



Denali Citizens Council

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October 30, 2019

To the Denali Park Planning team:

On behalf of the board and members of the Denali Citizens Council, founded in 1974, we are happy to provide comments on the Wonder Lake and Kantishna Area Plan. Wonder Lake and Kantishna have long been a favored destination for many of our members. Some visit the campground yearly for a coveted vacation of berry picking and hiking, under the vast expanse of the Alaska Range. Others have strong connections to the lodges in Kantishna, where they have lived, worked, and visited for years developing a community of friends, enduring memories and love for the place. Our members accept and celebrate the highly regulated park road and are willing to wait in line for a turn to enjoy this visit. We support the park's mission to protect and preserve wildlife and habitat, unimpaired, for the enjoyment of future generations.

Given this background, we are very distressed by this plan, which focuses entirely on recreational development with limited attention to the issues of greatest concern. Indeed, the entire purpose of the plan seems to be the development of Kantishna and Wonder Lake as a major visitor destination. This is an error for several reasons.

First, there are significant and serious issues related to protection of park resources, which the plan does not address and which recreational development will aggravate rather than ameliorate.

Second, NPS is already struggling with just keeping the park road open and traffic within capacity limits. Creating a destination at the end of the road with commercial interests that will demand profitable operating conditions is the height of foolishness. What is the fate of these enterprises – and this plan – if NPS is unable to keep the road safe west of Polychrome? What happens to other park visitors when lodges and commercial guides insist on priority for their visitors when road capacity limits force NPS to choose who gets to go? When the park road structure is in question and park road traffic is approaching (or past) its maximum capacity, it is a terrible time to plan for expanded visitation at the end of the road.

Let's have a Kantishna and Wonder Lake Plan that addresses the important issues related to park resource protection and making conditions better for existing visitors rather than trying to put more people at the end of the road.

More specific comments begin below.

- 1. Recreation in the Wonder Lake/Kantishna Area must conform to guiding park purposes.** We appreciate that NPS is under pressure from Washington DC to increase opportunities for recreation (Secretary's Order 3366, 2018). This order directed NPS and other land management agencies to develop recommendations for expansion of existing opportunities, improve the permitting process for guides and outfitters and to facilitate recreational use. However, increasing opportunities for recreation in Denali National Park cannot interfere with the core purpose of wildlife and habitat protection and wilderness

recreation, as stated in the Alaska Natural Interest Lands Conservation Act, the Wilderness Act, and Denali's own General Management Plan, with amendments. The dominance of *wilderness recreation* as the desired recreational mode in Denali's backcountry was well presented in the Backcountry Management Plan of 2006 and reiterated in the parks Resource Stewardship Strategy 2008-2027. The fact that much of the Wonder Lake region is immediately adjacent to legislatively-designated Wilderness and much of the Kantishna region is adjacent to legislatively eligible Wilderness makes this mandate even more important. Wilderness recreation does not rely chiefly on trails or a "built type" of recreational environment and stresses relative solitude in an untrammelled environment.

We continue to support wilderness recreation in the Wonder Lake and Kantishna area, with the understanding that the Backcountry Day Use area (Wilderness Exclusion) is more heavily used and may require formalized trails to protect resources. We believe that wilderness recreation is, for the most part, a matter of individual choice, not group interpretation, and we reject the Plan's introduction of increased opportunities for commercially guided groups in Kantishna. To the extent that these opportunities are already present, we accept them. We disagree with their expansion.

- 2. Management direction for this area adopted in Denali's foundational documents should be retained.** In general, these documents support limited development in Kantishna, purchase of mining claims, and the necessity of regulated road and air access to this area.

Denali's Land Protection Plan – this plan, in 1986, stated, "A major issue addressed by this plan is the potential for increased traffic on the park road associated with new visitor accommodations that might be built on private lands in the Kantishna Hills. It has been demonstrated that traffic causes avoidance behavior by some wildlife, and one of the objective of the general management plan is to reduce traffic levels on the road."

Cumulative Impacts of Mining Record of Decision (1990) – "...the National Park Service has decided to implement, in modified form, the proposed action...acquire all mining claims. This alternative is the most environmentally preferred as it has the least potential to cause damage to the biological and physical environment...Existing non-mining developments or improvements will be reviewed for compatibility with park purposes and possible acquisition."

Denali Task Force Report (1994) – This special committee created by then-Interior Secretary Bruce Babbitt and composed of a variety of stakeholders, recommended retaining a primitive, regulated park road and expediting purchase of old mining claims and private lands in Kantishna to retain wilderness character. The Task Force, in addition, recommended that the Kantishna airstrip be maintained for light use, not to transport large numbers of visitors.

Entrance Area and Road Corridor Development Concept Plan (1997) – "The National Park Service would implement the 1994 Denali Task Force Report recommendation to acquire development rights and/or property to retain the existing character and approximate level of commercial use at Kantishna."

Although we recognize that incomplete acquisition of mining claims and private lands in Kantishna has now led to the possibility of additional commercial development, something that prior planning intent sought to avoid. We ask that NPS continue its commitment to purchase private lands, considering that development on these lands will be most costly to the Park Service itself, in that the Service will be required to assist the developer with access, and will have to deal with the impacts of increased private development. There is still time to purchase private lands, even those that are under development, and we encourage the Service to consider creative strategies to acquire title or development rights to these lands.

3. A warming climate and threats to the Denali Park road make any expansion of activities in Kantishna questionable at best.

Our members have seen with their own eyes the warming of our regional climate over the past decade. This warming has begun to affect the structure of the Denali Park road, to the point where access to Kantishna may need to be further limited. In addition, this warming trend will affect any infrastructure project, road or trail maintenance, or increase of guided activity in Wonder Lake/Kantishna itself. Periodic flooding events in the Kantishna area are likely to occur more frequently in the future, and plans for extensive infrastructure in this area must be mindful of these trends. The precautionary principle dictates that a comprehensive expansion of human activities in Kantishna is the wrong choice.

There are those who may suggest that if the park road is not viable then increase access using the Kantishna airstrip. We oppose this strategy from the standpoint of natural soundscape protection and safety.

4. Desired conditions listed in this plan (pp. 14-15 in the Plan) do not adequately reflect our members' goals or NPS foundational goals for Kantishna.

Our rewrite of desired conditions is given below.

For Kantishna

- a. Overview** – Kantishna is a place for visitors to spend multiple days. It is accessible by bus, within the limits established according to the standards and indicators of the Denali Vehicle Management Plan (2012). Kantishna airstrip is small and regulates air access to conform to soundscape standards established in the Denali Backcountry Management Plan (2006). The backcountry has wide and expansive vistas interrupted as little as possible by signs of built infrastructure. The Day Use area provides opportunities for interpreting Kantishna mining history and accommodates groups of visitors both from nearby lodges and arriving independently.
- b. Visitor Experience** – Kantishna offers opportunities for day and overnight use, but development of accommodations on private inholdings is limited through purchase agreements and conservation easements, with a focus on maintaining the level of commercial accommodations as recommended in the Entrance Area and Road Corridor Management Plan (1997). NPS provides opportunities to appreciate the natural history and historic mining history through existing interpretive programs at the Quigley Cabin, Discovery Hikes and Alaska Geographic programs. Trails are formalized only where use patterns and rehabilitation needs suggest it. A small campground, close to the Kantishna Airstrip

and preferably on previously disturbed land, could occur, but with minimal infrastructure and maintained by NPS. Any campground in this location would be small and not designed to encourage increased visitation, only to accommodate those arriving by bus with not enough time to begin their backcountry hike.

- c. **Resource Protection** - Wildlife habitat is protected and closures protect sensitive areas as needed. Aircraft access to the Kantishna airstrip or other landing areas in the park additions will be timed and routed so as to maintain the natural soundscape within standards set in the Backcountry Management Plan (2006).
- d. **Backcountry Management** – Whether in existing or eligible wilderness, opportunities for solitude and unconfined recreation, both overnight and day use, are preserved. No backcountry campsites are identified or built.
- e. **Business Opportunity** – Commercial guided recreational opportunities do not exist beyond what is currently provided by existing lodges, NPS itself (Discovery Hikes), the park concessioner (KE) and the park partner, Alaska Geographic.

For Wonder Lake

- a. **Overview** – Wonder Lake is a place for visitors to spend multiple days. It is accessible by bus, within the limits established according to the standards and indicators of the Denali Vehicle Management Plan (2012). The backcountry has wide and expansive vistas interrupted as little as possible by signs of built infrastructure. To that end, the structures at Dalle Molle Ville are removed and their function absorbed elsewhere. Formalization of the Washburn Trail and McKinley Bar Trail spur reduce hiker impacts to sensitive vegetation and will close networks of social trails. Trails are formalized only where use patterns and rehabilitation needs suggest it. Beyond the Backcountry Day Use area or Wilderness exclusion, evidence of human presence rapidly decreases and wilderness recreational experiences dominate.
- b. **Visitor Experience** – The Wonder Lake Campground continues to provide overnight accommodations with outstanding opportunities to enjoy the lake, the vistas and local hiking opportunities. To prevent resource damage and promote safety, boardwalks and maintained trails will be considered in wet areas, along with food storage and bathroom facilities. Outstanding opportunities for wilderness recreation, as defined in the Backcountry Management Plan (2006), are retained, aimed for those willing to approach the area in its natural condition. The campground could be expanded, but without group campsites, and only after demonstrated need.
- c. **Resource Protection** - Wildlife habitat is preserved and closures (with signage) protect sensitive areas. Infrastructure that impacts resources is removed. Soundscape is protected through stipulations on local aircraft use.
- d. **Backcountry Management** – Whether in existing or eligible wilderness, opportunities for solitude and unconfined recreation, both overnight and day use, are preserved. Limits of group hiking size established in the Backcountry Management Plan are maintained in both the Backcountry Day Use area and the Wilderness beyond it. Trail crew lodging could be provided on disturbed lands adjacent to the Wonder Lake Campground.

- e. **Business Opportunity** – Commercial guided recreational opportunities do not exist beyond what is currently provided by existing lodges, NPS itself (Discovery Hikes), the park concessioner (KE) and the park partner, Alaska Geographic.

5. Recreation Infrastructure – Campgrounds and Access Roads (pp.19-26)

- a. We are opposed to NPS’ making a commitment to “maintain Moose Creek road, Skyline Drive and Eldorado for motorized use.” Identification of these routes as trails is the best option. If an inholder on any of these routes can assert rights, let the inholder do the maintenance. We urge NPS to acquire inholdings through purchase to avoid the expense of road maintenance. In addition, problems relating to gravel acquisition, not even discussed in the Plan, make a “promise to maintain” complex and expensive. And, increasing ground moisture and vegetation overgrowth related to climate change will affect NPS’ ability to maintain any “road” in Kantishna, for any reason.
- b. We could support a small campground with minimal amenities in Kantishna to accommodate late-arriving backpackers so that they are not camping illegally in the Day Use Zone. This could be located on the bench above Friday Creek and could even be co-located with NPS administrative facilities there. Further analysis of use trends, climate factors, and the condition of the road between Moose Creek Bridge and Kantishna would be necessary before this infrastructure should be considered feasible.
- c. If a need can be established through a NEPA process, carefully planned additional campsites at Wonder Lake are possible, but we oppose group campsites in either location.
- d. Rustic shelters would be a new phenomenon in Denali and their use in Kantishna would require carpentry infrastructure or more road traffic to build and transport them. Little need has been established and these structures do not comport with the concept of wilderness recreation. We oppose.
- e. At this time, we oppose backcountry campsites in a place like Kantishna, where demand does not seemingly exist and where maintenance of these sites would create its own administrative impact. We realize that these sites have been envisioned in other park planning documents, but fail to see a proven need.

6. Recreation Infrastructure - Proposed Trails (pp. 25-60)

DCC members are opposed to widespread construction of trails in the Kantishna/Wonder Lake area, beyond what was envisioned in prior planning documents. We seriously doubt NPS has the capacity to maintain 80 miles of trails in this remote location, and trail maintenance is likely to become more difficult as climate change alters the ground on which those trails are constructed. Construction and maintenance of such an extensive trail system would mean a permanent trail crew stationed at the west end, which we do not believe is desirable for reasons of cost and administrative impact. Reasonably, NPS should seek to construct the minimum number/mileage of trails that would allow remediation of damaged areas and satisfy existing levels of visitation.

We support the construction of trails outlined in the Entrance Area and Road Corridor Plan (1997), including trails at the north end of Wonder Lake (Anderson Trail and Blueberry Hill) and the McKinley Bar Spur Trail. We support additional formalization of trails as outlined in the Final Denali Backcountry Plan (p. 72). This would include construction of the “Washburn Trail” out of the Wonder Lake campground area and, in addition, would include the possibility of formalizing some existing social trails within units 41, 42, and 43. While we are flexible about which trails should be constructed within the “minimum number” criterion, it seems like the access trail from the park road just east of Kantishna Roadhouse to Camp Ridge and a trail from Moose Creek Bridge to the connect with the trails at the north end of Wonder Lake would be sufficient. These trails would be very useful to existing users and would replace social trails that have resulted in extensive damage to the landscape. Any formalized trail must avoid private land.

We are opposed to interpretive signage associated with trails beyond the basic level of orientation. When formalized, trails in the Kantishna/Wonder Lake area should be only of Class 2 construction.

7. Transportation (p. 61)

Shuttle loop - We are opposed to the shuttle loop proposed in the Plan (p. 61). This would introduce additional hard infrastructural needs to the area, and even an entirely new fleet of buses or vans, when in fact the need for such an expense and impact has not been shown. It is our feeling that existing shuttles, both stopping at Wonder Lake and in Kantishna, are sufficient to provide local transportation. We understand that lodges have their own vans for transportation of lodge guests to approved recreational destinations. If a need can be shown, through data, perhaps NPS can develop memoranda of agreement with one or more local lodges to provide local transport for non-lodge guests, but the justification for a whole new system of transportation, with all of its needs and impacts, has not been made.

In addition, we question the impact upon the shuttle system of air taxis’ providing one way transportation to Kantishna with the expectation that their guests would then use shuttle to go back through the park.

Bus depot at North Face or Dalle Molle Ville – It has not been shown through data that the current flow of traffic in Wonder Lake/Kantishna is providing insufficient access to hiking, camping and viewing opportunities. From the language of the plan, it seems that all transit buses would go to the depot only, and visitors would then have to take another bus to their Kantishna destination. Such a plan creates administrative impacts such as infrastructure for servicing and storage of vehicles. It has no proven need, either.

New end-of-road turnaround – We support, for safety with respect to the Kantishna airstrip, changing the turnaround of the park road as described in the Plan. We remain very concerned regarding the safety and integrity of the road between Moose Creek Bridge and Kantishna and note that NPS should avoid planning campgrounds and other infrastructure until this problem has been addressed.

8. Administrative infrastructure (pp. 67-73)

Because DCC opposes a large buildout of trails and facilities in the Kantishna/Wonder Lake area, we question the need for extensive new administrative infrastructure. We also believe that NPS should use existing disturbed areas as the core of any new administrative infrastructure. We question the “potential future needs” listed on p. 68, and invite NPS to do a more thorough analysis of how these numbers were reached.

Our suggestions for administrative infrastructure:

- NPS can continue to store overnighting buses at Wonder Lake Campground.
- Trail crew, when carrying out projects, can be housed at temporary facilities at Wonder Lake Campground.
- Administrative functions can be split between Wonder Lake Ranger Station and already disturbed ground near Friday Creek in Kantishna.
- We support the removal of structures from Dalle Molle Ville and rehabilitation of this area.
- We do not support the use of eligible wilderness along the Moose Creek “access road” for any new administrative structure. This valley is an important destination for walking tourism and should remain as it is.

9. Visitor Experience and Capacity (pp.74-83)

The Denali Citizens Council believes that existing services and infrastructure serve the Kantishna/Wonder Lake visitor well, and we question the need for additional new types of services, such as commercial day hiking and commercially-supported overnight camping. It is already expensive for the average visitor to get as far as Kantishna. An adult must pay \$58.75 for a transit ride to Wonder Lake, \$64 to Kantishna, in addition to the \$15 Park Entrance Fee. We understand that commercial use authorization for guided hiking services was envisioned as a possibility in the Backcountry Management Plan. However, we are concerned regarding both the expense of such services and their tendency to displace the independent user.

Data from the 2018 day user survey indicates that there is not an overriding demand for guided day hiking services, and that backpackers prefer solitude and trail-less experiences. If the Wonder Lake Campground is already close to capacity with mostly independent guests, we are concerned that guided guests would in fact displace independent users.

According to data on p. 75 the units accessible from Kantishna (41, 42, and 43) are currently minimally impacted by overnight users (backpackers). We are not sure if the provision of overnight guided services to this population is desired or wanted by backpackers. It would seem that NPS is attempting to encourage new backpacking use in the Kantishna area, without knowing or understanding exactly what impacts this new use would make on the park bus transportation system, on non-guided independent users, on the Kantishna airstrip and on regional small plane activity.

Day hiking in Kantishna will continue to be composed of a combination of lodge users and independent guests, arriving by either air or bus. We see no data in this plan to indicate that additional commercial day

hiking opportunities are needed or wanted above what the existing lodges offer, what the Kantishna Experience tour offers, and what the Alaska Geographic offers.

We do agree with NPS that some backpackers may be camping illegally in the Kantishna Day Use area, because of late arrival and difficulty in getting out of the day use area into their unit. We see some justification for limited camping facilities for this population. We do not, however, support a large campground with multiple amenities or rustic shelters. NPS can determine how many campsites might be needed to serve this identified group, and provide them. Such a campground would not be for the purpose of supporting extensive, commercially guided excursions and could be sited within an administrative site, near Friday Creek or the airstrip. A small campground in Kantishna is going to be buggy and noisy, and road access is troubled.

10. Guided Services (p. 78)

The Denali Citizens Council sees no need for additional guided interpretive activities in Wonder Lake/Kantishna beyond what is already offered through the Kantishna Experience, Discovery Hikes and Ranger Programs, private lodges and Alaska Geographic. If a new visitor to the park wants interpretation, it is available. No overriding public outcry for this has been made.

In addition, we question whether offering business opportunities for day and overnight hiking in Kantishna, an area accessible only by a highly regulated road and regulated air access, is even feasible. We are told that noise from the Kantishna airstrip is already violating standards, and now NPS wants to encourage additional use? We are told the standards along the park road between Eielson and Wonder Lake are close to violation and now NPS wants to encourage additional use?

This cart-before-the-horse approach has not been requested by the majority of users. It would add to the expense of a visit, could displace independent users and could lead to further impairment of resource indicators. We argue that plenty of interpretation already exists, both in Kantishna and at the Entrance Area of the park.

The responsibility of the National Park Service is to protect resources and wildlife habitat for people to visit and enjoy, unimpaired. People will come for the resource, and will seek information as a part of their visit. Such information and interpretation need not be pre-loaded into every visit. NPS need not feel remiss in simply providing an unimpaired park, with adequate transportation, campgrounds and hiking trails where use makes them necessary. In addition, NPS must limit traffic, both by vehicle and by air, to protect resources. The people will understand.

Extensive offering of Commercial Use Authorizations distances the National Park Service from its core mission. When authorizing guiding and interpretation to private entities, NPS has the duty to ensure that the information and direction is accurate, safe and ethical. We are concerned that NPS will lose control if it delegates many of its core functions to private entities. Up until recently, national parks chose to limit private commercial activities, opting for one concessioner to help them operate transportation and lodging, but hiring NPS employees to do the interpretation and resource protection. In the past 20 years, additional

nonprofit park partners have provided some educational services, in close concert with the Service – something we support. We understand that shrinking budgets and a backlog in maintenance may be influencing the Service to seek outside business assistance with its core mission. However, DCC feels this trend is dangerous for the Service and for the future of resource protection in our parks. In Kantishna and Wonder Lake it additionally has not shown to be desired, nor has it been shown to be feasible, given the limited access to this area. Why would NPS encourage CUAs for guided hiking and other functions in an area already close to capacity because of road limits and air access limits?

11. Implementation Concepts (p. 84 -92)

The Denali Citizens Council understands that some infrastructural needs exist in Kantishna, but not nearly those identified in Concept D, Optimizing Recreation. Given our concerns, already expressed, we suggest a limited Version of Concept B, Meet the Basics. Details below:

Concept B Modified – Meet the Basics with changes

- a. **Description** – emphasize resource protection and wilderness recreation. Opportunities to use a campground or access the backcountry are retained as they are now.
- b. **Visitor experience** – vast views, intact habitat and access to some trails are part of the visitor experience. Access to ranger and campground host provides information. Guided activities for independent users are limited to Discovery hikes. Lodge users and those who have purchased a tour can enjoy guided activities through their lodge, through the Kantishna Experience, or with Alaska Geographic.
- c. **Overnight facilities**
 - a. No rustic lodging structures
 - b. Possible small, primitive campground near Kantishna bus turnaround, possible additional sites at Wonder Lake campground.
 - c. No group camping.
 - d. No backcountry campsites
 - e. Improvements at Wonder Lake Day Use Area to protect resources.
- d. **Transportation to the area**
 - a. Transit, tour, air taxi, camper bus at current levels.
 - b. No larger planes (such as otters) at Kantishna airstrip
- e. **Transportation within the area**
 - a. No area-specific commercial transport system or bus depot.
 - b. Possible agreement with existing lodge to some van transportation of independent visitors, with vehicles already serving the lodge.
 - c. Independent users rely on transit and camper buses for transportation.
 - d. Private vehicle access to inholdings is closely regulated.

f. Infrastructure

- a. Formal trails – Washburn Trail, McKinley Bar spur, improve access from Kantishna to Camp Ridge. No newly constructed trails. Rehabilitate severely damaged trails after data shows a need.
- b. No trailheads
- c. No biking on trails.
- d. Park road turnaround near Gallop cabin.
- e. Administrative footprint uses existing areas, Friday Creek and Wonder Lake Ranger station. Remove structures at Dalle Molleville.
- f. Airstrip –Requires a separate, NEPA document. Firm decision to keep larger planes out and control the soundscape.

12. Project Phases (p. 94)

Under Project Phases, NPS describes a process in which environmental compliance (NEPA) begins in Phase 3 and is concluded in Phase 4. We would like some assurance that NPS intends to conduct at least an Environmental Assessment on the entire plan, including a preferred alternative and several reasonable alternatives. It is possible that this plan will include elements that could elevate it to an EIS -- we certainly see plenty of room for controversy. We are concerned that NPS will adopt the plan – formally or informally – without doing an environmental review on the entire document, and then piecemeal compliance for individual projects. While NEPA requires a cumulative impact analysis, that often seems an afterthought in these documents and we really want to see the plan considered as a whole.

13. A Better Approach – A Comprehensive Kantishna Plan.

DCC has long supported the preparation of an Area Plan for Kantishna, but we find this Plan both limited in scope and overly focused on new recreational development in an area where the need for that has not been shown. The future of Kantishna will depend on several issues that were unexplored or barely explored in the plan. A more comprehensive analysis would do well to include them. We list them below.

- a. **Purchasing or placing under conservation easement remaining private properties.** NPS seems to use the fact that no funding has been available since the early 1990s as an excuse for not doing anything. Really, land acquisition just has not been a priority because it is very difficult, which is a lousy excuse. NPS management has not taken any initiative on this front except for the defensive and reactive Spruce Creek action. But if you never plan for or work toward this goal, it obviously will never happen. This plan – and NPS – need to prioritize the resolution of remaining inholdings.
- b. **Long-term planning for use of the Kantishna airstrip.** Protection of the park’s natural soundscape remains a priority for our members, and it is important for visitor experience whether in wilderness areas or not. The level of use of the airstrip has the more impact than

anything else. There have been suggestions for expanding or reconfiguring the airstrip. Why is NPS not looking at the airstrip use and development in this plan?

- c. **ANILCA 1110(b) access to inholdings.** The development of new tourist facilities on private inholdings will reopen sleeping issues regarding ANILCA 1110(b). Right now, existing lodges are abiding by limits specified in NPS planning documents, but what happens when new lodges start demanding the same or better levels of access? NPS quietly allowed day tours to the Kantishna lodges to start in the 1980s and expand through the 1990s, without ever really challenging whether these uses were justified under 1110(b). New entrants could upset this applecart, particularly if increased traffic to Kantishna ends up displacing other park road visitors when road capacity is maxed out.
- d. **Climate change adaptation.** In other parts of the park, mitigating the effects of climate change is becoming a major concern. Why doesn't this plan anticipate impacts on Kantishna, and suggest proactive ways to address?
- e. **Park road planning in Kantishna.** Even though the road between the north boundary and Kantishna is a state road, this fact does not prevent NPS from jointly planning with the state to ensure road safety and collaboratively help NPS achieve its standards for natural soundscape, vehicle traffic, and so forth. The draft planning document even mentions issues like bike safety in narrow parts of the park road, but has no proposals to address the issue.
- f. **Gravel acquisition.** Gravel for existing maintenance needs is hard enough to come by, let alone for any large new project. Availability and suitability of gravel, and the impacts of its extraction, must be considered before any planning for its use.
- g. **Mining reclamation.** Although various issues related to Kantishna's mining legacy are mentioned under "Issues," the plan doesn't address any of them. Why can't this document at least identify environmental and safety hazards and make proposals to clean them up?

All of these issue categories are much more important than creating new visitor opportunities in Kantishna/Wonder Lake. This draft really calls into question NPS's interest in its mandate to "preserve unimpaired for future generations." Please issue a new plan that seeks to preserve and restore the park's resources as a primary purpose, that is consistent with the vision of Denali's foundational documents, and that first looks to improve the experience of existing visitors rather than seeking to create a new visitor destination.

We look forward to continuing our involvement in this process.

Sincerely,

/s/ Nancy Bale and Charlie Loeb

DCC Board Members: Nancy Bale, Steve Carwile, Nan Eagleson, Charlie Loeb, Hannah Ragland