

March 27, 2006

RE: Savage River Rest Stop EA
Dear Superintendent Anderson,

On behalf of the Board of Directors, staff and members of Denali Citizens Council (DCC), I am happy to present these comments on the EA for a Savage River Area Rest Stop. As a local park advocacy organization, many of whose members live in the gateway communities of Denali National Park and work in the park in summer, we have a strong, ongoing interest in maintaining the natural integrity of Denali National Park and Preserve and the special character of public lands that surround this park.

This EA proposes to implement general direction provided in the Denali Frontcountry Plan of 1997. It is now 2006. The Rest Stop advocated by NPS in its Preferred Alternative is not scheduled to be constructed until 2008, a long ten years since publication of the Frontcountry Plan. The general direction of this plan remains in force, and yet times have changed. Visitation in the park, as you point out, has increased and was at record levels in 2004 at 404,000 visitors. There is little reason to suppose that this number is the highest that you will see, since hotel construction continues at Denali's gateway.

Business Plan Predictions

The original Frontcountry Plan contained little quantitative analysis of the scale and scope of future visitation to Denali. However, an NPS Business Plan completed in 2001 predicted a continuing steep rise in tourism with a doubling of visitation every 12 years. After the year 2001 there was a decline in visitation over the next two years, but the situation appears to be rebounding now. The Business Plan reiterated the several strategies that had been developed in the Frontcountry Plan to attempt to deal with future visitation at Denali-

- enhanced infrastructure at the entrance to the park, including the Murie Science and Learning Center a new Visitor Center, ANHA Bookstore, Food Court, increased trails in that area, all of which are now in place,
- some enhancement of infrastructure along the first 154 miles of park road, including a Rest Area at Savage River (now built), new trails (this plan is not discussed broadly in the EA), interpretive programs at Savage Cabin, and
- some sort of rest stop development near Savage that would provide additional opportunities for folks to park and get out of their vehicles to enjoy the park (THIS EA). The location of this proposed Rest Stop appears, in the EIS, to be closer to that proposed in Alternative 3 of this EA. In fact, it appears that NPS has tweaked the boundaries of the development zone a bit in order to accommodate the preferred alternative 2.

DCC Board and Staff

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However, the NPS Business Plan was not optimistic regarding the capacity of Denali for all future visitation and predicted that South Denali development would be required to absorb additional impacts. This proposed diversion of business to the south side does not appear to have been noticed by hotel builders and large package tour providers, who continue to expand the room market in the Nenana Canyon and McKinley village areas, putting additional pressure on all facets of visitor accommodation not only in Denali's entrance, but along the entire Park Road, in Kantishna and in the communities outside the gateway to the park.

Overall Vision for First 15 miles must be Clearly Stated

Given the large increases in visitation and hotel building since 1997, it is legitimate to ask, "What is the NPS' overall vision for the first 15 miles of the Denali Park Road, in 2006?" Granted, this is an implementation EA, but significant enough changes have occurred since the 1997 plan. Now more than ever it is necessary for NPS to indicate how this Rest Stop will carry out the mandates of the EIS without ministering to trends that will ultimately damage park resources.

Many of DCC's members have a long history of involvement at Denali. From our experience there are several elements to the vision for the first 15 miles of the Denali Park Road. Here are some possibilities:

1. The first 15 mile section of the Denali Park Road, up to the Savage River checkpoint, is unique in providing opportunities for private cars to drive the road, view wildlife and stop to hike, take pictures, and enjoy the backcountry. This attribute should be preserved as the most important value for this area.
2. The first 15 miles of the Denali Park Road, up to the Savage River checkpoint, is highly accessible for day trips into the backcountry and should provide a variety of hiking opportunities for independent and bus travelers through construction of a trail system. Because visitation in this area is expected to be rather larger than in other parts of the park, the building of trails in a park with a "no trails" policy is justified.
3. The first 15 miles of the Denali Park Road, up to the Savage River checkpoint, because it is not subject to vehicle limitations established in park regulation at 10,512, is an ideal place in which to attempt to handle increased numbers of package tour guests through group tours and experiences more closely tied to a bus, with only minimal excursion into the backcountry.

Our question is simply this: "Given increases in visitation and demand for entry into Denali, can all three of the visions articulated above be maintained and encouraged?" We urge NPS to answer this question now, and indicate which vision this new rest stop is most likely to serve and why.

Although we see no reason to oppose the construction of a new Rest Stop, this EA falls short in addressing the real changes in visitor numbers, the real increases in package tour percentage of the visitation, and the real threat of negative impact to park resources if the predictions of the NPS Business Plan prove true. The Frontcountry EIS pledged to initiate a VERP process for steering the course of future development, including even those projects mandated by the EIS. This EA should demonstrate the application of VERP to show that activities along this section of the Park Road are not dangerously trending toward damage to park resources.

Ultimately, the application of limits is legitimate and necessary even in this most busy section of the park road. For park planners to indicate that frontcountry area services will allow "as many visitors as possible"

to experience these resources without degrading them introduces a trend that is likely to end in overuse of the frontcountry area. This mandate to serve as many as possible in the entrance area can and will result in conflicts between the three elements of the Vision expressed above. Is the preferred alternative Rest Stop going to become a stop on another “short tour” targeted to package tour passengers? Is NPS considering the eventual end of private car use on this section in its internal discussions? The EA must address these eventualities under Tourism or Socio Economic impacts. Without this consideration, the EA is incomplete.

Our detailed suggestions

Below are our suggestions regarding deficiencies in this EA and ways to correct them:

1. Purpose and Need is too general:

- The Purpose and Need section states that people now stop frequently along the park road to view wildlife. It does not indicate how a new Rest Stop will prevent this stopping. If there is something to see, folks will stop, and will not wait for the Rest Stop.
- EA should quantify visitor numbers for experiences between headquarters and Savage. To say that current parking places are inadequate without data backup may be true, but how do we know?
- EA should indicate how NPS has already used VERP to determine the impacts of current activities.
- EA should state a clear vision for first 15 miles of park road in P and N. (DCC argues that this vision must address needs of independent guests and shuttle bus riders as legitimate and that they must continue to be served by activities in the frontcountry). This would not be a restatement of the DCP/EIS, but a needed update, considering the changes that have occurred since 1997.

2. The EA does not present a disparate range of alternatives:

This EA does not present a range of alternatives. There is very little if anything (other than appearing to be near where it was mandated in the DCP/EIS) that makes Alternative 3 a viable alternative. Yet, a scoping alternative that advocated dispersed sites for a rest stop along the park road was dropped. There are several positives about this dispersed alternative, and it more clearly presents an actual choice to a destination style Rest Stop. It could be argued that dispersed sites do a better job of protecting all the above visions for the first 15 miles of the park road than the preferred alternative.

3. The EA does not address the creation of a “little city” at Savage:

- The EA does not quantify the possible numbers of people who could be located in a relatively small area, if the Rest Stop, Savage Cabin area and Campground all have visitors.
- With 33 spaces and three group campgrounds, Savage Campground has the potential for 150 folks in one night. The rest stop could cycle through hundreds of folks per day, as does the Savage Cabin. If 100 + people are getting out and experiencing the park in this tight area, there will be impairment from social trail formation without close monitoring and well marked, well planned trails.
- The EA should indicate how NPS will use VERP continuously to determine when crowding and overuse are impairing physical resources and/or visitor experiences, and what NPS will do in that case.

4. This EA is incomplete without an accompanying Trails Plan for Savage area

Several trails, including a loop trail and an Alpine Trail were planned to interface with this Rest Stop. The number and location of trails to the Rest Stop, Campground, Savage Cabin, and Shuttle Bus stops will influence whether or not this project causes impairment. The EA and Trail Plan are needed together, and should be completed simultaneously. In addition, trails should be finished before the Rest Stop opens. The FONSI should express a commitment on the part of the NPS to make this happen.

5. Detailed remarks on the Preferred Alternative and Actions Common

- The EA should mention the likelihood that a left turn lane will be required on the Park Road, for access to the Preferred Alternative.
- The EA should advocate for signage and physical barriers that direct people to trail-only hiking out of the Campground and out of this Rest Stop.
- Problems with picnicking and bears could occur if this activity is encouraged at the Rest Stop. NPS mentions little about eating at this Rest Stop. How many picnic tables will there be? Bear proof containers? How often will there be trash pickup? Will trails be maintained trash free daily?
- Interpretive displays may be helpful from a cultural standpoint, but should be held to the minimum. After all, this Rest Stop is where folks are supposed to get out of their cars and experience the park. If the loop trail has cultural interpretation as its focus, it should not have any additional signage---all signage must be confined to the Rest Stop itself.
- Visual clearing – This activity, to enhance views by cutting vegetation, may be acceptable along the Park Road, where the Road itself encourages brush growth. Visual clearing of brush or trees at the Rest Stop is a highly questionable activity in a National Park.
- We support the removal of temporary toilets at Savage Cabin and their replacement with SSTs.
- In the past DCC has not supported an eight foot wide shoulder along the Park Road from headquarters to Savage. This expected upgrade is mentioned several times in this EA. Because of the variety of traffic and requirement for safe pullouts, perhaps a wide shoulder is acceptable, but only in certain locations. It will be a visual distraction for hikers enjoying the trails, and is not necessary along the entire 15 miles. The wide shoulder will encourage speeding, not something that NPS should in any way be encouraging. The FONSI should mandate that a “road shoulder working group” go over those sections of the first fifteen miles, especially in the higher areas where the road is more visible, and identify sections where the safety gained by a wide shoulder outweighs the aesthetic losses. NPS should then commit to building the wide shoulders only at those locations. We support the speed limits now in effect.

6. EA must do more to specify the financial inputs and sources for operating this pullout.

- DCC asks NPS to reconsider maintenance costs for this Rest Stop. Given the real possibility of physical impairments with three major concentrations of guests existing within a mile of one another, the new Rest Stop should be monitored by a full time employee for trash pickup and cleanliness, and ranger staff must be available throughout the day for monitoring trails, wildlife interactions, and soundscape. Selected wetter sections along trails require close

monitoring. Certainly the figure quoted in the EA for costs once built is not adequate to cover this level of maintenance and monitoring.

- We understand that, in order to build and operate the full plate of infrastructure required to implement the DCP/EIS, NPS has had to solicit fees or financial inputs from private groups and nonprofits, including Doyon/Aramark and the Alaska Railroad. We ask that the FONSI analyze the financial needs and expected inputs for a 15 year operating window, and specify from whom NPS is intending to solicit funds. It would seem that partnering with large tourism entities for building and operating infrastructure will tend to front load the types of uses that occur. We understand that although Denali is a public park, public funds are in short supply, and we do not oppose the concept of partnering per se. We urge NPS to move carefully within this arena, however, in order to protect the independent visitor experience.

Thank you again for accepting public comment.

Sincerely,

A handwritten signature in black ink that reads "Nancy Bale". The signature is written in a cursive, flowing style.

Nancy Bale
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