



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

Saturday, October 31, 2015

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[www.denalicitizens.org](http://www.denalicitizens.org)

### **Board of Directors**

David Arnold  
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Michael Raffaeli  
Hannah Ragland  
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Chris, Adam and Clay,

On behalf of the Board of Denali Citizens Council (DCC) and our 300 members, I am writing to comment on the proposed Denali Borough DRAFT's classification categories and proposed classifications for different parcels. We appreciate the opportunity to weigh in on this important step by the Denali Borough, and commend the Borough on taking action to move forward. DCC believes, based on the most recent census data as well as concerns raised by community members, that the population of the Denali Borough is not growing quickly, but is showing signs of increasing conflicts related to seasonal changes, and impacts to necessary services and neighboring communities.

Current visitation to the State of Alaska and particularly the Denali Borough and Denali National Park & Preserve are up from the 2008 down turn, but not above pre-2008 levels. There are certainly housing constraints, especially during the summer season, due to the tourism industry, heavy construction on the George Parks Highway and the start up of the Healy 2 Power Plant by GVEA. However, DCC believes while there are the persistent issues of housing and demands for services, especially seasonally, that the biggest change to the Denali Borough hinges on the possible construction of one of two natural gas pipelines. A pipeline running through the borough would bring a whole host of new challenges to navigate for the Borough.

Regarding the proposed code revisions, DCC would like you to take the following actions:

- Revise and implement the Borough's decision matrix to guide land use decisions and roles and responsibilities of the Assembly, Planning Commission and Borough Staff prior to finalizing classification of specific parcels. For more information, please see the following section.
- Create an illustrated guide explaining the process of land management decisions to aid citizen understanding of timelines and procedures involved in land management decisions. This would also have the added benefit of explaining the differences between the four groups of classifications (i.e. Disposal, Disposal or Retention, Retention or Future Disposal, and Retention). As it is written, it is not clear how each of these groupings is different from the other, particular the second and third grouping.
- Clearly define enforcement in any plan, in order to not water down the purpose of Denali Borough as a land manager. Explain how the Borough will meet the demands of being a conscientious land manager, and how the Borough will ensure it has

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management capacity to administer these ordinances. The Borough has authority, according to existing code, to create covenants that could limit uses on land that the Borough disposes of. Who will be responsible for overseeing this task, and ensuring that covenants are followed?

- All development and new businesses, commercial use or settlement, will invariably bring with it increased demands on limited and ailing services and amenities. How will the borough use this plan or its other tools to dispose of or manage its lands for a sustainable Denali Borough future? The decisions matrix for land disposal or lease should include cost recovery for new demands on existing services and amenities or enhancements to services and amenities.
- Insertion of strong language and a commitment to protecting the rural lifestyle of residents, the vital tourism economy and both habitat and wildlife through wildlife corridor protection in any approved land management plan. Making these uses and values a necessary consideration in land management decisions will ensure that lands are evaluated completely and developed or disposed of wisely, while maintaining the character of the Denali Borough.
- Rename this document so that it less confusing to the public on whether or not this constitutes a land management plan. Our understanding is that it is not a management plan, but instead part of the process to guide where to begin developing management plans for specific parcels, to define classification categories, and to encourage residents to start thinking about specific parcels and how they should be classified.

Regarding classifications categories, and land management plans, DCC believes:

- These DRAFT documents are on the right track and it is admirable of the Denali Borough to get out ahead of future demands by having a plan and intent for land based on what are suitable uses.
- We appreciate that the tables in these documents have identified where management plans will be needed, but continue to be concerned about inconsistencies in existing Borough code on when a management plan is required. Current code (Chapter 4.25.020) states that the only requirement prior to “any action being taken that affects that land” is classification. While Chapter 4.10.020 states that a management plan would be created for “each parcel of borough land,” it is not stated that a management plan would be required prior to sale or permitting temporary uses, many of which could, and likely would affect the land (leasing does require a management plan and is covered in Chapter 4.10.050). While we support this process to define classification categories and start examining the details of specific parcels, we maintain that a land use management plan should be a required before any permitted uses on, leasing or sale of borough property, and should be part of adopted code prior to classifying specific parcels.

- Current code includes a classification for “existing material site” because many in the community felt that uses allowed in an area classified as heavy industrial were not appropriate in areas such as Panguingue B where material sites are located near residential areas.
- The classification categories “Reserve” and “Land Bank” are redundant, and could be combined under the “Land Bank” description. There are currently no lands with a proposed classification of “Reserve,” and if combined, we propose changing the language “in the near term” to “until alternative long-term uses are identified.” Any use of the terms short, near or long-term to describe the Borough’s intent for land should be clearly defined to eliminate confusion.

Regarding classification of specific parcels, DCC believes:

- While “Land Bank” indicates a preference towards retention, many of the lands in the Montana Creek parcel are suitable for “Amenity Value” given its scenic value and use as a wildlife corridor.
- The subareas 1, 3, and 4 of the Panguingue B parcel, as well as some of the western half of subarea 2 are suitable and necessary for wildlife corridors and green space and thus should be considered for “Amenity Value.”
- Due to the scenic value and the inhospitable nature of the Nenana Canyon, especially during the winter months, the Borough should move slowly with classifying subarea 3 as “Commercial,” and instead consider “Land Bank” or “Multiple Use,” which would leave commercial development possible, but not the only possible outcome. These lands are very windy, but also scenic. It is vital that the borough does not promote an expanded Nenana Canyon ghost town and instead seek to promote more year-round businesses to provide necessary services. These lands seem like tough sells for year-round commercial operations.
- We urge the Borough to carefully consider potential conflicts with increased commercial presence and settlement in the Yanert B parcel, and to consider “Land Bank” or “Multiple Use” classification for lands in this area until further studies show that increased commercial development or subdivision creation is necessary or desired. While we recognize that there may be a need for increased housing in this area, we feel that this should be researched in more detail before drawing conclusions. We question the need for further commercial development here, which we anticipate would be seasonal in nature, and taxing on organizations providing necessary services.

Again, thank you for the opportunity to comment and for taking this most important step forward towards better, more active land management in the Denali Borough. We look forward to reviewing future drafts as you work through this process.

Sincerely,

/s/ Hannah Ragland  
President, DCC Board of Directors