



# Denali Citizens Council

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Acting Superintendent Brooke Merrell  
Denali National Park and Preserve  
PO Box 9  
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February 13, 2022

Dear Acting Superintendent Merrell,

On behalf of the board and members of the Denali Citizens Council, we would like to thank the National Park Service planning team for the opportunity to be involved with preparation of the Polychrome Improvements Environmental Assessment. We understand that the National Park Service (NPS) was forced to close the Denali Park Road (the road) at MP 45.4 in September 2021, because of ongoing slumping caused by a rock glacier at the site. Given the increases in slumping over the past few years, and heavy rains in late summer 2021, NPS managers determined that they could not keep the road passable over that roughly 350-foot section in the path of the rock glacier. We have been told that since then the road has slumped 30 feet or more and that NPS has said it will be unable to use fill from park gravel sources to maintain the roadway, going forward.

We understand that this EA contains an Action Alternative intended to solve the access problem. We know that it is being conducted with an accelerated timeline, in time to secure contracts and begin to restore access to the entire 90+ mile Denali Park Road starting in summer 2022. As part of the decision to take action, NPS has done a great deal of background work and the agency considered and dismissed several potential alternatives other than the single proposed action. The selected alternative seeks to retain the existing road as much as possible over Polychrome (the mainline alternative) rather than to build an expensive and time-consuming alternative either below Polychrome or behind it. We support the mainline alternative as having the least amount of impact to park resources, including Wilderness. However, we do wish there had been better access to the information used to eliminate those other alternatives, and that NPS had provided more extensive analysis of the most promising alternative in the EA so that the benefits of the preferred alternative could be clearly seen.

Our comments below are meant to assist NPS in developing a meaningful analysis of this necessary project, and to provide suggestions for additional monitoring and mitigation where we feel they are needed. In addition, we know that contractors may choose to conduct additional or different activities to complete this

action, based on their expertise, and that a supplemental EA may be necessary if these activities go beyond the scope of this EA.

Our comments will cover elements of the EA in order:

## 1. Purpose and Need

We understand that a repair of the Denali Park Road to provide public access (as well as access for scientific inquiry) is of the highest priority. We understand that the “mainline” option can be conducted in the least amount of time and with the least impact to park resources. However, we have to question whether continuing the “mainline” option is sustainable in the long term. A warming climate will continue to change the dynamics of the park road, especially on slopes with southern exposure, such as Polychrome. Although the board and members of DCC would not be pleased with an eventual solution that takes the road off Polychrome entirely (with its associated very damaging impacts on Wilderness and park resources), we can foresee that it may become necessary, in order to maintain safe access, sometime in the future. It is this unknown future that influenced NPS to tell us, when we asked, that the Service would not prepare a long-term plan for road repair and maintenance in a climate change scenario. It is just so hard to predict and prioritize projects very far into the future.

## 2. Alternatives

- a. The **No Action** alternative in this EA is not the status quo, but in fact an Action, a decision made by NPS **not to fill the slump** seasonally. Shouldn't there be a **No Action** alternative that continues the slump filling? We do understand that approximately 16,000 CY of material were used in 2021 to keep the road drivable. Is it no longer possible to generate this amount of gravel and keep up with general road maintenance if the status quo (the true **No Action**) is maintained? If the No Action alternative cannot include filling the slump, NPS should provide additional background regarding exhaustion of gravel sources or other factors that make this untenable. We would like to see numbers.
  
- b. The EA has only one **Action Alternative**, having considered and eliminated other possibilities. It is said that the other mainline access option, slope excavation, could never reach competent bedrock and would only have a 15-year life, but that a bridge could be safely placed and would have a 50-year life. However, the bridge's lifespan was qualified somewhat in the text of the EA, p. 16: “Additional maintenance projects to retrofit the bridge may be needed in response to climate change....design considerations to address the possibility of melting permafrost under the bridge abutments.... would be researched and evaluated...” We must conclude that the Action Alternative, while perhaps the most

viable, is not without potential longevity problems.

### 3. Issues selected for detailed Analysis (our suggestions)

#### a. Geology

We are concerned regarding loosely-described plans to blast, excavate and overboard ~150,000 cy of material, in Phase 1, from the rock slopes east-west of the bridge, in order to reroute the road to provide a more workable turning radius for buses.

#### **Our suggestions are as follows:**

- i. Minimize evidence of blasting cores or other artifacts of blasting.
- ii. On the western excavated slope, do not use a proposed bench cut that must be periodically maintained, unless no other feasible alternative can be developed. Plan to accommodate rock fall with a catchment ditch next to the road. This suggestion is made in Alternative 3 of the Minimum Requirements Analysis, Appendix E, p.24, which was selected by NPS as the one with least impacts to Wilderness.
- iii. Rock scaling on natural slopes has only been conducted once in Denali National Park, on the bluffs adjacent to the Toklat River. Road design standards and philosophy have always supported leaving the slopes alone. We have seen no clear evidence that rock scaling was necessary or successful at Toklat and that it will be so during this proposed road project. If catchment ditches can accomplish what rock scaling is proposed to do, we support them. For any rock scaling project, we request that the EA provide greater detail on the justification for it (slope angle? running water concerns? is scaling appropriate in a 'landslide' area?), and provide evidence that it will be successful over time.
- iv. Rock bolting – We oppose rock bolting and support Alternative 3 in the Minimum Requirements Analysis, Appendix E, p. 24-25, which stipulates no rock bolting in Wilderness. Even within the non-Wilderness road corridor, we oppose rock bolting.
- v. Retaining walls – We support the stipulations of Alternative 3 in the Minimum Requirements Analysis, Appendix E, p. 37, which state “Design the retaining walls near the east abutment, Perlite Landslide and Bear Cave Landslide to be as unobtrusive as possible (e.g., use natural materials, bury walls if possible).”
- vi. Blasting and pile driving, even if a temporary impact, will be of much greater magnitude during this project than at any time in the history of the park road. The EA should provide more information regarding how noisy activities will be conducted and controlled - the number of blasts per day, relative noise and seismic disturbance from the blasts, etc. Confine blasting

activities to a certain set of hours, to avoid disturbance to both wildlife and human backcountry users at nighttime.

- vii. Over-boarding and bull-dozing of rock. It is not clear to us that all the possible production from blasting during Phase 1 can safely be over-boarded at the site. The EA should provide additional alternatives for placement or storage of over-boarded rock. Can it be over-boarded laterally, near Perlite? A best-case scenario would be to transport usable rock to Toklat for crushing and re-use on the road. NPS should further analyze the safety concerns associated with sending bulldozers down the slope below the road to move and reshape the over-boarded rock. Alternative 3, selected in the NPS Minimum Requirements Analysis, states “Store or use as much excavated material as possible outside of wilderness areas.” (Appendix E, p. 37)
- viii. We question the need for pavement approaches to the bridge. They have not proven necessary elsewhere along the park road, and we wonder why they are needed here. There is certainly no other use of asphalt along the park road, so asphalt approaches would be particularly out of character for the park road. Use of an asphalt plant on site would generate additional construction impacts – are these paved approaches really needed?
- ix. Bear Cave –  
This project (Phase II) would, according to the EA, be conducted after the initial remediation at Pretty Rocks, perhaps not until 2024 at the earliest. We are aware that the Bear Cave project, a retaining wall to support the park road where a slump below the road may threaten its integrity, has only been “conceptually” studied and may be changed or possibly not conducted. Although we were told that this EA would consider the entire suite of possible impacts from the Bear Cave project, we are aware that the exact engineering needs and stipulations will not be developed for a few years. We support all mitigations currently prescribed for this project, including the burying of any retaining walls and mitigation of wetlands impacts. We also question any rock scaling that may have been described for Phase II (see our comments above). We expect additional NEPA compliance when a clearer design for Bear Cave has been developed.

## **b. Wildlife**

It is clear that wildlife will be disturbed between MP 43 and 46 during this project. Our suggestions for mitigations appear below.

- i. “If ground disturbing activities were conducted during bird breeding and nesting season, measures would be implemented to avoid disturbance to active nests” (EA). Our suggestions:

- Be more specific about the nature and severity of the ground disturbing activities. For example, it is possible that additional hiking in this area (because of Transit bus turnaround at East Fork Bridge) could be as impactful to bird and mammal populations as some of the construction activities.
  - Specify the “measures” needed to avoid disturbance.
  - Set up robust, funded monitoring, with accountability ensured.
  - We understand that the construction season is expected to run from April - October. This may not be the case in 2022, but will certainly be so in 2023 and perhaps 2024. How, specifically, will the project mitigate effects to bird mating and nesting activities and sheep lambing early in the season (May-June)?
- ii. “Migratory Bird Treaty Act”
- The EA should provide more information on existing Eagle Nests in the area of impact of this project.
- iii. “Construction would halt when certain wildlife are within limits established in CFR 13.920”
- Specify in the EA a robust monitoring program. We know that monitors are already required under the Migratory Bird permit. We ask that NPS add wildlife monitors. We believe these monitors should be independent, not employed directly by the contractor, and that they be given the authority to shut down project activities if wildlife is near.
- iv. Habitat – The EA should propose that a wildlife biology crew perform a study during the first season of the project (May-June 2022) to assess the Polychrome area adjacent to proposed construction sites (use the *Area of Potential Effects mapped in the NHPA Section 106 Analysis* as your study area), to determine specifics of local wildlife populations, their routes, and mark the areas of habitat they are specifically using. Wildlife, including birds and both small and large mammals, should be tracked and counted, along with nesting areas, routes of movement and areas of importance to them. The data gathered in this survey can inform the Service with more recent and relevant information on wildlife in the project area of impact. Otherwise, this EA is largely imprecise and speculative about impacts to wildlife.
- v. Sheep and caribou activities and movements - We argue that the impact to these large mammals of a 3-5 year set of projects will not be minimal, at least in part because they use the road regularly. We would like the EA to address this less-than-minimal impact through creative monitoring and activity planning. We are concerned that a 3–5-year project could cause some abandonment of the area by both birds and mammals. After the project is finished, the bridge could affect wildlife movements for those large mammals that have been known to use the road as a transit corridor.

- vi. The road closure period is an ideal opportunity for NPS to conduct baseline studies of wildlife on and near the road west of the closure. The EA should stipulate such a study in the Action Alternative, as it will provide important information for continued implementation of the NPS Vehicle Management Plan.

**c. Visual Resources**

- i. Restore blasted slopes west of the proposed bridge, during Phase 1, to a natural state, as closely as possible, avoid the bench cut, use a catchment ditch at road level only, and obscure evidence of blasting.
- ii. There is no drawing or computerized rendering in the EA that shows what the proposed “bench cut” would actually look like from the bridge, making it difficult to assess what its visual impact would actually be.
- iii. Make every effort to retain the rock nob at the eastern bridge abutment, which provides visitors with a visual resource and perch for animals to be viewed right next to the road.
- iv. Remove blasted rock from the site whenever feasible and store at Toklat Road Camp, for crushing and use on the road.

**d. Wilderness**

We support the specifications of Alternative 3 in the Wilderness Act Minimum Requirements Analysis, attached to this EA. Beyond the recommendations in Alternative 3, we additionally ask that rock scaling not be conducted on natural slopes without additional guidelines and proofs that it is necessary. We ask that construction and rehabilitation of the temporary platform described in the EA on page 1, be more thoroughly detailed in the EA, since it will be in Wilderness.

**See Alternative 3 stipulations, quoted below, Appendix E, p. 37 for reference**

- 1. Consultation and coordination with the National Historic Preservation Act Section 106 coordinator and Backcountry Information Center to ensure cultural resources protection and backcountry user safety.*
- 2. Recontour and/or revegetate all excavation and construction areas.*
- 3. Design the retaining walls near the east abutment, Perlite Landslide and Bear Cave Landslide to be as visually unintrusive as possible (e.g., use natural materials, bury walls if possible).*
- 4. Revegetate any areas impacted by construction with native species/tundra mats.*

5. *Implement biological mitigation measures stated in the Environmental Assessment (monitoring, construction timing, invasive species equipment checks) to reduce impacts to the natural quality.*
6. *Limit blasting and any other loud activities to occur between 8 a.m. and 8 p.m. to limit disruptions to overnight wilderness recreationists.*
7. *Require shielding on construction lighting to eliminate light trespass. Fully shielded lights should illuminate the work area without allowing light to shine upward, sideways, or backward outside the work zone.*
8. *Bridge color should be nonreflective and a neutral color to blend in with the existing colors of the landslide to the extent feasible. The final appearance would be approved by NPS in consultation with the Bureau of Land Management standard environmental color chart.*
9. *Conduct bridge assembly outside of the wilderness area.*
10. *Design all elements of the project to be as unobtrusive as possible.*
11. *Implement measures to protect the vegetation from damage by heavy machinery and vehicles.*
12. *Store or use as much excavated material as possible outside of wilderness areas.*

#### **e. Visitor Use and Enjoyment**

- i. The intention of NPS to operate a full complement of Tour and Transit buses up to MP 43 during the closure period is a direct consequence of the Actions in this EA, and therefore must be considered in this EA. The impacts of this decision upon visitor experience will be significant for people who may only be visiting Denali during the period of closure. The Vehicle Transportation System must continue to operate under indicators and standards of the Vehicle Management Plan. The ability of NPS to monitor and enforce VMP standards may be reduced because of residual staffing shortages related to Covid-19 and competing management concerns. The EA needs to acknowledge the importance of maintaining a high standard of VMP enforcement and to provide a framework for ensuring that standards will be closely monitored, in order to ensure a high quality of visitor experience.
- ii. Denali Backcountry Plan guidelines need to be enforced. Hiking off the park road from certain key trailheads along the first 43 miles of the road should be monitored for overuse and formation of social trails. Impacts in Igloo Canyon, at Primrose, and emanating from the Transit turnaround at MP 43 (East Fork Bridge) require monitoring and analysis throughout the period of road closure. Although day hiking is not currently subject to registration, this possibility is covered in

the Backcountry Management Plan. During the closure, it may be necessary to control day hiking through registration.

- iii. Construction worker guidelines must be stipulated in the EA. Workers are planned to be housed both at Igloo pit and campground, and possibly at Teklanika pit. The EA needs to provide stipulations on how the impact of worker housing and use of the road will be mitigated (for example, housing guidelines, use of generators, transportation timing considerations).
- iv. Impacts at East Fork. Because Tour will be stopping there, impacts that include wildlife encounters, trampling of vegetation, and formation of social trails need addressing. We know this is not considered a direct impact of the Polychrome Improvements proposals, but we argue that it really is.
- v. Meeting with the public. We've been told that public information meetings regarding how the park will manage transportation and visitation in 2022 are scheduled for March 2022. We appreciate the opportunity to provide input at these meetings, in addition to seeing mitigations of impacts to visitor experience along the regulated portion of the park road in the EA and FONSI.

The DCC Board appreciates your openness to continued dialogue during this unprecedented time in the history of Denali National Park. We feel that this closure provides both challenges and opportunities to NPS managers at Denali. We look forward to continued discourse with you regarding our concerns.

**DCC Board** Nancy Bale, Steve Carwile, Nan Eagleson, Charlie Loeb, Nancy Russell

cc. Jakara Hubbard