

Department of Natural Resources
550 West 7th Avenue, Suite 1050
Anchorage, AK 99501-3579

August 31, 2012

RE: Yukon Tanana Area Plan

To DNR YTAP Planners,

Please accept these comments on behalf of the Board of Directors of the Denali Citizens Council (DCC). DCC is a grassroots, non-profit organization that is focused on public land use issues in the greater Denali area, including federal, state, and locally managed lands. DCC has over 300 members, the majority of whom live in the area, work here seasonally, or own property. We have a particular interest in some state lands within the Denali Borough that are addressed in the Yukon Tanana Area Plan. We have a long history of activism around these lands, including hosting 3 summits over the past 8 years to discuss the future of the Stampede area (Wolf Townships) west of Healy, the most recent of which took place earlier this month. We also sponsored a community visioning and planning process for the Yanert valley, and have been very involved in educating the public about state processes for making decisions on municipal land entitlements and the licensing of natural gas exploration.

We are generally supportive of the draft Yukon Tanana Area Plan, but do have a few recommendations for changes prior to the final.

Stampede/Wolf Townships

- Recommend establishment of the Stampede State Recreation Area. Please include a recommendation to establish a Stampede State Recreation Area within the townships, following the proposal put forth by the Denali Borough in multiple resolutions and introduced into the last 3 state legislatures (map of the current proposed area is appended). The Wolf Townships have long been a source of controversy, but the volume of Borough resolutions and the multiple efforts by Borough representatives and state legislators representing the Denali Borough (Rep. David Guttenberg and Senator Joe Thomas) demonstrate that this is a serious endeavor that has already had much scrutiny. Among the reasons that this Recreation Area designation is important are the following:
 - Enclosed on three sides by Denali National Park and accessible via the Stampede Road and ATV trails, the area has been experiencing an increase in spill-over tourism which – when combined with long-time Alaskan user groups such as hunters, berry pickers, etc. – is producing user conflicts and problems of overuse such as trash, human waste, and trail degradation and expansion. The famous “bus” popularized by the book and film “Into the Wild” draws visitors deep into the proposed Recreation Area, many of whom are unprepared and must be rescued.

DCC Board of Directors

Nancy Bale
Barbara Brease

Nan Eagleson
Charlie Loeb
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Hannah Ragland
Erica Watson
Jared Zimmerman

- Commercial enterprises marketing services to Denali National Park visitors have suddenly increased dramatically. Three new businesses offering ORV tours along the Stampede Trail have started in the past 8 years; two businesses offer tours on trails in the Dry Creek area. There are nascent conflicts among these businesses and between them and other user groups. We believe this is the tip of the iceberg, as national park visitors continue to look for add-on activities in the region, many of which cannot be offered within the national park. Stampede is the closest, most accessible public land for these activities to occur.
- After much discussion at the three Stampede Summits and at Borough meetings, it appears the Division of State Parks and Outdoor Recreation is the agency best equipped to address the issues identified in this area. This is the agency with experience in providing facilities for trash and human waste, for providing safety and other information to area visitors, and for managing recreational commercial uses. This is not a casual idea, but one that has been thoroughly discussed over 8 years.
- The Denali Borough is one of the most tourism-dependent communities in the state, and contains the most-visited tourist destination away from the coast (Denali National Park). Yet the Borough does not have a single state park or recreation area, despite an abundance of incredible state lands and the need to have camping and recreational options for Alaskans who may not want to go to the national park, but still want to enjoy the area. The Stampede State Recreation Area would be ideally situated to compliment the Denali Borough's other recreational opportunities, and would support the local economy.
- In all three Stampede Summits from 2004 to 2012, participants discussed the management options for the Wolf Townships. During the first two summits in 2004 and 2005, support for the recreation area concept crystallized. At the most recent summit, with over 60 people in attendance, the idea again received strong support. Among those participants who filled out evaluations at the conclusion of the Summit, 2/3 thought the Recreation Area was an appropriate solution for managing the Stampede lands, and the Borough Mayor, Representative Guttenberg, and Senator Thomas all reaffirmed their commitment and support for moving the SRA proposal forward.

Please contact the Borough for additional information as needed, including copies of the resolutions supporting the creation of the Stampede State Recreation Area. For many of us, this is the highest priority recommendation for YTAP.

- Recommend a step-down recreation management plan. We recognize that the establishment of a Recreation Area requires legislative action, and we also recognize that such action may take some years to accomplish. In advance of the legislation, we would like to see YTAP recommend completion of a step-down recreation management plan for the Stampede lands classified as Habitat (Ha) and Public Recreation – Dispersed (Rd). Such a plan would provide additional guidance to the Division of Mining, Land, and Water as it continues to make decisions and respond to problems in the Stampede area. Brandon McCutcheon showed us several such plans at the latest Stampede Summit, which seemed reasonable models to follow.

- Change designation for portions of P-88 and P-89. While we support most of the classifications in the Stampede/Wolf Townships area, we disagree with P-88 and P-89, parts of which should be classified as Habitat (Ha) and Public Recreation – Dispersed (Rd) similar to other lands in the area.
 - The detached western portion of P-88 is mostly tundra and unsuited for settlement. There is no obvious reason why this was deemed suitable for settlement.
 - The western two sections of P-89 are on the north slope of a ridge that is covered in mixed wet tundra and spruce, and are undesirable for settlement. ATV trails wind through boggy areas up to the ridge top, and the area is frequented by caribou and wolves that spill over from the national park (as is true of much of the rest of the Wolf Townships). We realize that this area was reclassified as Settlement in a prior action to provide potential replacement lands to the Alaska Mental Health Trust, but if AMHT does not acquire them we believe the lands should revert to Habitat (Ha) and Public Recreation – Dispersed (Rd). The Denali Borough has not selected these lands, to our knowledge.
 - The sections of P-88 adjacent to the eastern boundary of the Panguingue Creek subdivision should also revert to Habitat (Ha) and Public Recreation – Dispersed (Rd) if not conveyed to AMHT or the Denali Borough. Again, we are unaware of any Borough land selection in P-88.
- We support other designations in the Stampede area including P-80 through P-87 and P-93. If there are suggestions made to change the designation for any of these lands in the final Area Plan, we would appreciate the opportunity to respond.

Yanert River & Alaska Range

- We support the broad designation of the Yanert River valley as Water Resources (Wr) and Public Recreation – Dispersed (Rd) as specified in the draft plan. This designation captures the importance of this valley very well, and will guide protection of its resources for the future.
- Retain Unit P-60 in state ownership and change designation. Unit P-60 was mostly within subunit 4C2 of the Tanana Basin Area Plan, where it was designated for Public Recreation and Wildlife Habitat. We are uncertain as to why a General Use designation was selected in this new Area Plan. This area is very important and heavily used for recreation by local residents, and habitat values seem very high to those of us who live there. We recommend a designation of Habitat (Ha) and Public Recreation – Dispersed (Rd). Most importantly, however, is to indicate under Management Intent for this unit that it is to be retained in state ownership.

Nenana River

- Recommend the legislature designate the Nenana River as a State Recreation River. The Tanana Basin Area Plan made a compelling case for this designation, since the Nenana was then – and is even more so now – one of the most important recreational rivers in Alaska both for commercial guiding services and independent boaters. The focused management plan completed for recreational rivers would be beneficial for the Nenana. The Stampede State Recreation Area does remain our priority for a new legislatively designated area.
- We support designation of lands along the Nenana from Healy to Cantwell as Habitat (Ha) and Public Recreation – Dispersed (Rd), including units P-98, P-71, P-76, P-56, P-63, P-64 and P-65.

Kantishna East

In this area, DCC is particularly concerned about the wildlife habitat and movement corridors along the Toklat River. Our particular requests are as follows:

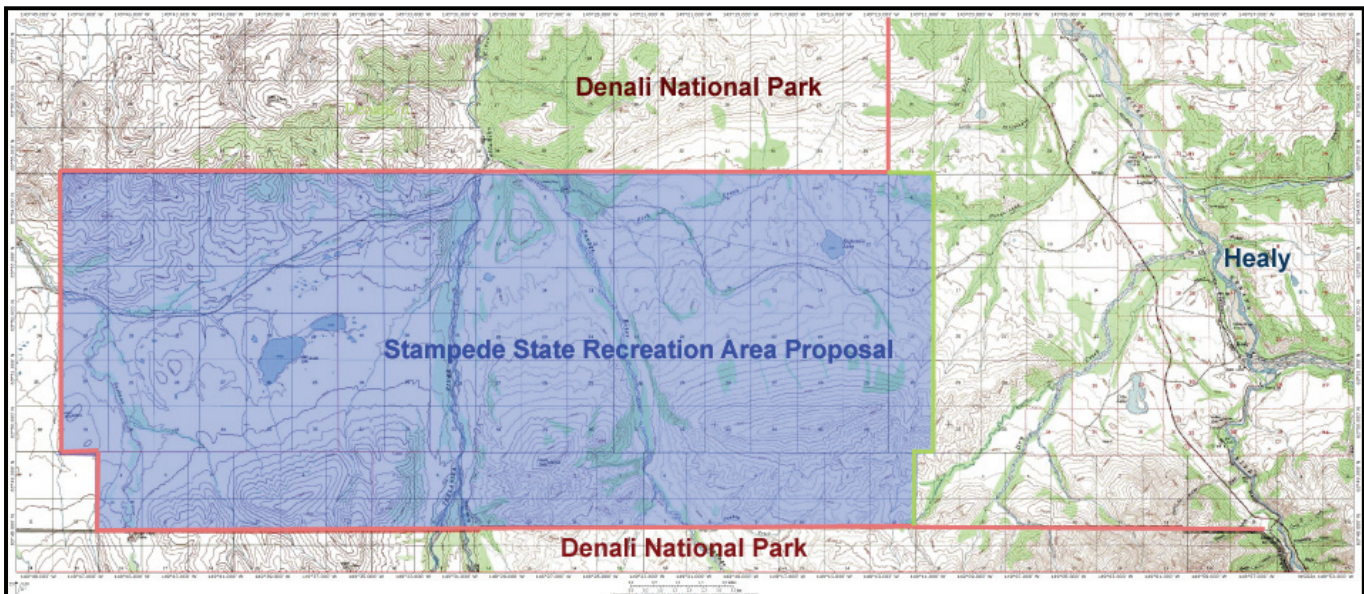
- Reduce the size of Unit K-69 identified as Settlement to exclude lands adjacent to the Toklat River. Removing the westernmost sections in this unit should not harm its settlement prospects, and would better serve the YTAP management intent that riverine areas be excluded from settlement. Wildlife habitat and ample wildlife corridors along the Toklat should be retained by reducing the size of the K-69 Settlement Unit in order to accommodate a wider Wildlife Habitat-Public Recreation buffer adjacent to the Toklat River. This portion of the Toklat River is especially important because of its nearness to the Toklat Springs, a critical wildlife area.
- For all of the General Use (Gu) state land around the Toklat and Sushana Rivers (Units K-62 and K-67) the plan should indicate that land is to be retained by the state, and specify that the Alaska Department of Fish and Game would be consulted about retaining sufficient wildlife corridors if any of the land is ever contemplated for development purposes.

Again, DCC is generally very supportive of the draft Yukon Tanana Area Plan. While our comments have focused on lands we believe are important for conservation, we do believe in thoughtful approaches to community and resource development, and we appreciate the careful consideration planners have given in the writing of this document.

Sincerely,

/s/ Charlie Loeb, Nancy Bale

for the Denali Citizens Council Board of Directors



Above is a map of the Stampede Recreation Area proposal considered by the Alaska State Legislature in its most recent session as HB 113 and SB 60. The proposal incorporates most of the contiguous units in this area that were designated by the Public Review Draft of the YTAP as Wildlife Habitat and Public Recreation-Dispersed. The planning intent of the YTAP for these units would best be served through creation of a State Recreation Area.