. DCC prefers Alternative 4 over other action alternatives, but for any action alternative we request the following mitigations:

- a. A Trial Period of 3 – 5 years** should be mandatory for any action alternative, with phasing used to ensure minimal impacts. We suggest a period of preparation and monitoring two years prior to full implementation. Once commercial operations are in place, more pressure will be put on the park to keep the road open, even if the Spring Trial proves to be impassable to non-motorized users because of trail conditions or resource impacts that may arise. By not entering into a commercial agreement for a period of two winter seasons, NPS would be able to evaluate whether it is feasible to guarantee that the park road could be maintained with an earlier opening date with enough consistency to satisfy commercial tour groups. This delay would actually provide benefits to the commercial tour industry by providing assurances that winter park road access can be consistently provided, and by allowing them additional time to plan and prepare for winter commercial operations, and to advertise to their customer base. We propose the following schedule:
 - i.** Winter 1: Spring Trail improvements done in early winter before snow is sufficient for recreationists to use the Spring Trail. Assessment of the usability of the Spring Trail for skiing and dog mushing would be done in cooperation with the Park Kennels. If ice conditions and snow levels are sufficient to allow for safe passage, winter plowing could begin on February 15. If resource impacts are identified, or if conditions do not allow for safe passage, no plowing would begin until the existing scheduled time (after March 1). No commercial uses would be authorized until after two seasons demonstrate that the Spring Trail is a viable option. Private vehicle use would be allowed once the road is opened.
 - ii.** Winter 2: Assessment of the usability of the Spring Trail for skiing and dog mushing would be done in cooperation with the Park Kennels. If ice conditions and snow levels are sufficient to allow for safe passage, winter plowing could begin on February 15. If resource impacts are identified, or if conditions do not allow for safe passage, no plowing would begin until the existing scheduled time (after March 1). No commercial uses would be authorized until after two seasons demonstrate that the Spring Trail is a viable option. Private vehicle use would be allowed once the Road is opened.
 - iii.** Winter 3: Assessment of the usability of the Spring Trail for skiing and dog mushing would be done in cooperation with the Park Kennels. If ice conditions and snow levels are sufficient to allow for safe passage, winter plowing could begin on February 15. If resource impacts are identified, or if conditions do not allow for safe passage, no plowing would begin until the existing scheduled time (after March 1). Commercial use would be allowed on a trial basis, with no contracts issued outside of the experimental period (which could include up to two more seasons as proposed in Alternative 4).

- b. A Financial Feasibility Study** should be a required action common to all action alternatives and should be available for stakeholder review and comment. NPS should state clearly that no other park operations would suffer funding cuts because of winter plowing activities.
- c. A Monitoring Plan** should be developed and implemented to track resource conditions prior to implementing any action alternative. NPS should report on the results of monitoring prior to any permanent decision to continue winter plowing. This Monitoring Plan should be available for stakeholder review and comment. Standards should be set prior to monitoring so that the potential for continued incremental changes without full evaluation is minimized. Park staff (particularly the Wilderness Coordinator and Resource Specialist, biologists, social and sound scientists, and Kennel staff) should be consulted in developing monitoring parameters. Monitoring should include (but should not be limited to):
- i.** Moose population dynamics and use of the Spring Trail corridor during calving and rutting seasons. It should be easy to use existing data on use of this area by moose, and to monitor and assess whether patterns of use change when this plan is implemented.
 - ii.** GPS data on front-country wolves. NPS has collared members of several different groups of wolves that primarily use the front-country areas east of the Savage River. This historic GPS data could be compared with current data to see if patterns of use change when this plan is implemented.
 - iii.** Continued use of counters (and other methods that may be developed in the future) on the Park Road and Spring Trail to compare numbers and provide use details to incorporate in the Financial Feasibility Study and other monitoring. Visitor and commercial use patterns should be monitored and linked to resource condition monitoring (in addition to the monitoring of wilderness impacts mentioned in the Minimum Requirements Decision (page 77)).
 - iv.** Winter users should be surveyed before the Trial Period begins, and upon conclusion of the Trial Period before any permanent decisions are made to continue winter plowing. This survey should characterize winter use and users in a way that is comparable to the detailed characterization the park has produced of summer visitors (i.e. Visitor Services Program Survey, the survey on social norms about soundscapes, and the recent survey of spring season activity preferences). We also suggest monitoring factors that can impact the quality of wilderness experience, (such as opportunities for solitude), or that can impact winter visitor experiences (such as trail conditions, ease of access, and safety).
- d.** Any plan must consider a back-up plan if Jenny Creek den site is utilized again (as judged by activity near this historic den site in late February and early March and in consultation with park biologists), or when the Spring Trail is impassable.

V. DCC – two suggested alternatives

DCC offers two possible alternatives, the first a No Action Alternative, with suggestions on how to enhance NPS' already robust program of providing winter visitor opportunities without additional motorized access. The second alternative incorporates much of Alternative 4, but not as a first step, instead as the only viable alternative for increased motorized access at Denali National Park.

a. No Action, until NPS analyzes the full range of impacts as suggested above.

- i. After analysis of impacts, consider re-introducing the EA, but we suggest that NPS remove Alternative 2 from consideration.
- ii. Enhanced activities in the entrance area can be provided at any time while NPS corrects deficiencies in the EA. A partial list follows.
 1. Begin to offer twice weekly dog demonstrations at some point after Winterfest, at times when the dogs are not on patrol. We understand that additional staffing for this may not make it an economically feasible option, but it should be considered.
 2. Groom unused loops at Riley Creek Campground for skiing. Consider grooming other trails in the entrance area for skiing.
 3. Conduct changes to the Spring Trail authorized in the 2002 EA. Conduct a study for a few years to determine how viable as an access alternative this trail actually is and for what months out of the winter it is reliably available. If further changes above the 2002 EA may be suggested, consider them before considering a road opening.
 4. NPS could consider offering CUAs for commercial motorized access to Mt. Vista for the period March 20th (the date the road is cleared currently) until early May, or until the summer concessioner begins activities. At the same time, NPS could offer a contract for a shuttle van from MSLC to Mt. Vista and back two to three times a day, with the summer concessioner having favored status to apply. This approach provides 1 ½ - 2 additional months of access to mountain viewing and backcountry traveling in the same area covered by the EA without actually changing the current situation. Increased commercial access would require monitoring for impacts, as already detailed above.
 5. Consider working with the state to encourage development of a scenic viewpoint near Cantwell. The state can provide further viewing opportunities by opening the Denali overlook near the Chulitna River sooner in the spring. And, of course, there will eventually be a world-class interpretive center at the South Denali Visitor Center site near Chulitna.

b. Open road on Feb 15th (Alt 4) to motorized access, with no plan to expand service further.

DCC is uncomfortable endorsing Alternative 4 as currently configured. We do not see this as a “starting point” for increased motorized access into Denali. We see it as the only viable option to meet the goals of the EA, keeping in mind that motorized access to the first 12 miles of the park road is currently available from mid-March to late September, nearly seven months out of a twelve-month year. In considering the very real impacts and the very real cost of an earlier opening, we cannot conclude that any further increase of motorized access is warranted. Other aspects of DCC's alternative (b.) follow.

- i. **Conduct studies to measure for possible impairment** and consider shutting down plowing if impairment occurs. These studies could include wildlife monitoring, soundscape monitoring and visitor experience interviewing, in addition to financial analysis. Such studies are discussed above under point IV.

- ii. **Do not implement this alternative until Spring Trail is re-configured and shown to be a viable alternative access for non-motorized users.**
- iii. **Commit to a cold, quiet rest stop by eliminating consideration of plug-ins, a warming hut, or an emergency radio at Mountain Vista.** Such a commitment meets the spirit of NPS Management Policies and planning intent for Denali.
- iv. **Provide a shuttle service (could have a user fee) from MSLC to Mountain Vista after the road is open** - Such a service will ensure that overnight and day-long backcountry users have convenient access.
- v. **Have a standard for interpretation** – as we have said before, summer bus drivers at Denali are required to have extensive interpretive training, in order to provide an accurate and thorough introduction to the park. Any commercial driver who will drive the Denali Park road must have such training as a condition of employment. The summer concessioner and the park service can provide cooperative guidance to any new commercial users during the period of this authorization.
- vi. **Think through the commercial implications** – we are concerned that NPS might unintentionally open the entrance area of Denali National Park to multiple commercial transportation operators during the shoulder season or even the summer, once they have a toe-hold in winter. NPS must be very careful in offering new CUAs for transportation in Denali to stipulate start and end dates and limitations for such activities, in addition to ensuring standards of interpretation as above.
- vii. **Driver safety and** emergency preparedness must be stringent, and could rule out vehicles of a certain size, and would mandate individualized training, on-site preferably.
- viii. **This alternative would include all the activity enhancements of “No Action –enhanced activities in the entrance area” under (a.) above.**

As stated before, we value Denali National Park and Preserve and the unique visitor experience for which it is rightly well-known. NPS must fully analyze comments made on this Draft EA in its final decision. We have noticed that recent NEPA documents have lumped comments into generic categories or statements, as is done with scoping comments here in this Draft EA. We would like NPS to attach a full summary of comments and the NPS response to comments in the Final EA. We also would like to see a more thorough description of comments made during the scoping period, as the statements included on page 9 of this EA are inadequate to determine the full range of alternatives and comments presented during the scoping period. As always, we appreciate the work you do and the opportunity you have provided for public comment on park plans.

Sincerely,

/s/ Nancy Bale

Barbara Brease

Hannah Ragland

DCC Board of Directors

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