

# STATE OF ALASKA

## CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

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October 31, 2011

Miriam Valentine  
Park Planner  
Denali National Park & Preserve  
P.O. Box 588  
Talkeetna, Alaska 99676

Dear Ms. Valentine:

The Citizens' Advisory Commission on Federal Areas reviewed the Denali Park Road Draft Vehicle Management Plan and Environmental Impact Statement. We offer the following comments for consideration in finalizing the plan to manage traffic on the park road.

### Vehicle Use Levels

The draft plan asserts that while the existing seasonal limit of 10,512 vehicles established by the 1986 General Management Plan (GMP) is clearly measurable, a numerical limit alone may not be the best approach for managing use of the park road. The plan proposes to set measurable indicators and standards intended to protect park resources and values along the road corridor under an adaptive management approach. This adaptive management and monitoring strategy is detailed in Appendix C.

The plan should note that the current 10,512 vehicle limit is the result of a phased reduction of the 1984 use level of 12,661 vehicles. This reduction, implemented as part of the 1986 GMP, included a planned 20% increase in tour and shuttle bus numbers and a 45% decrease in the number of private vehicles.

While we agree that a numerical limit alone may not be the best approach for managing vehicle use, we are not convinced that impacts arising from the current system are of sufficient magnitude to warrant extensive changes to the existing road management strategy or in use levels. However, in order for this commission and the public to objectively assess the potential benefits of the proposed management and monitoring

strategy versus the current fixed numerical limit, more information is required. Little or no information is presented on the actual number of vehicles, by various type – bus, private vehicle, administrative vehicle, or vehicles transporting lodge visitors- that travel the park road throughout the season.

For example, Table 7 on page 93 lists the number of recreation visitors each year from 2005 through 2010. These numbers are broken down into 4 different categories – bus riders, lodge visitors, entrance area visitors and visitors in private vehicles past the Savage checkpoint. The table contains no information on the actual number of vehicles under each category traveling the park road during those years. Consequently, we cannot determine from the plan if use levels for the 2005-2010 period ever reached the limit of 10,512 vehicles limit or if they were at lower levels in some or all of the years. We believe it is safe to assume that traffic levels never exceeded the seasonal limit, but figures showing actual vehicle use should be provided.

There are other problems with the data presented in Table 7. The first is the recreational visitor numbers for 2010, which, according to footnote #2, were compiled using an adjusted methodology that produced an increase in total recreation numbers of approximately 8-10%. No further explanation is provided. Nor does the plan discuss how this relates to the number or types of vehicles on the park road.

The second problem is that the recreational visitor use numbers in Table 7 include the shoulder season even though management of vehicles during the shoulder season was not considered because they were determined to be outside the scope of this draft plan. (pg. 83) The result is an inflated figure that does not reflect use levels during the allocation season.

While we understand that once fully implemented the proposed adoptive management strategy is not designed to be tied to a fixed limit on vehicle use levels, it is important to define a “starting” point for that strategy. We know that the 10,512 limit is the maximum number allowed under the current allocation system. We also know that actual total use levels vary from year to year and also by vehicle type. What we don’t know is the actual use levels for each year since the existing limit was established. This is readily available data and should be provided.

Need for this information is demonstrated by the four tiered structure of the proposed management strategy. According to the information in Appendix C *Adaptive Management and Monitoring Strategy for the Vehicle Management Plan and EIS*, “The first tier includes a set of indicators with quantitative standards associated with them designed primarily to regulate the numbers of vehicles on the park road in such a way that natural resources are protected and the visitor experience is preserved.” (Appendix C, pg.1) Under Tier 1 of the strategy, the plan (Appendix C, pg. 3) states: “These indicators and their associated standards will initially limit traffic volumes on the park road, though further limitations may result from the higher-tiered parameters.” Does this mean that traffic volumes will be reduced from the current 10,512 limit or from the actual traffic volume? No explanation is given for why current traffic volume would have to be

reduced to develop the quantitative standards in Tier 1. Consequently, it is not possible to determine if an initial reduction is necessary under Tier 1.

We suggest that the final plan include a revised table or tables that include the following for each allocation season since adoption of the current system: 1) total seasonal recreational visitors during the allocation season; 2) number of non-recreational users; 3) vehicle allocation by type; 4) total number of vehicles by type (including non-recreational users) actually using the road during the allocation season; 5) total number, by year, of vehicles using the road during the non-allocation season; and average number of vehicle by type for each year.

### Teklanika Campground

Future plans for this campground need to be clarified. In Table 3 – *Summary of Alternative Elements*- (pg. 65) under Alternative B it states: “If needed, Teklanika River Campground would phase in a tents-only campground over a 10 year period with visitors using the transportation system for access.” Similar statements are made in Chapter 4 - *Environmental Consequences*- on pg. 175: “Alternative B also proposes a potential change to.....Teklanika River Campground. Over a 10 year period, this campground could become a tents only campground..” and on pg. 184: “Within 10 years, Teklanika river could become a tents only campground..”

Elsewhere in the discussion of environmental consequences, the EIS (pg. 194) clearly states that Teklanika campground “would phase into a tents only camping area within 10 years of plan implementation.” Similar statements indicating the closure of the campground to recreational vehicle users are found on pages 210, 211, 224 and 232. The final plan should clarify future plans for recreational vehicle camping at this campground.

We understand that the proposal to phase out recreational vehicle camping at Teklanika is intended to reduce the number of private vehicles traveling past the Savage checkpoint. This is not a new proposal, as it was included in the 1986 GMP. Unfortunately, the plan contains no information on the number of recreational vehicles that stay at this campground during an average year. Consequently, it is impossible to determine how much POV traffic would be reduced by eliminating this use and how many park visitors would be directly affected by disallowing recreational vehicle use.

We do not support the closure of the Teklanika Campground to recreational vehicles under any of the alternatives. Thousands of visitors travel to Alaska each year via recreational vehicles. Many of them will visit Denali National Park and should be afforded the opportunity to stay in the park in their recreational vehicles without being limited to the entrance area. The limited number of campground permits available to recreational vehicle users, as well as the current restrictions requiring a minimum 3 day stay and which do not permit travel past the Teklanika campground are adequate to protect park resources, while still providing camping opportunities for this segment of the visiting public.

### Inholder Access

Under Alternatives B and C, the plan proposes to issue commercial authorizations to those lodge or business operators in Kantishna who currently provide day tours. These day tours are now conducted under the allocated road permits which provide for inholder access under ANILCA Section 1110(b). The reason given for this proposed change is that “Conducting commercial activity in the park outside the boundary of the inholding is not provided by Section 1110(b).” (pg. 46) While some form of separate commercial authorization may be considered necessary, it is essential that the NPS continue to recognize the guarantee of access to all park inholdings “for economic and other purposes” provided by ANILCA.

We are also concerned about the type of commercial authorization that could be required if either Alternative B or C is adopted. Day tours provided by the lodges in Kantishna are an important part of their business and should be allowed to continue. This can best be accomplished through issuance of a commercial use authorization rather than a competitively awarded concession contract. At the same time, the plan must contain enough flexibility to allow other property owners to develop businesses on their property or to take advantage of future economic opportunities using national park lands.

It is also important to note that of the current allocation of 1360 permits for access for Kantishna inholdings, only 1202 permits or roughly 90% of capacity are actually assigned. We understand that inholders requiring additional permits are not denied under the current allocation system. We are, however, concerned about the statement on page 184 that Kantishna inholder access may be “reallocated” to benefit the transportation (bus) system. This is particularly troubling in light of the longstanding NPS policy regarding Kantishna inholdings.

The 1986 GMP and Land Protection Plan included a planned reduction in the number of private inholdings in Kantishna to preclude future development of commercial visitor facilities and further reduce traffic demand. This strategy was reconfirmed in the 1997 *Final Entrance Area and Road Corridor Development Concept Plan* and most recently in a December 2010 letter from the Alaska Regional Office to a park inholder.

The allocation for Kantishna inholder access should not be reduced or permanently reallocated under any of the alternatives or under any adaptive management strategy. In addition, the potential for future increases in access needs for inholders must be recognized and provided for in the plan, consistent with the guarantee of access for economic and other purposes.

We also suggest that in order to avoid any confusion ANILCA Section 1110(b) be quoted in its entirety. (pg. 28)

The Commission appreciates the opportunity to comment on this plan. We also thank you and Superintendent Anderson for attending our October 27 meeting to discuss the plan, to answer questions and help members better understand the proposal. We

understand the importance of the Denali Park Road as a means for the visiting public to enjoy the wildlife and scenic resources of the park. We also recognize the need to manage use of the road in such a way that the public can continue to enjoy those resources. And finally, we encourage the development of a plan that will also protect the access rights and current and future economic opportunities of the businesses and property owners in Kantishna and elsewhere in the park.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Leaphart", with a long horizontal flourish extending to the right.

Stan Leaphart  
Executive Director

Cc: Sue Magee – State ANILCA Program