



# Denali Citizens Council

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www.denalicitizens.org \* mail@denalicitizens.org \* P.O. Box 78, Denali Park, AK 99755 \* (907) 244-2510

May 11, 2020

Dear Superintendent Swanke (Denice),

Thank you again for explaining some of the ideas NPS has under discussion for the 2020 summer season. This is a very challenging time for NPS, and we appreciate that providing for the safety of both visitors and NPS and concession employees is your paramount concern. We strongly support putting safety and protection of park resources at the forefront of all decision-making, with visitor access and enjoyment next in line.

As you could tell from the phone call, we had reservations about some of the ideas for providing new commercial options and private vehicle access to the park road. After some discussion, we have crystallized the following concerns that we hope you will include in your consideration.

## **Vehicle access on the park road.**

We find the dual direction of allowing private vehicles and new CUAs on the road while planning for some buses to be illogical. If the buses can be utilized safely, then what is the rationale for any private vehicles or CUAs? The research-driven decision to restrict private vehicle traffic in the 1970s and 1980s was a good decision at the time. What has changed? Yes, there will be less demand for the buses this summer, but if they are safe then buses should be able to accommodate the demand. Yes, Alaskans would prefer to drive their own vehicles, but that is always true; there is no change that would warrant accommodating that preference. Earlier research demonstrated that small passenger vehicles have an out-sized impact on wildlife.<sup>1</sup> Why would NPS allow them back on the road now, both undercutting its own initial claim and creating a significant impact on the resource the agency is supposed to protect? We feel that the mixed traffic, with buses having to deal with inexperienced drivers on challenging parts of the park road, is a safety hazard. We are also concerned that with reduced staff NPS will not have the capacity to make this arrangement safe for either visitors or park resources.

If NPS develops a rationale for authorizing CUAs and additional private vehicles the agency still needs to address the underlying impact issue identified above. We feel that this eventuality is not covered in the Vehicle Management Plan, which assumed and modeled traffic on the park road that would primarily be buses and did not address separate impacts from majority or exclusive private vehicle use. These vehicles are not the same. Given that available evidence shows

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<sup>1</sup> Beattie JB. 1985. *Caribou reactions to traffic and construction along the Denali Park road*; Tracy DM. 1977. *Reactions of wildlife to human activity along Mount McKinley National Park road*.



the proposed vehicles could be damaging and would generate controversy, the action would have to trigger a higher level of compliance than a Categorical Exclusion. We believe NPS must complete at least an Environmental Assessment to consider such a move.

Our concerns would be reduced if the CUAs and any other private vehicle traffic are turned around at Mile 30. There is generally less wildlife to disturb in this area, private vehicle traffic going to Teklanika Campground is an existing feature of road use, and the safety issues are less of a concern on this two-lane section of road.

### **Commercial Use Authorizations**

We have additional concerns about any new road transportation CUAs. It should be clear that these CUAs do not include any guided hiking within the old park. We are worried how these CUAs might be linked to the new authorizations for hiking in the Kantishna area. As conceived, the new guided hiking CUAs were somewhat self-limiting because not many companies had any prospect of successfully transporting customers to the western portions of the road, except for the Kantishna inholders themselves. But now there could be transportation. Will the road CUA holders then want to take advantage of the other opportunity too? Will that lead to asking for a Kantishna base on park land to stage the hikes from, since they don't have lodges or other inholdings? In theory, CUAs do not allow for land assignments, but the NPS's poor performance in allowing the Backside Lake camp to develop makes us cautious. We hope NPS will be very thoughtful about all the possible implications if you go in this direction. We also hope that any CUAs would clearly be limited to one year.

### **Research**

Looking for silver-linings, this summer could provide a unique opportunity to see how wildlife uses the road corridor in the absence of large amounts of traffic. All of us feel like wildlife sightings near the road have declined considerably during our decades at Denali, but NPS doesn't have good baseline data to say so scientifically. The Vehicle Management Plan promised a BACI study to determine whether there were any effects on wildlife along the road from increasing traffic, a study that has never been completed. While one season of low traffic might not provide any definitive results, this is perhaps the best chance to see if there is some change when traffic is removed. If NPS is serious about protecting wildlife and wildlife viewing opportunities, and complying with the mandates of the VMP, you really cannot afford to let this chance get away. But allowing untrained drivers and individual passenger vehicles out the road could easily wreck any possibility of getting useful information.

This is another excellent reason for turning CUAs and private vehicles around at Teklanika. You mentioned that the wildlife researchers are excited about getting this research done – please provide the space and time for them to do so.



## Pretty Rocks

We would just like to reiterate our statement at the meeting regarding NPS putting out information about the ongoing FHWA work around Pretty Rocks. More information is always good, and we think a lot of people who are concerned about the park road have no idea that this study is underway, nor what the timeline is. Regular updates would be wonderful.

### **In summary, we offer what we feel are some sensible recommendations.**

1. In making decisions for the summer, prioritize resource protection and both visitor and employee safety over visitor access and accommodation, consistent with NPS mandates.
2. If NPS can devise a way to operate buses safely, then offer park access with buses, as always. There is no reason not to.
3. If NPS decides to authorize additional transportation options beyond what the concessionaire can safely provide, we believe the agency should look at alternatives that can minimize impacts to safety and wildlife through an Environmental Assessment.
4. We believe alternatives for any additional transportation options should include the possibility of limiting CUA and personal vehicles to mile 30 of the park road for reasons of both safety and resource protection. Any transportation CUA should be for only one year.
5. Please prioritize providing low-traffic conditions along substantial portions of the park road to allow for once-in-a-lifetime research to determine how wildlife uses the road corridor under those conditions.
6. Please provide near-term and regular updates about future planning and current work at Pretty Rocks.

Thank you so much for listening.

Sincerely,

DCC Board of Directors

Charlie Loeb  
Nancy Bale  
Steve Carwile  
Nan Eagleson  
Hannah Ragland