

July 9, 2009

Dear Superintendent Anderson,

On behalf of the board of directors and members of the Denali Citizens Council, I am pleased to make the following comments regarding the EA for Safety Improvements to Mile 73-84 of the Denali Park Road.

Denali Citizens Council, founded in 1974 in Cantwell, has provided a grassroots perspective regarding national park issues since that time. Many of our members are long term employees and local residents, and have watched three decades of unprecedented growth in infrastructure development and visitation, both within the park and in its neighboring communities. In light of this growth, the National Park mandate to protect resources while allowing reasonable access is as pertinent as it was almost a century ago.

The section of road between Eielson and Wonder Lake provides profound and unique elements of the sub arctic – breathtaking views of the Alaska Range and the McKinley River, rolling tundra landscapes rich in wildflowers and berries, tundra ponds filled with a diversity of ducks in addition to beavers and the occasional moose. It invites visitors to stop and experience the environment, take off on a hike to nearby scenic viewpoints such as Mt. Galen, pick berries, scope the ponds. At the same time the road is a major transportation corridor for now four private Kantishna tourism businesses, and for NPS shuttle visitors heading for hikes or campouts at Wonder Lake and beyond. Now a “tour” to the Fanny Quigley cabin is also offered by NPS.

This issue of *protecting resources while allowing access* has special significance with respect to the current EA. The Denali Park Road is at the same time a protected resource and an access corridor - the dilemma of how to protect its unique character while also allowing adequate access is central to the actions proposed in this EA. DCC members have, through the years, been deeply concerned with protecting the unique character of the road. We have supported limits to access along the road, in order to protect not only road character, but the unique wilderness visitor experience. We have supported the road character definition as presented in the Entrance Area and Road Corridor EIS of 1997, the one that argues that the road should taper from a two lane road to a one lane road with passing pullouts west of Teklanika.

DCC supports the road character definition and Design Standards as written

The character of the park road and how it should look and feel are laid out in the Entrance Area and Road Corridor EIS of 1997, as follows:

“As visitors travel west into the park, they experience a transition in environment from urban to rustic to primitive. The road itself is part of this transition.

The first 15 miles of road, to Savage River, is a dual purpose facility. It must efficiently handle large volumes of traffic traveling in and out of the park and between various facilities in the entrance area...

The next segment of the road, between the Savage and Teklanika Rivers, is a transition zone. The driving surface changes from pavement to gravel. Efficient traffic flow is not the only function of the road; allowing the visitor to experience the landscape is of increasing importance...

DCC Board

Nancy Bale
Anne Beaulaurier
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West of the Teklanika River, the landscape and the road change. Rolling terrain gives way to steep mountains and rugged canyons. The park road changes from a uniform width, two-lane facility to a variable width one-lane road with two-lane sections and pullouts. At this point, the landscape and the character of the road become integral parts of the park experience. The sinuous path emphasizes the dramatic terrain. Engineered structures such as bridges are used only as necessary to protect the resource or preserve the road. Signs and related items are kept to a minimum. The character of the road is in keeping with the character of the land: a primitive, low-speed road locate din a wild and pristine land.”

Draft Entrance Area and Road CorridorDCP/EIS June 1996

We support the principles of road design that flow from this definition. In particular, the Road Design Standards, 2007, list crucial factors, below:

Crucial Factors in Maintaining Road Character (page 2)

The continued preservation of the unique character of the Denali Park road and the visitor experience it provides depends on the following four interrelated factors. Compromising or eliminating any one of these crucial factors from the road standards will result in that factor driving a change to the character of the park road and visitor experience.

- 1. Safety will be an integral component of road character. Denali National Park staff will strive to repair and maintain road structure within the standards outlined in this document to support the chosen design vehicle and provide safe passing situations through a series of intervisible passing pullouts.*
- 2. Visitor transportation vehicles of all road users will be limited to a design vehicle size that can safely travel the existing park road and that the road can structurally support.*
- 3. The number of vehicles using the park road will continue to be limited by the park’s general management plan and regulations implemented in June 2000.*
- 4. Rules of the Road, which allow safe meeting and passing of vehicles and which were referenced in the June 19, 2000 Special Regulations will continue to be in effect.*

And, under

Guidelines for Road Design Standards (page 3)

- 4. Sufficient minimum roadway surface width, intervisible passing pullout location/geometry and sufficient stability in the road structure to allow safe travel, meeting and passing of two design vehicles during the visitor season all along the park road. This guideline takes into account the fact that road stability is highly variable during the year because of subgrade moisture and frost, which limit the season during which safe structural stability is obtainable.*
- 5. West of Teklanika River, the park road changes from a uniform width, two-lane facility to a variable width one-lane road with two-lane sections and intervisible pullouts that are easily reachable by vehicles in a yielding situation.*

These two documents stand as the planning baseline for any actions by NPS to correct road design deficiencies. As such, they support the continuation of the Eielson-Wonder Lake section of road as basically a one lane road (whose width is no less than 16 feet wide), with sufficient pullouts to make it safe for drivers to anticipate when they will next yield to another bus, using the Rules of the Road.

We support this design of basically a one lane road with intervisible pullouts. Such a design is in line with planning intent and is the minimum needed to accomplish the goal of safety. In addition, such a design will result in the minimum use of materials and create the minimum impact upon the landscape of the road (by either the influence of cuts or fill slopes on the landscape).

Our Comments and Concerns

Why not at least one less extensive alternative?

DCC is supportive of changes to promote safety. We support the testimony of both users and NPS road employees that there is too much “passing in the ditch” and that too many accidents occur on just this section of the road.

However, this \$6 million project is huge (with no other, **more gently** phased alternatives) and there is very little detail as to why **this one alternative** is the best way to promote safety while protecting and maintaining road character. Certainly we would have appreciated one or two less extensive alternatives, but they are not there. And why? No adequate explanation is really given.

In the section, **Alternatives Considered and Eliminated**, there are positive elements in each alternative that could be combined to produce another alternative as follows:

1. **Rehabilitate former accident sites and the 20 sites identified in 2004 using pullouts and edge strengthening. Use reduced speed between pullouts to extend sight distance.** Keep other elements of Alt 2, including crowning, reconditioning, edge strengthening, road protection device at the beaver pond, superelevations of curves, all would be done. Only the number of pullouts would change. This alternative could be adopted as a phased approach, with evaluation of driving safety to be performed over a period of years, to determine if additional pullouts are warranted. There are many sections of the park road where there are not fully intervisible pullouts and yet safe traffic passage occurs. Speed, driver knowledge, and correct application of the Rules of the Road enhance safety there and can do so in this situation as well.

Other ways to change the preferred alternative (2) could include:

1. **Change the preferred alternative to consider different pullout dimensions.**
Do the tapers need to be as gradual as depicted? Can the pullouts be shorter and still do their job? Does the belly of the pullout need to be 60 feet long? Could it be 40 feet long and still provide a safe stopping area for a bus? Will these extra long pullouts (up to 220 feet) actually encourage moving passing?
2. **Change the preferred alternative to include more parking pullouts**
It is assumed that the 73 pullouts are for passing and not for parking. Perhaps a few should be marked or designated as suitable for parking. Otherwise, the benefit of this engineering project is for moving traffic with little benefit or encouragement of stopping, letting out passengers for enjoyment of the landscape, then moving on. Although designated parking pullouts always have their attendant problems of visitor impact to the surrounding tundra, if the construction of the road facilitates only moving traffic, it will ultimately support a higher speed road where buses tend to execute moving passes and where it is clear that the purpose of the road is access (and frequent dusting of visitors), not a slow progression through a user-friendly landscape. If bus drivers know to expect standing or walking tourists along the widened roadway, they will drive accordingly. Having stopping and parking pullouts will thus tend to calm traffic.

Is the use of stimulus funds for this project creating unintended rigidity?

We recently heard that Federal Department of Transportation stimulus funds have been secured for this project. Aren't these funds available only for “shovel ready” projects? Only recently were final drawings available for this project, and it is our supposition that the money was applied for before the final design was in hand. Is this true? We need a little more detail on why NPS considered this project eligible for stimulus monies.

In addition, if we were able to convince NPS, during this EA process, that a phased approach, incorporating some features of this design, but providing room to adjust dimensions and numbers of pullouts, would this change be eligible for incorporation into the currently funded project?

In other words, can the design features published in this EA really be changed and still qualify for the funds that have been secured? Or, is the design a funded, determined, written-in-stone project with little room for public input on design features or project phasing?

Why not more consideration of environmental consequences?

We are not happy with the failure of this EA to adequately predict cumulative impacts from these engineering changes to the park road between Eielson and Wonder Lake. Examples are provided below:

1. **Traffic loading** - Although no one at NPS has been able to tell me exactly how much in the way of “safety improvements” must occur before the “design vehicle” (as described in the Road Design Standards of 2007) would be permitted to drive to Wonder Lake, this project is likely to open the road to more traffic, and at least render inevitable the completion of design changes that could open the road to additional concessioner traffic. It is a well known fact of highway design that “if you build it they will come.” This EA needs to provide some proactive language regarding the need for control of traffic. This could include, for instance, a consideration of the recommendations of the Denali Task Force of 1994 to end “day use” of the road for lunch tours by private lodges.
2. **Enforcement** - Will enforcement of the rules of the road become problematic with a newly engineered surface? Will buses park in the passing pullouts in order to go on treks? Will there need to be more signage? More patrols? Will moving passing become a problem?
3. **Speed** – How will speed be retained at 35 MPH (or less) in this section? Speed is as much a contributor to road character as design, as has been pointed out. A road with many passing pullouts may be safer, but it is likely to be a faster road. What about bicyclers, hikers, road walkers? Although speeding is already a problem with some drivers, and may in many cases contribute as much to lack of safety as the current road design, the problem of speeding will inevitably be compounded by the effective widening introduced here.
4. **Stopping** – Are more passing pullouts serving only the moving bus rider, not the interested tourist with binoculars and hiking boots? Are there enough opportunities for a bus to safely park and let out passengers for a few minutes of pictures or use of the spotting scope?
5. **The future of Kantishna** – Kantishna has been identified in the Backcountry Plan as a “blue zone,” meant to have lower impacts from visitor use. The DCC vision for Kantishna is that it remain a rural, low key destination, where visitors feel the presence of wild nature. Impacts of increased traffic and access upon this area must be considered as a consequence of road design changes.

Thank you for the opportunity to provide comment. As always, these comments do take time and consideration, phone calls, questions and networking with other stakeholders. We, as any constituent organization, want to feel that an EA is actually a sort of decision document, not a formulaic activity meant to satisfy certain legal requirements. Although NPS has decided not to hold public meetings or extend the comment period, I know that there are many DCC members with deep concerns regarding this project. The fact that the project is already funded makes the exercise just gone through on the last several pages seem a bit useless. Nevertheless, we urge NPS to consider carefully our comments.

Sincerely,

