

Denali Citizens Council



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

May 5, 2014

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Superintendent, Denali National Park
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Dear Superintendent Striker,

On behalf of the board and over 300 members of Denali Citizens Council, thank you for the opportunity to comment regarding the EA for a Climate Station, to be sited west of the Wonder Lake Campground.

DCC generally supports the preferred alternative, siting a USCRN climate station in the location specified close to an existing road and within the Wilderness exclusion near Wonder Lake campground. The small amount of disturbance planned, 25X25 ft., and the overall, long-term benefit to science, all these are reasonable defenses of this project. The benefit of removing the higher profile RAWS weather station currently sited next to the Wonder Lake Ranger Station, once this project is up and running, is notable. The new station is meant to provide data that will supplement data gathering throughout the US and will be deployed for an anticipated 50 year horizon.

Given our general support for this venture, we ask that NPS consider a few concerns:

1. The location of any *permanent installation* so close to designated Wilderness is not a best practice, in our opinion. Although the actual location of this installation will be in a Wilderness exclusion area, such areas in Denali were given fairly narrow and specific purposes in park planning documents. Such areas, called "Development Zones," were described in the Entrance Area and Road Corridor Plan of 1997. The Wonder Lake exclusion in this area, as a D-2 development subzone, was intended for campgrounds, rest areas, trailheads, utility corridors, gravel acquisition, and parking. A scientific station does not actually relate to visitor services and therefore fails to qualify as an identified use for such a subzone. Perhaps this seems a quibble, as there are already weather stations in several other locations at Denali (although most if not all are either associated with a larger visitor center or are out of the wilderness core park). The establishment of a *virtually permanent installation* in an area and for a purpose not strictly intended is a move away from planning intent.
2. Science is, as the EA states, a purpose enumerated in ANILCA. However, we suggest that science should be conducted in or near Wilderness with a light touch (examples would include temporary stations and personal observational

science, deploying permanent equipment only in the development footprint of larger visitor centers). Ideally, permanent scientific monitoring stations should be outside the core 2 million acres of Wilderness park. In the case of this station, the data will be useful for purposes of long term monitoring of climate change. However, such data collection is not providing information directly relevant to Denali's legislated purpose. Again, this project is relatively benign and certainly defensible. However, it is DCC's opinion that hard questions about its relevance and appropriateness in a Wilderness park should always be posed when a project will disturb natural resources.

3. We were relieved to hear that this station was not anticipated to create additional impact on park road traffic, with three trips per summer expected to be the maximum needed to service the station. We know NPS will make a commitment to train and use existing Wonder Lake staff to perform these duties, when necessary, to reduce the need for staff to travel from headquarters to the site.
4. DCC asks that the instrument tower and other upright structures of this site, if constructed, be camouflaged using paint or other coloring to prevent direct reflection and reduce the chance of its being visible from a distance. We appreciate that it will be designed to fit in a small space with a low profile.

As always, we appreciate the opportunity to provide comments.

Thank you,

/s/ Nancy Bale
DCC Director