



Denali Citizens Council

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To the Denali National Park Planning Team,

On behalf of the Denali Citizens Council, founded in Cantwell in 1974, we are pleased to submit these comments on the Denali Winter and Shoulder Season plan. We understand that this process, conducted outside of NEPA, is meant to be a preliminary survey of possible approaches to anticipated increased tourism outside the summer tourism season, and to provide input for the preparation of a Finding of No Significant Impact for the EA for winter plowing of the Denali Park Road, originally published in 2013.

We congratulate NPS on recognizing and articulating the important wilderness values of Denali in winter, and developing planning concepts that are largely consistent with providing a wilderness recreational experience. This is why Congress set aside this national park.

We note that the plan divides the visitation year at Denali into the **summer season**, beginning mid-May and ending after Road Lottery in fall; the **fall shoulder season**, beginning after Road Lottery and ending when winter weather closes the park road; the **spring shoulder season**, beginning when plowing slowly opens the road in spring (either west of Mt. Vista or west of Headquarters) and ending in mid-May with the summer season; and **the winter season**, when the road is closed by winter weather (either west of Mt. Vista or west of Headquarters). If our assumptions here are incorrect, we would invite clarification in writing.

We understand that this temporal definition for shoulder and winter seasons can vary greatly from year to year, mostly because of weather variation. We also understand that the scope of winter season tourism activities could vary based on what NPS concludes as the preferred alternative of the 2013 Winter Plowing EA. If NPS decides to plow the park road as far as Mt. Vista Rest Stop as it has been doing on a temporary basis since that EA, beginning in early February, winter season activities will occur in a wider area of the Entrance Area of the National Park. If NPS decides to begin plowing the park road later or not at all, opportunities will change. Our comments will address these possibilities.

General scope and vision of the plan

1. **We appreciate that the plan places resource protection in the winter/shoulder season as a paramount consideration in the plan.** We also appreciate that the plan does not attempt to preload any particular scale or scope of activities into the winter and shoulder seasons, recognizing “uncertainty of future visitation... winter temperatures, the length of daylight, and the seasonal habits of wildlife (p.11),” and advocates flexibility and not committing itself to providing for visitor numbers that may never materialize. Denali National Park does not need to be all things to all people, and can maintain its uniqueness within a spectrum of available opportunities on other lands in the region.
2. **We appreciate that the plan recognizes that winter recreation is characterized by non-motorized wilderness recreation.** We remind the National Park Service that once closed by winter weather, the unplowed sections of the park road become backcountry and are regulated under the stipulations of the

Denali Backcountry Plan.

3. **We understand and support the NPS goal of concentrating the impacts of winter tourism in the entrance area of the park.** That said, however, we urge NPS to limit tour-bus-centered tourism at the entrance to the park, given limited infrastructure and greater challenges of weather and physical fitness for large groups.
4. **Protecting resources is paramount in any winter/shoulder visitation scenario.** We urge NPS to limit impacts on potentially quite fragile park resources by limiting shoulder season access to the park road for motorized vehicles, limiting the use of quinzees deep within the wilderness park, and discouraging commercial use of planes, snowmachines and helicopters in the park additions.
5. **We are concerned about NPS's lack of interest in fulfilling its commitments** under the Backcountry Management Plan for monitoring and responding to heavy winter use on the south side of the Alaska Range, believed to primarily be people riding snowmachines claimed to be legal under the as-yet-undefined ANILCA "traditional activities" clause. Is there a plan for this commitment to be implemented?
6. **Similarly, we remain concerned that NPS has fallen short in gathering robust data on indicators and enforcing standards for motorized traffic under Denali's Vehicle Management Plan.** Any plan that would add traffic to the park road west of Savage River check station must commit to adhering strictly to the indicators/standards of the VMP.
7. **Climate change must be a factor in planning for uses and impacts.** Warming trends have resulted in longer falls and earlier springs in the Denali area. Just as this change appears to support more visitation, it also creates troubling impacts to multiple park resources, including wildlife and its movements and stressors; snowpack and viability for skiing and mushing; and the safety and structural integrity of the park road. We are particularly concerned about Denali's vulnerable wildlife in any scenario of increased motorized use, both from tourism and from NPS administration.

Specific approaches addressed within the plan

1. **Park additions - Kantishna section (p. 23) and Stampede corridor section (p. 26).** Any snowmachine/motorized activities associated with visitor services may not meet a definition of traditional activities. Until *traditional activities* has been defined for the park additions, NPS should not appear to authorize their use in tourism, even indirectly.
2. **Kantishna section (p.23).** The National Park Service should exercise its authority with respect to the Kantishna airstrip and limit the airstrip's use for recreational access in the winter. Protection of the soundscape resource, routinely violated in summer, should be a hallmark here. Protection of the

soundscape resource in Denali's northern additions means that NPS should not authorize commercial activities that utilize airplane or helicopter landings in these regions.

3. **Winter plowing to Mt. Vista (p. 28)**, beginning in early February and resulting in a plowed road by Feb 15. This activity could continue, but NPS should institute wildlife closures to off-road activities during crucial wolf mating and denning activities throughout the months of February and March. If wolf rendezvous and denning activities are occurring close to the park road close to the potential start of plowing, the start must be delayed. NPS should not construct any plug-ins or electricity-dependent structures at Mt. Vista. Sightseeing, with its large vehicles and crowds, should not dominate the recreational landscape in this area.

It is not clear why the park continues to drive on (and groom) one lane of the pavement west of headquarters all winter to check on auffs. A multi-million dollar project in 2008 added nine eight-foot diameter culverts, raised the road prism, and carved out a large ice storage area uphill of the road ditch, all to keep water from running over the road, at least in the quantities that could create 8-10 foot mounds of ice on the road in the past. Since 2014 snow and ice removal has started in early February, removing February as a time when ice could pile up on the road and impede spring road opening.

4. **Vehicle access west of Mt. Vista during the spring shoulder season.** We understand that early, warm spring weather has enabled NPS to begin spring road opening as early as March in recent years. However, we do not support widespread motorized use of the park road in the spring shoulder season, given wildlife impacts and unpredictability of the weather. Possibly, the road could be open to motorized use as far as Savage River in the mid shoulder season, then open to hikers and bicyclists as appropriate west of Savage. These openings must be conditioned on wildlife impacts analysis.

We do approve of the idea that whenever tour buses are allowed on a road segment, that the park should also schedule at least an affordable schedule of transit/shuttle buses or vans.

5. **Vehicle access to Teklanika in fall shoulder season (p.33).** Leave this access substantially as present, option 1 or 2.
6. **Trail grooming (p. 36).** We support continuing to groom trails in the entrance area as currently. If a Nenana River trail is constructed, let it be user maintained. In the Mt. Vista area, trails should be user-maintained. We do not support the use of fat tire bikes or ebikes on trails in the entrance area.
7. **Public use shelters.** Providing public use shelters/cabins is an idea that has been rejected many times in the past, including the idea of converting the Upper Windy and Riley Creek cabins to public use during the early 1990s South Slope DEIS proposals. Senator Stevens-sponsored congressional appropriations for cabin construction in Denali National Park were sent to Kenai Fjords and Wrangell St. Elias National Parks, whose missions are not the same as Denali's.

The newer idea to construct quinzees, currently available only to the park concessioner, for public use is interesting in the context of the over 80 public use cabins operated by the Alaska State Park System, those operated by BLM and the Forest Service, plus those semi-public huts offered by the Mountaineering Club and American Alpine club. Their use in a national park wilderness may be both unnecessary, given other opportunities, and inappropriate, given the Congressional mandate for Denali's core wilderness.

Three considerations need to be in play:

- a. The public would need to have an expectation as to what to find at a shelter and the level of self-reliance that is required. Are rangers paid to regularly patrol the area (in winter) where the huts are located? What types of emergencies would trigger a motorized response (missing a flight?) Is firewood supplied for a wood stove, and how often?
- b. The shelters' schedule cannot be hijacked by commercial interests. If commercial authorizations separate from the current concessioner are allowed, they should be allowed only to book a small percentage of shelter nights, leaving shelters open to independent users.
- c. The shelters must be affordable, within the range posted for other federal and state cabin rental.

We are dubious regarding the use of these shelters in a wilderness park. The quinzees, hauled to "developed areas" during the summer season, magically convert to backcountry shelters when weather closes the road. We do not believe they are required as an element of wilderness recreation, we are concerned with the impacts they may cause through increased administrative presence. In any case, we are not ready to support their use west of Igloo Campground.

8. **Winter Visitor Center.** Maintain the MSLC as current VC. Monitor increased visitation. Discourage the use of large, motorcoach-type visitation that dumps 40 people at a time into the one VC. Encourage hotels that bring guests to the entrance of the park for three season activities to utilize opportunities outside the park and to understand that facilities are limited. We feel that the extreme cost of opening an entirely new or extensively renovated VC for winter use is not justified, given other park needs.
9. **Commercial Guided Activities** – We do not support guided activities in Denali's winter wilderness beyond what is currently authorized with the park concessioner. Park partner Alaska Geo could conduct educational sessions in the general entrance area. Commercial tours could visit MSLC and Mt. Vista, if open, but NPS should encourage small groups, van size, over large commercial coaches.
10. **Costs** - The Operational costs of the 4 concepts are understated by a large margin. In Concept D, for example, an opening of the Bus Depot for the winter, with \$3.5 million in upfront costs, is said to only require \$60,000 in addition annually for heat, electricity, water and sewer, not to mention the



additional staffing over what currently runs the MSLC (which does not close under this concept). It is also unclear why spring road opening in Concept A is pegged at \$106,000 versus only \$77,000 in Concept B, C and D.

We remember that part of the Regional Director's reasoning for signing the temporary authorization of winter road plowing in the 2013 FONSI was the assurance given that road users would pay for the staff and equipment time needed for keeping the road open and safe. Can the park quantify the costs associated with current plowing the road early and the fees that come in related to that opportunity?

11. **Concept B: Light Touch.** Among the Concepts for Winter Shoulder Season visitation in this plan, Concept B is the best way to preserve resources until further monitoring, especially of potential for wildlife impacts, provides a baseline for more activities in the entrance area. The Park Road could be plowed to Mt. Vista, but only if very tight resource standards were adhered to and potentially later to allow for early wolf denning and mating activities in February. It will be important to introduce new tourism activities only when a proven need is shown and only when impacts to the changing winter ecosystem of Denali are analyzed.

We appreciate the opportunity to comment on this plan and would like to remain involved as the ideas are developed and projects are proposed.

Sincerely,

/s/ Nancy Bale, Charlie Loeb, Steve Carwile, Hannah Ragland, and Nan Eagleson

DCC Board