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April 30, 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 Amendment to the Riley Creek Development Concept Plan (DCP) and Environmental Assessment for the Denali park road corridor and park entrance area. This letter represents the consolidated comments of the state's resource agencies.

The State recognizes that this document contains only minor modifications to the 1983 original DCP and the 1987 Addendum, however state agencies wish to convey the following general comments which pertain to the document as a whole, not just the new information.

Hotel Development

The State generally supports projects which serve to enhance visitation in Alaska or promote establishment of suitable infrastructure and Alaska employment opportunities. Denali National Park and Preserve is one of the State's leading tourism resources. The State believes that existing facilities are simply unable to accommodate those persons wishing to use the park. While we realize that the private sector has recently provided a great deal of additional housing and other amenities, we believe that the National Park Service (NPS) should continue efforts to develop a new hotel within the park boundary. The State would, however, prefer to see the NPS consider a larger hotel to accommodate a greater number of visitors.

Water Quality and Waste Disposal

Because the capacity of the hotel and the season of operation will remain the same as the existing situation, additional waste water and solid waste impacts will not occur. There will, however, be additional waste disposal issues associated with the increase in size of the Riley Creek Campground which are not mentioned in the DCP. Unless this information is addressed elsewhere, it should be included in the final DCP.

There is also a critical demand for more dump station capacity for recreational vehicles visiting the park. The existing NPS dump station is inadequate to meet current and future needs. The DCP should address this serious problem. The NPS should take the lead in working with other agencies and local businesses to find the most appropriate solution. The NPS should consider expanding it's dump station capacity during the design of the other waste facilities for the park entrance area.

Water Rights

The State recognizes that the NPS may have federal reserved water rights within the park. The State nonetheless encourages the NPS to apply for State water rights pertaining to each of the planned activities which require the use of water. Such application would not in any way preempt any federal reserve water rights which may be appurtenant.

It appears that there is no benefit to the NPS in claiming federal reserve water rights at this time. Quantifying water rights through the State would result in substantial cost savings and benefits to both the state and federal governments. Water rights issued by the State would have a priority date senior to other water uses that may apply in the future. Use of the State's water adjudication process also results in the compilation of data concerning water use and other hydrologic information which can help both the State and NPS make better water-related management decisions.

Attached is a water rights application for your use. If you have questions or wish assistance in preparing the application, please contact Gary Prokosch in the Department of Natural Resources, Division of Water at 762-2561.

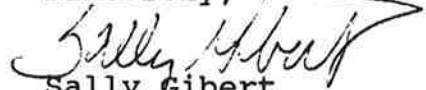
Scope of the Document

Even though this DCP contains only minor modifications over previous versions, it should have been expanded to include more background on existing water quality, habitat, and other issues

normally included in an E.A. of this nature. Also, the content tends to be disjointed. If future revisions are anticipated, consideration should be given to separating some of the major components.

Thank you for the opportunity to review the Riley Creek DCP/EA. If you have any questions, please feel free to contact this office.

Sincerely,



Sally Gibert
State CSU Coordinator

Enclosure: State water rights application

cc:

Russ Berry, Superintendent, Denali National Park and Preserve
Harold 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
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State CSU Coordination Distribution List

May 1, 1992

Document: Riley Creek DCP/EA State Letter

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