

# STATE OF ALASKA

**SEAN PARNELL, Governor**

## **ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting**

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October 27, 2011

Paul Anderson, Superintendent  
Denali National Park and Preserve  
P.O. Box 588  
Talkeetna, AK 99676

Dear Mr. Anderson:

The State of Alaska reviewed the Draft Denali Park Road Vehicle Management Plan and Environmental Impact Statement (DEIS). The following comments represent the consolidated views of the State's resource agencies.

The State appreciates the Service's efforts to anticipate and plan for increased visitation within the Park. While the Park Road vehicle limit of 10,512, established in the 1986 General Management Plan, has accommodated visitor use thus far, the number is largely arbitrary. We therefore also appreciate the objective to establish a science-based approach to vehicle management. Based on conversations with Park staff, it appears that the Service believes it will be able to increase overall access along the road while maintaining or improving visitor experience and protecting park resources. Unfortunately, this conclusion is not particularly obvious in the DEIS and we recommend additional explanation in the final EIS.

Based on our observations of the Denali Backcountry Plan, which also relies on a science-based approach, use of standards and indicators sometimes proves challenging. Unforeseen issues may arise during implementation, especially as visitation increases over time. We anticipate we will work with the Service on those and other routine implementation issues through the annual Compendium review process.

Tourism is one of Alaska's largest industries and Denali is a critical component to the State's tourism industry. The current transit system is well established and any changes that affect that system need to be carefully considered. For example, our understanding is a minimum of two years lead-time would be necessary for industry to respond to changes that result from monitoring efforts. We request the Service continue to work closely with tourism representatives on these issues to ensure the plan does not negatively affect the needs of this vital industry.

As you know, the State has a long-standing interest in both Kantishna and ensuring inholder access rights under ANILCA Section 1110(b) are honored on a statewide basis.

We support the continued viability of the lodges at Kantishna, which add a uniquely Alaskan dimension to the range of park experiences. While we agree with the plain statement on page 46 that “*Conducting commercial activity in the park outside the boundary of the inholding is not provided by Section 1110(b),*” the established pattern of private day tours provided by some of the Kantishna-based lodges has evolved over the years and is not necessarily cleanly outside the scope of ANILCA Section 1110(b) by virtue of recent history. The Service has openly accommodated this use for many years under the ANILCA inholder access provision and the resulting business model for some of these remote lodges appears dependent on this day use.

We therefore appreciate that the draft plan provides alternatives to continue day trips to Kantishna. The benefits of allowing this day use under one or more commercial use or concession operations could be substantial for all parties, including the ability to increase Kantishna day use. The resulting ability to coordinate the departure times with other bus trips could also reduce congestion and improve the experience of all passengers. We also appreciate that the Park has made a considerable effort to reach out to the affected lodge owners for solutions and we encourage these parties to work out an effective and mutually beneficial strategy.

We request the Service also carefully consider the likelihood that inholders would be successful in obtaining a concessions contract through the competitive bidding process. If there is a chance that the competitive process may eliminate the opportunity for inholders, we recommend instead permitting day tours with a commercial use authorization. The State supports a long-term solution that, at a minimum, provides inholders with continued levels of Kantishna day use.

### **Page-specific Comments**

Pages 28-29, Park Road Motor Vehicle Permits: The DEIS does not specify how the regulation would be revised under Alternative B or C. We request the final plan clarify how the seasonal vehicle allowance would be accounted for under adaptive management as compared to the current numerical limit.

Page 46, Actions Common to All Alternatives: We recommend that the final plan further clarify the intended distinction between day use for Kantishna lodges and access for “*overnight guests and travel necessary for operation of the inholding.*” In light of Alternatives B and C that would manage Kantishna day use as a commercial visitor use, an understanding of the basis for this distinction is important.

Pages 183-187, Transportation System and Traffic (Environmental Consequences): The only reference to Kantishna inholder access in this discussion is on page 184 regarding Alternative B. As with the page-specific comment for page 46, this reference should clarify what type of use “*may be reallocated.*” There is no reference to inholder access in the analysis for Alternative C. The final document needs to avoid the implication that the Park may arbitrarily take away “*adequate and feasible access*” under Section 1110(b) to benefit recreational visitors.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'M'.

Susan Magee  
ANILCA Program Coordinator

cc: Miriam Valentine, Denali Park Planner