



Denali Citizens Council

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Please accept these comments on the Winter-Shoulder Season Visitor Services Environmental Assessment by the Denali Citizens Council. We represent approximately 300 local, regional and national citizens who have a particular interest in Denali National Park and Preserve. Many of our members rely on the park for seasonal or full time employment. It is the park's unique landscape and resources that have attracted them, and in many cases influenced their decision to settle in the area. DCC members are among those who enjoy the park recreationally in winter.

Our members value this park and its core values of habitat protection and wilderness character. Although visitor experience is also an important element, we feel that recreation must always be provided in the context of the park's overall mission of resource protection.

Please accept the following suggestions and comments on this EA:

1. General scope of this EA

The Action Alternative of this EA addresses activities in and around Wildlife Viewing Subzone 1, between the Entrance Area and Teklanika Rest Stop. We are glad that the scope of this EA was limited, because in the planning process leading up to this EA, NPS attempted to make determinations for winter activities in many other areas of the park, including Stampede and Kantishna. It is clear that there was not enough information or need to include those areas at this time. However, we think NPS should be consistent in limiting this geographic scope for the entire EA, and thus we ask that the Extent Necessary Determination and the Desired Conditions Document be narrowed in scope to reflect only those areas covered by the Preferred Action Alternative in this EA.

2. Purpose and Need (p. 3)

NPS states, in the Purpose and Need section, "Recent growth and diversification of off-season visitation necessitate a reexamination of the visitor experience offered in Denali during the winter and shoulder seasons..." We accept the statement that there is a growth in park visitation between the months of October and April, though still small in comparison to summer numbers. According to NPS data, most of this visitation is from Alaskans, and most of them use their own vehicles. After mid-April, we note that the park road has already been opened to private cars as far west as Teklanika Rest Stop. The diversification element of this section refers to international and tour group visitation. We note that commercial tour visitation is still quite small, and may remain so for many years, especially with Covid-19 pandemic limitations.

Although we do not argue with NPS' stated need to "anticipate changes to winter and shoulder season visitation and more effectively manage visitor services and opportunities," we feel that road access for wildlife viewing and provision of simple amenities provide adequate opportunity for independent wilderness recreation experiences and that no big changes need to be made to accommodate the group



tourism market.

3. Objectives (p.4)

Sustainable opportunities: We agree with NPS that it should not act in anticipation of a certain level of future visitation that may not materialize. This is particularly relevant now during the Covid 19 pandemic.

Protection of park values: We agree that visitor services must be offered that are consistent with Denali's overall mission and provide opportunities for self-reliant wilderness recreation. We feel that visitor experiences not aligned with Denali's mission should be offered outside of the park.

Adequate and appropriate access: This term means different things to different user groups. NPS needs to be careful regarding whether there is an obligation contained in this objective. Planners and NPS leaders must remember that they have committed to a regulated road, to protect resources.

Provide for diverse visitor skill levels, interests and populations: Accommodation of visitor diversity is important; however NPS should not seem to make a carte blanche promise that all will be accommodated.

Concentrate development near the entrance area: We support this objective and find it consistent with more general planning intent. As suggested in prior comments, we urge NPS to limit large commercial bus tour impacts and encourage smaller group visits (van size).

4. Issues considered but eliminated (p. 7)

Safety – Safety as a specific consideration was eliminated on the basis that none of the proposed actions would increase safety risks. However, because of the Covid-19 pandemic, the crowding that could occur in a winter visitor center or busy rest stop warrants safety mitigations. A Covid-19 plan should be included in the final EA.

Socioeconomics - We find it curious that socioeconomics have been eliminated from consideration. It is true that the effects of increasing winter-shoulder opportunities could encourage local businesses to operate on a three-season basis. We understand that recently a developer bought land in the Healy area with just that idea in mind, and that Fairbanks businesses have spoken with the superintendent regarding the opportunities for commercial tour visitation to the park. We have understood this to have been a major motivation for the original “plowing to Mile 12” EA. Although the actual, detailed analysis of these potential effects is highly speculative, it certainly has acted as a motivator for the action and should be considered, at least in general terms, for each alternative.

5. Preferred Alternative 2 (Varied Experiences) (p. 9)

Below, we list each element of the preferred alternative with our comments and our preferred actions.

- Fall Shoulder Season vehicle access – DCC supports the preferred alternative in principle. Drivers would require education on how to behave and would need to be out of the park by dark, say at 6 PM. NPS should continue to monitor VMP indicators and standards, and wildlife condition, as long as the road remains open to private vehicles. NPS should determine through an impacts analysis of shoulder season road use, whether a timed entry or a daily quota would need to be required. NPS should analyze the cost of providing services such as



rest stop maintenance and safety patrols during these weeks. If monitoring shows severe impacts or unsupportable costs after a few years, NPS should consider a closure not related to weather, or a closure at first snow, no matter the extent.

- Winter Road Plowing – DCC had concerns when NPS first proposed winter plowing of the park road to Mt. Vista in 2013. We cautiously accepted winter plowing for a trial period, to provide access no earlier than Feb 15th while studies would be conducted. Monitoring has shown relatively minimal use of Mt. Vista in February, and greater use in March, when day length and weather are more supportive.

Given the lack of a demonstrated need to start plowing the road early in February, we suggest that NPS not open Mt. Vista until **mid-March**. Skiers and mushers could use the unplowed park road for access to the backcountry near Mt. Vista, as they had already done before 2014.

Although retrofit of the Spring Trail was an important part of the 2013 EA, and was intended to provide seamless access for park sled dog patrols from the kennels during times when the road was plowed, it is just briefly suggested in the 2019 Winter/Shoulder Plan (p. 38). The Visitor Services EA needs to provide more information regarding why this has happened. Is the Spring Trail not really a viable alternative when the park road would be plowed to Mt. Vista? What are rangers doing, right now, to access the backcountry?

- Mountain Vista Foot Bridge – DCC accepts this concept, with some reservations. The map on page 12 appears to show that both mushers and skiers will use the footbridge. Is this correct?
- Mountain Vista Mushing Access – We cannot support this access trail without additional information, which we cannot find in the EA. The request for access, we think, is meant to authorize cutting brush and providing a corridor. We cannot support this alternative without a more in-depth description of the environment and what is going to be done (cutting just brush or small trees? visual impact in summer?...etc.).
- Commercial Opportunities – DCC does not support additional non-motorized commercial winter opportunities anywhere in the Old Park Wilderness (beyond what is offered by the mushing concessioner). We do not feel that NPS has adequately shown the necessity of providing such opportunities, given the current extent and type of monitored uses. We question that group commercial activities in wilderness meet the standards of self-sufficiency and solitude that we have come to associate with wilderness recreation. NPS is not in the business, we feel, of encouraging business opportunities in wilderness, but instead in the business of providing a protected park that people can enjoy through appropriate access and wilderness recreational activities.
- Trail Grooming in the Entrance by snowmachine – Given the information provided in the EA, we cannot support trail grooming by snowmachine until other alternatives have been examined. We understand that, starting in 2017, trails shown in the map on page 13 of this EA have been groomed using a snowmachine, and that this activity has been approved by the Superintendent, as an Administrative Activity under 36 CFR 13.952. Otherwise, use of a



snowmachine is not allowed in the Old Park. Approval in this EA will somehow give snowmachine grooming of certain trails more authority, not necessitating yearly approval by the Superintendent. We do not understand how an EA can simply grant an authority that the Superintendent has had to renew yearly. Clearly, grooming trails is not essential to administering the park, but is more a way of enabling recreational access. As such, it could be accomplished through non-motorized means. An analysis of this is absent from this EA, and so therefore we cannot immediately support it, having been given no viable alternatives to choose from. We categorically oppose an authorization to groom the not-yet-built Nenana Trail by snowmachine, even if approval is granted for the other Entrance Area trails.

- Spring Shoulder Season vehicle access – We understand that the park road (Wildlife Viewing Subzone 1) has been open to vehicle access all the way to Teklanika Rest Stop over the past several years as early as April 3rd. This EA does not discuss whether or not weather is the only factor in determining the spring opening to Teklanika. We'd like to see further analysis. We ask additionally that the Vehicle Management Plan indicators and standards be monitored in Wildlife Viewing Subzone 1 as soon as private vehicles gain access, generally early to mid-April. NPS monitoring has shown that serious impacts can occur during the unregulated shoulder seasons and NPS has the responsibility of taking data on them.
- Spring Shoulder Season Transit/Tour Access - We support the closure of the park road to private vehicle access on May 10th and the start of both shuttle and tour access simultaneously, on May 10th. This will help to control private vehicular traffic in May, when uses can expand and when impacts from unregulated vehicular use have been shown.
- Shoulder season roadside parking – We do not support widely dispersed shoulder season parking either in the fall or in the spring. Although the argument that visitors need to be able to access the backcountry is somewhat compelling, a blanket allowance of parking has safety concerns and potential wildlife impacts. Limiting parking should not be considered as providing inadequate access. Instead, NPS should identify specific areas where vehicles can park, such as Primrose rest area, Sanctuary campground, the DNHT turnaround and Teklanika Rest Stop itself. From mid-April to mid-May, when the road to Teklanika would be open to private vehicles, conditions off the road are often not optimal for hiking or skiing in any case. Folks are more likely to walk or bike the park road between rest stops or up toward Sable Pass at these times.

It is difficult to understand how NPS can do a broad authorization of parking after just having banned it in most areas of the park road, using the Compendium. Reasons to ban roadside parking were, assumedly, valid at that time. The park road has values associated with it, and is considered an historic road and cultural landscape. Widespread parking at the roadside, even in pullouts, could impair these qualities.

- Teklanika Rest Area Shoulder Seasons Facilities – We accept the preferred alternative. Keep the Rest Stop itself primitive, without additional electricity or lighting.



- Teklanika and Savage Campground Access – We accept the preferred alternative.

6. Desired Conditions

DCC does not support adopting all the Desired Conditions developed in the 2019 Winter Shoulder Season planning document. Only those Desired Conditions pertinent to the Preferred Alternative in this current EA should be included. We are pleased that NPS limited the scope of this EA to the HQ to Teklanika areas, where existing uses have expanded recently, a need for management can be shown, and impacts can be anticipated. The 2019 document considered a broader set of desired conditions for more areas of the park. We hope that this EA will only include the Desired Conditions for the following; *HQ, MP 231/Nenana River Trails, Plowed/Open Section of the Park Road in winter/shoulder season, Mountain Vista and Teklanika Areas, and Backcountry/Wilderness areas* (adjacent to the area under consideration), and *Unplowed/Closed Section of the Park Road* (in the area under consideration). We ask that this EA not incorporate Desired Conditions for Kantishna, since there is no action related to Kantishna in this EA.

Our comments on the Desired Conditions are given below:

Headquarters, MP 231/Nenana River trail

Under desired conditions for the shoulder seasons, it states “The visitor center appropriately accommodates the level of shoulder season visitation.” It is unclear whether this implied promise is appropriate. While the MSLC is currently considered the “winter visitor center,” it would likely serve as the shoulder season visitor center as well. Its ability to accommodate visitation is not assured, without retrofitting. Unfortunately, this EA provides for increased visitation without making a commitment to what sort of infrastructure would be built in support of it. This definitely is “cart before the horse” planning, since any infrastructure needed to support winter/shoulder visitation absolutely belongs in this EA. We are assuming that it will be in another EA, if any alternative except No Action is chosen in this EA.

We support the MP 231 project and the Nenana River trail. We oppose any retail or commercial activities at MP 231.

Plowed/Open Section

For the shoulder season, the Desired Conditions emphasize the importance of “affordable, sustainable access that provides opportunities for independent exploration.” This is a clear departure from the desired condition of the road during the summer season, when independent access is limited in favor of access by bus, to protect resources. We are concerned regarding any statement that seems to indicate that independent access is somehow to be preferred. We are happy that this condition ends with a sentence indicating that “limits or the number of vehicles allowed west of Savage may be instituted if needed to provide for wildlife protection and visitor experience.” We would like NPS to reveal, in the responses to comments, how it intends to monitor shoulder season use in order to take actions to protect resources.

Unplowed/Closed section of the park road

These desired conditions appear appropriate.

Mt. Vista and Teklanika

Mt. Vista: “Established trails may have signage or wands”- we assume NPS intends to have minimal



signage, as some of these trails lead to and through Wilderness. Interpretive signage within the rest areas is acceptable, but beyond that, is not. Mt. Vista Rest Stop should remain very basic, without electricity, a warming hut, or vehicular plug-ins.

Backcountry/Wilderness Areas

Although these desired conditions are meant to describe backcountry areas in the entire park, recreation beyond the area covered in this EA will need additional planning. For now, these desired conditions adequately reflect DCC's notion of what wilderness backcountry is. We note that the Backcountry Management Plan has already listed Desired Conditions for the park Wilderness Backcountry. Is there a need to update them?

7. **Impacts Analysis**

Wildlife – Protecting the wildlife resource is a core, legislative purpose of Denali and we urge NPS to be proactive in fulfilling the mandate. Increased human activity in the backcountry and the road corridor between HQ and Teklanika during winter/shoulder seasons **will result** in increased interactions with wildlife, many of them stressful and some perhaps tragic. It is unclear whether the increased level of activity in the backcountry proposed by this EA will stress wildlife to the point of resource impairment, but local incidents and problems are certainly predictable. One of the reasons that DCC has recommended a later road plowing to Mt. Vista is to protect potential wolf denning and mating activities in February from the noise and bustle of mechanized plowing and access by motorized vehicles. Wolves have denned in the entrance area recently, and close to the road.

Effects of road activity and human presence on moose during rutting activities in late September could extend through into the shoulder season. Caribou move through the upper Teklanika and Savage and even the Entrance Area in all seasons. Increased use of the road and backcountry between Savage and Teklanika in spring when sheep and caribou may be moving will increase human/wildlife interactions and stresses on these sensitive animals.

Ultimately, it will be difficult to determine when the stress of human interaction creates a significant impairment of the wildlife resource. For all the years that the park road has been in existence, negative effects upon wildlife remain difficult to prove, scientifically. However, lack of solid scientific proof should not prevent proactive efforts to avoid negative encounters.

Soundscape – Increased motorized access will affect the natural quiet that has been such a hallmark of Denali's backcountry. Increased use of private vehicles will impact the very quiet soundscape of late winter and spring, before motorized intrusions from flightseeing begin to dominate the soundscape. DCC understands that none of the proposed activities have been predicted to violate sound standards in the Backcountry Plan, however there are likely to be local impairments based on individual actions of visitors. Unlimited private vehicle access adds unknown variables to the soundscape picture. Bus drivers are trained to ensure that visitors are quiet and well behaved at wildlife stops. A park road used mostly by trained bus drivers provides the least potential for loud, invasive and negative impacts to soundscape from vehicles.

Visitor experience – enhanced road access by private cars and unlimited parking at the roadside will create many impacts to visitor experience. For the Denali park road, the Murie vision included immersion in the landscape, without the reminders of civilization provided by numerous parked cars.



Protecting the Murie vision of the road is important, because it is a hallmark of the special kind of visitor experience advocated for Denali National Park.

8. **Protect wildlife from dogs**

We ask NPS to prohibit pet dogs in vehicles west of Teklanika Rest Stop, unless of course they are traveling with an inholder to Kantishna. Dogs used for backcountry mushing and jouring in any area of the park should have veterinary certificates of health. Dogs, over the course of the last several decades, have been the vector for bringing lice into Alaska's wolf population. Other diseases have been transmitted locally. Dogs bark and have the potential to harass wildlife. Local businesses and individuals will "sit" dogs while their owners enter the park. People will accept this if it is carefully explained.

9. **Be mindful of larger factors when making long term decisions**

- **Covid 19** – The pandemic will continue to affect visitation at Denali for an unknown number of years, considering its effect on the cruise ship industry and on our overall social relationships. There may be additional lessons to be learned during this period of reduced activity at Denali, reduced operations by the concessioner, and increased access by private vehicles. NPS should discuss what effects the Covid-19 pandemic is expected to have on winter/shoulder visitor services during the next few years.
- **Climate change** – While later onset of winter and earlier onset of spring have been part of the motivation for increased visitor services in the shoulder seasons, climate change may have certain impacts that overshadow visitor experience considerations. NPS needs to be ready to rewrite visitor plans based on what it learns about climate change impacts in this park.

10. **Commercial Services and Extent Necessary Determination**

As stated earlier, DCC opposes new provisions for commercial guided activities in Denali Wilderness during winter/shoulder seasons. Particularly, we note that the 2006 Backcountry Management Plan states that commercial activities which "could be authorized" include "Winter day- or multi-day trips by ski or snowshoe *in the park additions and preserve*" {emphasis added}. The specific omission of the Denali Wilderness seems to imply that these activities are not to be considered for this area.

We also note that to be determined "necessary and appropriate" any proposed commercial activities must meet the stringent, more detailed criteria laid out in the BCMP. These are:

- a. They depend on the unique character and environment of the Denali backcountry, and the same experience cannot be found on nearby public lands.
- b. They are consistent with the purposes of the park and preserve as described in chapter 1.
- c. They do one of the following:
 - i. They provide access to remote areas of the park and preserve where the time or equipment necessary for the independent traveler to reach those locations would otherwise be prohibitively lengthy or expensive.
 - ii. They provide education and inspiration related to wilderness resources and values.
 - iii. They assist visitors in exploring the backcountry in areas or by means that require specialized knowledge (e.g., mountaineering, dog mushing).



We hope that NPS stringently applies these criteria to any new offering in the Denali backcountry, and we intend to challenge any proposed commercial activity that does not.

Currently there is a mushing concessioner providing adequate overnight services, with the possibility of another mushing concession, currently unfilled.

Under the Preferred Alternative, commercial tour buses could operate as far as Mt. Vista in winter without an E.N.D. No provision has been made for commercial transportation access to Teklanika during shoulder seasons, before the concessioner begins to operate transportation. The possibility of a commercial shuttle to meet this need during shoulder seasons would mean backpackers could leave their car at Headquarters.

Educational offerings by Alaska Geographic or other nonprofit park partners could occur in Winter/Shoulder Seasons and may be authorized now, without the need for an E.N.D.

It will be important for commercial users to accurately interpret national park messages and themes. This could be difficult if many different operators are authorized to transport to Mt. Vista. Having rangers present at this rest stop to help provide education to park guests is a productive idea.

Thank you for the opportunity to provide comments and ideas. For clarification you may contact us at mail@denalicitizens.org

Sincerely,

Nancy Bale, Steve Carwile, Nan Eagleson, Charlie Loeb, Hannah Ragland