



Since 1974

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To: NARS Project Management Team and Consultants:

Board of Directors

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The Board and members of Denali Citizens Council appreciate this opportunity to provide comments during the scoping process for the North Access Reconnaissance Study. We are a local conservation advocacy organization, founded in 1974. We represent people who live and work in the Denali Borough and whose lives would be most intimately affected by a large new project. We also represent Alaskans and others who retain an interest in preserving the area's unique natural qualities. We have followed the entire legislative history and study process on North Access. Our suggestions are listed as a series of bullet points.

- **Consider Costs v. Benefits to the local community**

Analysis of feasibility for any large project in the Denali Borough must include a thorough breakdown of socioeconomic costs to the community. This was not done in the most recent feasibility study in 1997.

The "Background" section of the NARS Scoping meeting materials indicates that new park access offers the Borough "new economic opportunities, an expanded tax base, land entitlement, jobs and a more stable infrastructure." We urge the study team to take a hard look at this optimistic scenario. A recent study (Sept. 2001) of economic trends in the Denali Borough documented the cyclic affects of a tourism economy upon employment in the borough. This cyclic employment may do little to promote a year-round stable economy. In addition, the presence of summer-only infrastructure (large, empty hotels or strip type gift shop development) does little to promote a town centered, viable community feeling. And, while it is true that bed taxes from tourism provide a solid foundation for the borough economy, there is a point where the cost to the borough for providing services outweighs the benefit to the borough of increased revenue, especially if tourism cannot support a stable population.

For more information, see "The Denali Borough," in Alaska Economic Trends, September, 2001. Alaska Department of Labor and Workforce Development, 3-10.

- **Consider NPS Planning conflicts**

The National Park Service has not in the past nor does it now advocate a northern tourism route into Denali National Park. As pointed out in the 1997 Feasibility Study, the General Management Plan of 1986 would require an amendment in order for NPS policy to favor northern access. On page 32, the plan states,

The National Park Service continues to disagree with the state of Alaska about the economic justification for building another northern access road....A northern access route through the park would have severe environmental impacts. The Senate report to accompany HR 39 (ANILCA) says that "the prime resource for which the north addition is established is the critical range necessary to support populations of moose, wolf, and caribou as part of an integral ecosystem".....The lands are suitable for wilderness designation. The benefits to visitors of having expanded services in the northern portion of the park would not justify the ecological damage.

In 1991 the Denali Access Task Force, a panel of NPS superintendents from various parts of the country, was tasked with making recommendations for alternate access routes. Their final recommendations restated the conflict between park purposes and a new northern road, and they found no convincing argument for a new road to Kantishna.

At a recent Denali Borough meeting on December 11, 2002 park planner Mike Tranel reiterated the NPS preference for access development on the south side of the Alaska Range.

- **Kantishna is not an appropriate destination**

In view of the legal and environmental conflicts mentioned above, planning for access with Kantishna as a destination is unwarranted. The NARS must consider the more restrictive Park service management guidelines and compliance mandates for any route within the park. The wilderness suitability of most NPS lands in this area complicates the regulatory process.

Quality of visitor experience in Kantishna must be considered. We suggest that you contact the lodge owners in Kantishna for their assessment of the effects of a new project upon the quality of their visitors' experience.

Costs may be prohibitive. For an analysis of road building costs in the Kantishna area, see the NPS Draft EIS for Spruce Creek Access. Contact Bud Rice at the National Park Service for more information on cost analyses for roads and bridges in that area.

- **Feasibility was just studied in 1997. Numerous prior studies have been lukewarm**

Although figures would need to be updated, the *North Access Feasibility Study* of 1997, a cooperative project between the state of Alaska and the National Park Service, provided detailed estimates.

Why is this issue being submitted to new study after such a relatively short period of time? What data are missing from the 1997 report and what new data will be sought? Will the data from the 1997 study provide a foundation for the current study?

The written “Background” remarks at NARS scoping indicated that the 1997 Feasibility study “concluded both a road and railroad were feasible.” This represents an overly optimistic view of the conclusions of that study. In fact, on page v of the Executive Summary, the authors state

A more in-depth review is needed to determine whether a privately funded, privately operated railroad is economically feasible, although initial review shows economic feasibility is unlikely.

And, on page vii

Lower population densities, habitat differences, and seasonal use patterns combine to make the chances for seeing wildlife along a new north access less than on the existing park road.

And, on page viii

A decision to proceed with the consideration of a north access project could require 8 to 9 years and cost \$4 to \$6 million for NEPA compliance and environmental studies.

Do the state and federal government have enough political and financial commitment to study this issue for another decade, considering the slim likelihood of project completion? We understand that an additional \$1.8 million has been requested? For an EIS? For further reconnaissance?

No study to date in the list mentioned in the Scoping hearings has expressed overwhelming support for north access. The Denali Task Force report in 1994 was equivocal in their recommendations.

- **The Tanana Basin Area Plan recommends public ownership of Stampede**

The Stampede Trail (or Wolf Townships) area was designated by the State of Alaska’s Tanana Area Plan for primary use as recreation and habitat. No settlement was planned for this unit, and protection of recreation, fish and wildlife were given highest priority. Until HB 244, no lands were eligible for borough selection in these townships beyond what had already been selected in a few areas adjacent to the Parks Highway.

HB 244 allowed the borough to include 3500 acres along the KHI rail corridor as part of the borough entitlements. In so doing, the state legislature overrode state planning intent for the area.

- **Define the relationship between NARS and Kantishna holdings**

Kantishna Holdings, Inc. has a mandate for selection of a rail corridor in the Wolf townships under HB 244. The Alaska Department of Natural Resources has received authorization to assist in this project over the next few years. We are unsure that DNR has spent any of the allocated money under HB 244.

We are assuming that DNR's actions under HB 244 would be separate from those of the NARS team. How does the NARS team plan on maintaining appropriate communication with KHI while avoiding conflict of interest situations?

Denali Citizens Council believes that construction of a railway corridor in the Wolf (Stampede) Townships under HB 244 before analysis of feasibility and environmental impact would be premature. KHI has indicated in the past that it would provide money for an EIS for its project. How does this fit in with NARS?

- **Keep other North Access options open for study**

Healy to Kantishna appears to be the primary focus of the NARS. Is the NARS team prepared to look at other access options within the Denali Borough?

- **Carefully analyze "If we build it they will come" arguments**

Undeniably, there has been rapid growth in visitation to Denali and future increases can be projected. Tourism has been touted as Alaska's next resource base. The growth of cruise ship industry can create unlimited demand for Alaska's resources. We must begin to consider limits. Keeping the wilderness experience and the special character of Denali is and will be the most important consideration for future generations.

Sincerely,

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