

Denali Citizens Council



*Advocating for Denali's Wilderness, Wildlife and Way of life.*

June 7, 2013

PO Box 78,  
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907-683-3396

Don Striker, Superintendent  
Denali National Park and Preserve  
P.O. Box 9  
Denali Park, AK 99755

RE: Telecommunications and Climate Monitoring EA  
*Comments also submitted electronically via PEPC*

Dear Superintendent Striker,

Members of the Denali Citizens Council have reviewed the Environmental Assessment for Telecommunications and Climate Monitoring Improvements EA, along with the accompanying minimum requirements finding, and offer the following comments and suggestions. We have three major points:

1) The EA seems completely oblivious to the Backcountry Management Plan (BCMP) indicators and standards that seem most relevant to this project, including those for Evidence of Modern Human Use and Natural Sound Disturbance. There is no data presented to show whether these standards are being achieved, and indeed, NPS has never reported on most of the indicators in the BCMP, seven years after its completion. If NPS is serious about utilizing the indicators and standards framework, it should hold off on implementing this project until it has made the appropriate measurements and can report them in a compliance document.

2) The reasons given for the communication enhancements do not seem to apply as well to Eielson Visitor Center as other locations, and neither option for relocating the wireless site seems particularly desirable. This site should just be removed.

3) The EA does not discuss or commit to ways that the weather stations or communications sites could be serviced by non-motorized means in either summer or winter. We would like to see a commitment by NPS to perform regular visits by non-motorized means when possible, and to commit to no net increase in aircraft activity as a result of this project.

We will now address each of these points in more detail.

*Board of Directors*

*Nancy Bale*

*Barbara Brease*

*Nan Eagleson*

*Charlie Loeb*

*Brian Napier*

*Hannah Ragland*

*Erica Watson*

**1) The Environmental Assessment fails to acknowledge Backcountry Management Plan indicators and standards and does not evaluate impacts related to the standards, and therefore the project should be put on hold until such an evaluation is completed and NPS can demonstrate that standards will be met.**

The indicators and standards in the 2006 Backcountry Management Plan were meant to serve as proxies for various aspects of wilderness values as expressed in the Wilderness Act. While this EA provides the requisite minimum requirement analysis and provides some narrative analysis of the impacts to the wilderness resource, it fails to consider this most basic issue. In particular, we are concerned about the standard related to Evidence of Modern Human Use – which was intended to address exactly this kind of project – and to the Natural Sound Disturbance standards. Are these standards being met in the areas where the proposed sites are to be installed and maintained? How will this project impact NPS’s ability to achieve these standards? The EA does not even mention them, even though some relevant data on the soundscape standards exists and could be included in the document.

We are not necessarily surprised, as the failure to address these standards points to a larger issue, which is that NPS has not provided a coherent report on BCMP indicators and standards even once in the 7 years since the plan was completed. Why is that? Did NPS never intend to take the BCMP seriously? The public was promised that these indicators and standards would provide important guidance for when management needs to step in and regulate use more carefully, in lieu of taking any real action at the time. But now management is proposing to increase its own use without any accountability to the standards at all. This is particularly disturbing given the vague reference on page 4 under Purpose and Need to the “expansion of this technology....” We are very wary of incremental changes that compromise park purposes, as they often have at Denali. We are also discouraged by what this lack of commitment to monitoring means for implementation of the Vehicle Management Plan – one of our major concerns during that process.

DCC is not necessarily opposed to the placement of weather stations and communications equipment that are clearly consistent with wilderness management and purposes, as these projects seem to be. However, we do not see how NPS can move forward until it assures compatibility of the project with its basic management plan. The public invested its time and energy in the BCMP planning process in good faith; we expect the agency to show similar good faith in implementing the plan.

**2) Eliminate the Herning Cabin transmitter site instead of moving it.**

The EA makes a good case for the communication sites and weather stations proposed, except for the one at the Herning Cabin. This site apparently only provides wireless Internet to Eielson Visitor Center. We understand the changes in

communications that make it important to have the wireless system reach Toklat and Wonder Lake, but these reasons do not seem to apply to Eielson. All employees but one who work at Eielson reside at Toklat, where they can have full access to the VOIP and Internet connections they need for both work and personal reasons. Park radios provide for essential communication. Public education – which we do not believe is a sufficient reason for installing equipment in designated wilderness anyway – should be focused on the amazing environment around Eielson, not on content piped in electronically. The residual need at Eielson seems very small, and not worth the impacts to wilderness resources of placing a communications site on the tundra bench or the mountain top. There is not a case made in the EA for why wireless is so important at this site.

We would like to see this transmitter site removed. If it is to be retained, we prefer the VABM Muldrow location as described in Alternative 2. The EA voices uncertainty about whether the equipment could be completely hidden from Eielson Visitor or the road in Alternative 3, and certainly it would be much more likely to be encountered by hikers (thus impacting the Evidence of Modern Human Use standard). We believe the VABM Muldrow site would be less obvious, unless NPS can make more definitive statements about its ability to hide the equipment on the tundra bench below Mount Eielson. We do worry about the amount of aircraft noise already at Muldrow versus the Mount Eielson area, but since the EA presents no information about whether standards are being met in these areas, we have no basis for comparison.

### **3) Commit to non-motorized means of servicing the equipment and no net increase of administrative aircraft traffic**

We are surprised that NPS does not explore the possibility of servicing these weather stations and communication sites using non-motorized means. Particularly in areas where soundscape standards are not being achieved, it seems that it would be worth finding alternatives to helicopters for regular visits. For some sites practicality may intervene – Double Mountain is difficult to ascend even without carrying maintenance equipment. But for a weather station north of the Old Park boundary, why not suggest that it could be visited by dog team in the winter rather than by helicopter? Such action would help NPS achieve the goal of protecting the superlative wilderness values of Denali, and achieve the standards that are meant to embody those values.

The DCC board member who sits on the Denali Aircraft Overflights Advisory Council tells us that NPS has committed to reducing its airborne footprint in the backcountry. How can the adding of flight operations proposed by this EA be justified in light of that commitment? Can the NPS specify other flight operations it will decrease in return?

## A Final Note

The implementation of NEPA in this document falls short of the ideal in its presentation of alternatives. With the exception of locations for moving the Hering Cabin wireless site, there are not alternatives presented here. The public is being given an up-or-down choice, with no ability to consider other options in between, or other locations for communication sites or weather stations that might be less intrusive. While we understand that engineering or scientific considerations are driving placement, we find it difficult to believe there is only a single solution that works, and that all components are required in that solution.

None of this is to say we are opposed to the overall objective of the project. We support the gathering of scientific data and providing modern communications where essential for management to function. However, we strongly believe NPS needs to follow its management plans and give the public real choices in its NEPA documents.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Loeb", written in a cursive style.

Charlie Loeb  
Board President, on behalf of the DCC Board of Directors