

# STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

## OFFICE OF THE GOVERNOR

### OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

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April 10, 1992

John Morehead  
Regional Director  
National Park Service  
2525 Gambell Street, Room 107  
Anchorage, Alaska 99503

Dear Mr. Morehead:

The State of Alaska has reviewed the National Park Service (NPS) document titled Denali National Park and Preserve Alternatives Workbook for the South Slope Development Concept Plan (DCP). This letter represents the consolidated comments of the State's resource agencies.

#### OVERVIEW

The State of Alaska supports the goal of providing additional facilities for recreation and tourism in the area covered by this plan. The alternatives contain a number of proposals, e.g. visitor facilities, trailheads, waysides, that merit more detailed analysis in the up-coming environmental impact statement (EIS). As itemized below, the DCP/EIS will need to identify and address the full spectrum of alternatives and environmental and social impacts of these specific proposals on other current activities (e.g. mining, subsistence, sport hunting and fishing, access, and other local uses) before the State can support individual sites or projects.

Additionally, the State is pleased that there may be federal funds available for developing these facilities, particularly at a time when the State's budget is shrinking. On land outside the national park and preserve, the NPS should not expect that development costs (both direct and indirect) will be borne by State and private interests.

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The NPS will also need to closely cooperate with state agencies and the region's private landowners if the projected demands of future visitors are to be met.

#### VISITOR CENTERS

At the present time, we request that the EIS Preferred Alternative adopt the recommendations of the Denali State Park Master Plan (1989) for facilities within the state park. That plan was developed cooperatively with the NPS over a two year period with a great deal of public involvement and review. The plan provides for a visitor center at either of the two state park locations identified in Workbook Alternatives C and D.

The Hickel Administration has endorsed the concept of a major visitor center in Talkeetna. The Governor also supports a smaller visitor center within Denali State Park, although the State has not yet committed to a site preference. See attached January 24, 1992 letter from Governor Hickel to CIRI President Roy Huhndorf.

State officials intend to visit the area later this year for the purpose of selecting a preferred site within the state park. At the present time, however, the DCP/EIS should hold open the possibility that a small visitor center would be built at either the northern or southern site.

The State's historical position regarding location of visitor facilities has been for the federal agency to give preference to private landowners or locate them within the affected conservation system unit. In the case of Denali National Park and Preserve, Congress specifically excluded select areas from wilderness designations in order to allow development of visitor facilities. The NPS should consider the State's willingness to develop facilities on state land as an addition to, rather than a substitute for, developing federal and private lands to support the national park.

The proposed size of the smaller visitor center on state park land should be increased to approximately 4,000 - 6,000 square feet, rather than 2,000 - 4,000. (By comparison, the ground floor of the Eagle River Visitor Center in Chugach State Park is about 2,300 square feet.)

In addition, the DCP should consider environmentally sound development and operations methods for all facilities, such as energy efficient construction, low impact waste disposal and recycling.

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#### ANTICIPATING AND ADDRESSING IMPACTS

New visitor facilities on federal, state and private lands will have associated impacts and costs to the State, local governments, and local residents. While the State clearly supports the goal of providing facilities and other improvements for tourism and recreation, the impacts of new developments on existing uses (e.g. subsistence, mining, access) must be clearly identified and addressed during the EIS process to insure that they are fully understood and mitigated where possible. It is in both the State's and the NPS's interest to anticipate and identify possible impacts so that they can be fully addressed in the planning process. (Perhaps the NPS would find it worthwhile to offer technical/planning assistance to local communities who will be absorbing some of the impacts of increased visitor use.) If anticipated impacts are not acknowledged and addressed up front, the results of this planning process will be subject to delay and possible challenge, thus postponing implementation of critical aspects of the plan.

#### STATE LAND

Many of the proposals in the alternatives occur on state land. Proposals for trailheads and trails in Summit, Bull River, Petersville, and Chelatna Lake areas, waysides and adjacent land at Rabideux Creek, Talkeetna, and between Mile 162 and 201 on the Parks Highway, and proposed facilities within Denali State Park are all on state land. Each of these areas is covered by a state land management plan. The Chelatna Lake area is within the Susitna Basin Recreation Rivers Management Plan; the rest of the area in the Mat-Su Borough is in the Susitna Area Plan. Land north of the Mat-Su Borough is in the Tanana Basin Area Plan. Land in Denali State Park is covered by the Denali State Park Master Plan.

Actions on state land must be consistent with these plans. The NPS should reference these plans when developing specific proposals and refining the EIS. The NPS should also consult with the State regarding implementation requirements associated with any of the proposals on state land.

The Department of Natural Resources has published a report titled Scenic Resources Along the Parks Highway. This report inventories views along the Parks Highway and makes recommendations for protection and use of roadside areas. It is a valuable reference document which should be used when designing roadside facilities.

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#### STATE INVOLVEMENT

State involvement is critical in development of the draft EIS. Since many of the facilities proposed in the alternatives would be built on state lands, it makes little sense for the NPS to work on these proposals without actively involving and seeking agreement with appropriate state agencies. The DCP/EIS needs to make it clear that NPS can only make recommendations to the State about how it should manage state land; and that without State support, the proposals for state land and rights-of-way will never be realized.

The NPS should consult with all state agencies with an interest and/or responsibilities relative to south side developments. These include the Departments of Natural Resources, Fish and Game, Transportation and Public Facilities, Environmental Conservation, and Commerce and Economic Development. Outside the national park and preserve, the State's responsibilities and costs associated with planning, road design and maintenance, public safety, waste disposal, resource management, and water quality must be given primary consideration. It is critical that NPS work with all of these agencies in an effective manner. Informal consultation with one agency is not adequate state coordination. As the State's coordinating body, the Division of Governmental Coordination has been assigned to assist the NPS in ensuring adequate consultation with all appropriate state agencies. This Division will be contacting the NPS Chief of Planning to work out appropriate methods of effective multi-agency coordination.

The DCP/EIS also needs to be clear that even with State support for a given proposal, the mechanisms for implementation on state land are likely to be different than those used for federal land. For example, portions of trails on state lands may be managed differently than those on federal lands. If the State agrees to manage portions of the trails consistent with NPS proposals, it may require the State to establish a Special Use Area.

To provide for improved communication between NPS and the State for the duration of this project, and in recognition of the State's jurisdiction over many of the areas under consideration, the State requests more active involvement through an ongoing dialogue with NPS throughout the process, not just when a public review document is sent out for comment. The recent informal meetings held with state agencies hopefully marked a turning point in the NPS' efforts to increase dialogue with the State. However, such dialogue needs to occur in a more timely manner to allow effective participation in the planning process. (One of these meetings was held the same day printing of the Alternatives Workbook was scheduled to begin, thus decreasing the meeting's

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usefulness). To date, most consultation with the State has occurred after the NPS has already determined its preferred direction, which has significantly impeded cooperative planning between the State and the NPS. The NPS needs to understand that unless the NPS, the State and involved private landowners can mutually agree to a course of action, then this planning process will have been an exercise in futility.

#### FUNDING

The EIS needs to define how facilities proposed in the Workbook, including cabins, trailheads, waste disposal, boat landings, and wayside exhibits, will be funded, regardless of jurisdiction. This applies to the visitor center proposed for Denali State Park as well. It is the State's understanding that this visitor center would be jointly funded and operated by the State and federal governments. At this time, however, there is no State funding available for this purpose.

#### PREFERENCE FOR THE SITING OF VISITOR FACILITIES

Sections 1306 and 1307 of the Alaska National Interest Lands Conservation Act (ANILCA) directs NPS to give preference for providing services and facilities to local ANCSA corporations and other landowners. The State appreciates that the NPS is working with Cook Inlet Region Inc. on the Talkeetna visitor center alternative, and we urge NPS to provide similar opportunities for consultations with other ANCSA corporations and interested private landowners in the region.

#### MAINTENANCE AND LIABILITY

The EIS should address maintenance responsibilities and liability questions for trails and other facilities that are on state land. Before trails, cabins, sanitation or other facilities can be built on state land, these questions must be clearly addressed.

#### TRAILS IN MINING AREAS

Some of the trails proposed in the alternatives pass through active placer mining districts that are part of the Chulitna-Yentna mineral belt extending northeastward for 100 miles or more along the southern flank of the west-central Alaska Range. The creation of Denali State Park and the ANILCA addition of Denali parklands to the south closed a large portion of this mineral belt to mineral entry. However, the hardrock sources for the

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region's placer deposits have yet to be found and may lie in areas which are still open to mineral entry. Exploration and mining activity within the Chulitna-Yentna mineral belt began in the early 1900's, has continued to the present, and will likely experience additional mine development in the future. As described in more detail below, any new recreational developments such as trails and huts should be located to minimize impacts on existing and future mineral development.

The Petersville Road provides access to the Yentna Mining district. The Colorado Station Road provides access to the Chulitna mining district. Both of these access routes were pioneered and developed by the mining industry and are identified Revised Statute (RS) 2477 rights-of-way. With the construction and development of the Alaska Railroad, pioneer roads for mineral development were constructed from Talkeetna to access placer mines of the Petersville/Cache Creek area, and from Colorado Station to the Dunkel Mine and the Golden Zone Mine in the Chulitna District.

Development of recreational trailhead facilities on these original mining roads and trails can potentially impact existing and future mineral development and could result in pressure from special interest groups for additional mineral closures. Trails in areas with active mining and where ORV's and mechanized equipment are being used are not likely to be viewed positively by visitors desiring remote wilderness hiking opportunities. With increased public use, occurrences of vandalism and theft of mining equipment and facilities may be expected to increase, leading to additional costs for mine operators and claim owners.

In light of these concerns, the DCP/EIS should acknowledge and address these impacts, and make recommendations regarding the location and routing of trails and facilities to avoid existing mining claims and active mining or exploration areas. The EIS also needs to acknowledge that if future recreational use conflicts with mining, the result may be pressure to close additional mineral lands, with the subsequent loss of local employment and future mineral rent and royalty income to the State. Such a consequence can be avoided at this stage through appropriate planning to protect the mineral industry while providing for other land uses.

In addition to carefully locating trails to avoid existing and potential mining areas, the NPS should also consider working with interested claimants on willing seller acquisition. There may be claims in areas that are highly desirable for recreation that are owned by those who would be willing to sell out to the NPS. We are not aware of systematic efforts to contact individual claim owners who may be impacted by the Workbook proposals, and

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strongly encourage the NPS to locate and communicate with these claimants to find mutually-satisfactory solutions to potential conflicts. If this does not occur, it will be difficult, if not impossible, to effectively implement trail recommendations in the plan.

#### TRAIL CIRCULATION

The DCP/EIS should consider the possibility of linking trails to provide opportunities for longer backcountry hikes across the south slope area. Given the hydrology of the region, such cross-drainage trails would require a number of river crossings. While the cost of foot bridges would likely be prohibitive, cable crossings could provide a reasonable alternative and would be in keeping with historical crossings installed by local miners.

#### PRIVATE LAND AND INHOLDINGS

Like the discussion of mining claim impacts above, the DCP/EIS also needs to acknowledge and address other private lands that may be in the path of proposed developments. Some proposed waysides, trails, and trailheads are on existing private land, and the NPS should make an effort to contact these landowners as well. The EIS should also note that land acquisition may be necessary prior to construction, such as for the proposed trailhead and trail paralleling the west shore of the Chulitna River. In some instances, landowners may be willing to convey lands or easements for the proposed developments, or may have some valuable suggestions for avoiding impacts. If local landowners are not cooperative, then this is useful information as well. Without considering the details of land status and the desires of affected private landowners, the development proposals have little value.

Consistent with the National Environmental Policy Act and Sections 1306 and 1307 of the Alaska National Interest Lands Conservation Act, the NPS should also make sure that local private landowners and ANCSA corporations have had ample opportunities to propose alternative visitor developments on their land.

#### WAYSIDES

Most of the proposed highway pullouts, scenic and interpretive waysides, and trailheads occur along the Parks Highway. State agency representatives present at the December and January meetings with the NPS stated that there should be no developments

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which encourage people to stop along the road unless "comfort stations" are provided. The State cannot be expected to provide such facilities to serve increasing demands resulting from NPS waysides unless cooperative planning includes consideration of cooperative funding and maintenance.

While increasing roadside interpretive sites is a laudable goal, waysides and pullouts **without** appropriate toilet and garbage facilities is unacceptable. The lack of such facilities results in unsightly and unsanitary conditions. In particular, overflowing garbage cans attract bears and increase opportunities for undesirable bear/human contact. The NPS itself has undertaken an extensive program within Denali National Park and Preserve to educate the public and regulate activities (e.g. bear proof trash containers) to avoid unnecessary problems. Similar efforts will be needed along the Parks Highway.

The EIS needs to acknowledge land uses that occur, or are likely to occur, adjacent to proposed developments. For example, some proposed waysides are located adjacent to land identified in a state land use plan for possible sale to private individuals.

Facilities requiring pull-outs or other access along the state highway system should also be designed to meet State of Alaska design standards, e.g. sight distance, grades, and clear zones.

#### EXISTING USES

Existing recreation, sport and subsistence hunting, mining, and other uses in the vicinity of proposed developments require careful consideration. For example, use of existing trails involves pack animals and mechanized equipment in many locations. Such pre-existing uses need to be acknowledged and protected in the decision-making process. Increasing backcountry tourism in areas already subject to consumptive and mechanized uses frequently results in efforts to restrict previously existing uses. In the park and preserve, ANILCA specifically requires that traditional (pre-ANILCA) uses be maintained unless the continuation of these uses is shown to be detrimental. While some change will be inevitable during the planning process, the NPS should strive to minimize impacts on the full spectrum of traditional uses in the area.

#### PETERSVILLE ROAD TRAILHEAD

Alternatives B, C, and D propose a trailhead at the end (Mile 36) of the Petersville Road. After Mile 18.6, Petersville Road is a sub-standard road with ruts, sharp curves and steep drop-offs in



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many locations. This section of the road is limited to four wheel drive only during the summer. The State Department of Transportation and Public Facilities does not recommend the development of a trailhead at the end of this road until and unless the road has been upgraded for standard two wheel drive vehicles. If a trailhead is desired nonetheless, DOT/PF recommends that public information materials such as trail maps and road signs alert potential travellers of poor road conditions.

Using road conditions as a location criteria, the DCP/EIS may wish to consider an alternate trailhead from the large winter parking lot at Mile 13.9, which is the limit of state snow plowing maintenance, or the informal summer parking area at Mile 18.6. The latter site is served by trail and a bridge across Peters Creek, has a good view of the Alaska Range, and provides access to the "Little Peters Hills". The nearby Forks Roadhouse (Mile 18.9) also provides visitor services. Depending on the time of year, both of these parking areas have potential as trailheads.

#### CHULITNA RIVER BOAT LAUNCH

The EIS should include a boat landing at the downstream terminus of the water taxi route along the Chulitna River. All alternatives currently show only the location of the upstream landing. In addition, the DCP/EIS should explain whether these landings will be open to the general public. If NPS intends that such landings will be operated by concessionaires under NPS management, conflicts with general public use along the state-owned waterway may create administration conflicts.

#### TALKEETNA AIRPORT

Previous scoping comments regarding the Talkeetna Airport still apply. This airport currently experiences congestion problems during spring and summer peak visitor periods. The development of a large visitor center in the Talkeetna area is expected to substantially increase the flight-seeing activity, thus adding to existing congestion. The State Department of Transportation and Public Facilities is currently proposing an airport improvement project for FY 95. If a visitor center is constructed in the Talkeetna vicinity, we recommend that it be located to avoid the flight path of approaching and departing aircraft due to safety considerations. The noise contours generated by the airport should also be considered in locating any facilities in the vicinity.

## HAZARDS

The EIS should acknowledge geologic hazards. Drainages from the Eldridge, Ruth, and Tokositna Glaciers are all susceptible to periodic and rapid changes in water level, caused by sudden drainage of ice-dammed lakes. These outbursts could cause flooding of low areas, and in winter, ice jams and overflow could cause flooding at higher levels. Outbursts are difficult to predict, and should be considered in the proposed development options, particularly along the toe of the Ruth Glacier in Alternatives B, C, and D.

Earthquakes are an additional geologic hazard that require consideration in the EIS. The Denali Fault, just north of the plan area, is one of the major geologic features of Alaska. A number of subsidiary faults run through the south slope region which could be the source of additional seismic activity. Any structures built in this region should accommodate appropriate earthquake design criteria.

## CHELATNA LAKE

The shore of Chelatna Lake is entirely within the Lake Creek portion of the Susitna Basin Recreation River Management area. This area was designated by the state legislature in 1988 because of its high fishery, wildlife habitat, and public recreation values, and is a high priority for active state management. The Susitna Basin State Recreation Rivers Management Plan provides specific management intent for this area. We suggest the NPS work with the State to identify what additional recreation opportunities exist within this planning area.

The sockeye salmon enhancement activities planned for Chelatna Lake should also be referenced and addressed. Such activities may change public use in the area. The salmon enhancement project is managed by Cook Inlet Aquaculture Association. Tom Mears, Executive Director, can be contacted for more information.

## LAND STATUS

While this Alternatives Workbook is preliminary, more land status information would have been useful. Without a better understanding of land status, the public cannot make knowledgeable comments on any of the proposed visitor developments. We urge that the draft EIS fully address the land status, and related implications, associated with each of the proposals included in the alternatives.

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COMMENTS

The "Comments" page requests the public to comment on the appropriateness of certain types of access "in this part of Denali National Park and Preserve". Much of this workbook addresses land outside of the park and preserve, hence comments will likely be solicited inappropriately for non-NPS lands.

On a related note, snowmachining, pack horses, and traditional (pre-ANILCA) ORV access methods on NPS lands are protected by ANILCA. The other forms of access (e.g. hang gliding) are not traditional in the park and preserve. This distinction should be made in future public review documents. As we have stated previously, the State believes that traditional uses should be allowed to continue to the extent possible.

Thank you for the opportunity to comment of the Alternatives Workbook. State agencies look forward to working with NPS representatives as the Development Concept Plan and Draft EIS are prepared. If you have any questions concerning these comments, please feel free to contact this office.

Sincerely,



Paul C. Rusanowski, Ph.D.  
Director

cc:

Russ Berry, Superintendent, Denali National Park and Preserve  
Mike Strunk, Planning Chief, NPS Regional Office  
Harold C. Heinze, Commissioner, Department of Natural Resources  
Carl Rosier, Commissioner, Department of Fish and Game  
John Sandor, Commissioner, Department of Environmental  
Conservation  
Frank Turpin, Commissioner, Department of Transportation and  
Public Facilities  
Albert Clough, Department of Commerce and Economic Development  
John Katz, Governor's Office, Washington, D.C.

Attachment: Governor's Correspondence

State CSU Coordination Distribution List

April 14, 1992

Document: Denali DCP Alternatives Workbook Comments

Tina Cunning, DFG/Anchorage

Terry Haynes, DFG/Fairbanks

Frank Rue, DFG/Juneau

Priscilla Wohl, DEC/Anchorage

Joyce Beelman, DEC/Fairbanks

Chris Christianson, DEC/Fairbanks

Rob Walkinshaw, DNR/Anchorage

Jenny Olendorff, DOTPF/Anchorage

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Steve Jacoby, DGC/Juneau

Beth Kertulla, AG's/Juneau

Connel Murray, Dir. Tourism

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Dick Swainbank, DCED/Fairbanks

John Katz, Gov's Office, D.C.

Stan Leaphart, CACFA

Jim Hammett, NPS, Denver

WALTER J. HICKEL  
GOVERNOR



STATE OF ALASKA  
OFFICE OF THE GOVERNOR  
JUNEAU

DEPARTMENT OF  
NATURAL RESOURCES

FEB 18 1992

COMMISSIONER'S OFFICE  
JUNEAU

January 24, 1992

Mr. Roy M. Huhndorf  
President  
Cook Inlet Region, Inc.  
P.O. Box 93330  
Anchorage, AK 99509-3330

Dear Mr. Huhndorf:

Thank you for your January 9 letter concerning the South Denali project.

Most of the crowding and associated problems in the Denali area stem from a shortage of attractive facilities in the national park. While I question the need to restrict vehicle traffic and public facilities inside the national park to protect wildlife values, it is nonetheless incumbent on the National Park Service to act swiftly to provide alternatives for the public outside the park. Every year, more people are denied an opportunity to enjoy the wonders of Denali. A major visitor facility on the south side of the Alaska Range is essential, if public demand is to be met and Alaska's tourism industry is to thrive.

For many of the reasons you cite in your letter, I support Talkeetna as the site for a major visitor complex. Your parcel offers outstanding views of the mountain, and is easily accessible by railroad. Private ownership of the site simplifies regulatory questions. There are already a number of tourism and recreation services available in town. And finally, the costs of site development appear relatively inexpensive.

Ideally, all interested parties can cooperate towards a major visitor complex in Talkeetna along the lines you describe, and a smaller visitor facility in Denali State Park serving highway-related demand. I am convinced that both sites should be developed, if the Denali region is to realize its potential as a world class destination.

Mr. Roy Huhndorf  
January 24, 1992  
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I pledge the State's support for the Talkeetna site. I am asking Natural Resources Commissioner Harold Heinze and State Parks Director Neil Johannsen to arrange a meeting with you to discuss how we can cooperate to see this important project succeed.

With best regards.

Sincerely,

S/S WALTER J. HICKEL

Walter J. Hickel  
Governor

cc: Senator Ted Stevens  
James Ridenour, Director  
National Park Service  
Mayor Ernest Brannon  
Matanuska-Susitna Borough  
Commissioner Edgar Blatchford  
Department of Community & Regional Affairs  
Commissioner Harold C. Heinze  
Department of Natural Resources  
John Katz, Special Counsel  
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