

Denali Citizens Council



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

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November 30, 2018

DCC Comments on Wilderness/Shoulder Season Vision Document Submitted via PEPC

The Board of Directors of the Denali Citizens Council offers the following comments on the scoping effort for the vision document on winter and shoulder season use in DENA. We have a few general points followed by some more specific concerns.

Scope: We question the National Park Service's decision to leave portions of the park additions south of the Alaska Range out of this planning document. It is particularly ironic that NPS gives as its rationale that it has insufficient information about visitor use in the area to consider it at this time. Apparently NPS has completely forgotten the 2006 Backcountry Management Plan, in which motorized use in this portion of the park was one of the major issues. At that time NPS established desired conditions for this area, and pledged to monitor visitor use and resource conditions to determine whether further action was necessary. Now NPS confesses 12 years later that it has essentially ignored its plan and in effect completely abandoned this portion of the park that receives significant if apparently unknown amounts of visitor use, where non-motorized visitors have been displaced entirely, and where wilderness resource values were thought to have been compromised. The 2006 BCMP warned of potential impairment of wilderness resource values in this area. NPS failure to follow through on its plan calls into question the entire adaptive management framework on which the plan was based, and the validity of the planning model itself (which NPS has also employed for vehicle management on the park road).

You need to fix this. Addressing the potential impairment of park resources is NPS's most important purpose. If it cannot be addressed in this document, we request that NPS cease this new planning effort until it has implemented the 2006 BCMP as regards winter use in the park additions. The resources devoted to this plan would be better spent fulfilling commitments you already made and where park resources are known to be at risk. Please review the findings in the BCMP EIS and the comment letters regarding snowmachine use on the south side, and responses to comments in the final EIS.

Season Definitions: The distinctions between winter and shoulder season don't seem particularly large or mutually exclusive. Consider simplifying the plan by just having a single "winter" or "off-" season. If you do retain the shoulder seasons,

perhaps the shoulder spring season should begin whenever the park road is plowed past Headquarters.

Desired Conditions: Kudos for including “Night Skies” and “Soundscape” among the desired conditions. However, these elements also illustrate why the distinction between winter and shoulder seasons may not make sense. Why doesn’t the shoulder season have the same level of night sky protection as the winter (it is just omitted as a condition instead)? There are plenty of dark skies in the shoulder seasons. Reading through the desired conditions, we could not find an example of where the condition should not be the same for winter and shoulder seasons.

We do find it odd that the desired conditions in the Backcountry Management Plan are not referenced at all. Reconciling these conditions to the existing GMP framework is essential.

Alternatives: We lean toward Alternative 0 (No Change) or Alternative 1 (Wilderness Focus). These alternatives are most consistent with provisions of existing management plans that we supported. Alternative 0 is confusing in that it indicates “no plowing until spring road opening” while the actual current condition is that NPS is plowing to Mountain Vista before that. This brings us to the next point.

Park Road Plowing: The 2006 DENA Backcountry Plan and EIS calls for winter maintenance of the park road to milepost 7 to help prevent the buildup of ice on the road (BCMP Final, p.56). An EA, supported by the FONSI signed by the Regional Director in 2013 allowed for a 5-year experimental plowing to milepost 12 (Mt. Vista) to gauge the demand and usage of winter access to that potential destination. We are not aware of a decision document signed by the Regional Director that allows for the continued expense of plowing the park road in February to allow for some buses and private vehicles to get to Mt. Vista during that part of the winter. Admittedly it is now 12 years after 2006, and visitation patterns and Vision issues may have changed, but no monitoring and documentation have been presented that fully support re-purposing the paved part of the park road in winter as opposed to what is described in the BCMP.

Cost: We are concerned about the cost of providing enhanced winter services, and that cost siphoning off funds from summer season services. We note the following:

1. Evidence to support additional facilities, staffing, and park road maintenance beyond park headquarters (HQ) in the winter is lacking beyond increases in park visits during January –March, which the 2017 Plowing Report says may be unrelated to the Early Road Opening. (ERO).
2. Funding for the additional infrastructure, maintenance, and patrols proposed in this vision document is undisclosed. Three options appear to be: Congress, user fees, and switching money from summer programs. Congress is a wildcard, with high-level talk about reducing the federal deficit. User fees were proposed as the backstop for supporting the additional road maintenance necessary to plow the

park road instead of early March for the standard 2010 road opening to early February to allow bus travel from Feb. 15 to Mt. Vista. It is not clear that those projected user fees either are being collected or have become in any way sufficient to fund the additional expenses incurred to open the road by Feb. 15, estimated at a minimum of \$44,000 for the 2017 ERO. The 2018 example of switching money from the summer Disco Hike toward funding to support the winter/spring operation of the MSLC was a mistake in that higher priority ranger/public summer programs suffered so that funding for in-house winter information –that could be automated –was supplied to bus travelers who rarely went beyond the MSLC.

3. The NPS has traditionally taken responsibility for knowing which groups are in the park backcountry and who might be late on their proposed schedule and what rescue responses might be necessary. This responsibility for park rangers comes at a staffing level cost undisclosed in this vision statement and concepts.

Miscellaneous Other Concerns

1. Any vision for winter use of the park needs to address personal preparation, including attention to clothing and specialized gear, food and unfrozen fluids for trip duration and for exigencies, and for weather forecasts.
2. We are unaware of use of the park's historic cabins in recent times that did not require the person responsible for the use - usually a guide with the mushing concessioner or a park ranger - to have a working satellite phone and to have significant insurance, in case of emergencies and fire. Replacing one of the historic cabins would cost over \$500,000, and the historic significance is of course irreplaceable. The satellite phone/insurance requirement has also applied to winter use of the Quinzee huts since their construction. How would these requirements work if individuals are utilizing public use cabins?
4. The scoping document is very hazy on when end-of-calendar road plowing beyond HQ might occur. Obviously it is significantly dependent on weather, but also on funding constraints and public expectation. If you say that the road is closed after the first significant snowfall in October and that snowfall closes the road on October 1, who would you be serving if the plowing of that particular year could open the road again on October 20? The local (and business) expectation is that the road would be closed at HQ after Oct. 1, under this scenario, and that any additional road opening past HQ until Feb/Mar would be met with yeah/sure speculation by the local public occupied with other winter preparations.
5. Anyone extending park road use into October should consider that this is a time when bears are either looking for suitable den sites or are looking for additional food sources because they haven't found enough to get them through the winter. Biking the park road alone at this time could be more dangerous than usual

because of the infrequent traffic, hazardous weather, and stressed bears.

6. The park needs to clean up its regulations regarding pets in wintertime, specifically dogs in private teams. The 36 CFR regulation states that § 13.978 Pets.
Possessing a pet is prohibited -
(a) In the FDA, except in public parking areas, on or immediately adjacent to park roads, or in designated campgrounds.
At the end of the pavement any dog sledding outside the Mt. Vista parking lot (or Savage Campground) off the road but within the FDA is not legal. An example would be the present trail leaving the road corridor just beyond the Savage CG. Any dog team that wanders off and on the park road also goes against the present regulation. A simple regulatory fix was already drafted but has not left the park.

Thank you for the opportunity to comment.

Charlie Loeb
Denali Citizens Council