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Boyd Evison
Regional Director
National Park Service
2525 Gambell Street
Anchorage, AK 99503-2892

Dear Mr. *Boyd* Evison:

The following are the State's supplemental comments on the draft General Management Plan (GMP) for the **Denali** National Park and Preserve (NPPr). They pertain to the sections of the GMP that address South-side and North-side proposals.

SOUTH-SIDE PROPOSALS

While the State is supportive of the south-side development concept and NPS' contribution to the cooperative planning process, we are concerned that the GMP does not provide the public with an adequate understanding of south-side proposals. In particular, we feel that the GMP lacks clarity in its treatment of (1) the current status of the project, (2) the respective roles and responsibilities of the State and the NPS in the planning and implementation of south-side development, and (3) how south-side development will reduce demands on the existing park road to Wonder Lake and provide for expanded visitor opportunities on the south-side of the NPPr. Additional site-specific details and impacts should not be addressed in detail in the GMP, but should be left up to the State's planning process. At that time NPS would participate cooperatively in review of an impact assessment. The following sections should be revised with the above considerations in mind: Introduction (page 3), Visitor Use and Development (pages 10-27), Environmental Assessment (pages 75, 78-80, 95-102), and Consultation and Coordination (page 125).

As noted in the GMP, most of the proposed south-side development would take place on State park lands. Given this, we request that the GMP clearly indicate that the State has primary responsibility for project development and implementation. We further request that the GMP define NPS' cooperative role in south-side development (such as to provide technical assistance regarding economic and feasibility analyses; environmental studies; marketing; facility planning and design; concession

contracting and management; traffic management planning; interpretive services; and/or possible funding of interpretative facilities). The State looks forward to working cooperatively with the NPS on the proposed visitor complex.

We also request correction of implications that south-side development is assured and that the Curry Ridge site has already been chosen. Development of a visitor facility on Denali's south-side is contingent on several factors, including receipt of adequate funding to carry out analyses of the site and environmental impacts, engineering studies for south-side roads and utilities, and economic analyses; and private sector interest in the project. This needs to be made clear in the GMP.

The GMP needs to clarify that the State will assess the potential impacts of development on State park lands. Current statements which imply that little or no impact would occur, such as those which appear on page 97, are premature. An assessment of the impacts has not yet been done for the proposed development on State land and therefore potential impacts are not yet known. (For an example of some of the fish and wildlife values that may be affected, see Appendix A).

Page-Specific Comments Regarding South-side Development

Page 10, Visitor Use and General Development - This discussion could imply major new recreational developments in the south Park extension. However, the Proposed Management Zoning map on pages 11-12 do not show a "Park Development Zone" on the south-side. The GMP should be clarified to indicate whether the NPS intends to "develop" the south side or instead to supplement facilities developed on adjacent State Park lands. If NPS does intend any developments in the south Park extension (including facilities in support of State park developments), the GMP needs to be specific about these proposals and the maps and text corrected accordingly.

Page 20, paragraph 2 - We request clarification of the justification used in this paragraph for asserting that the "Tokositna Glacier now appears to be impractical as a major development site".

Page 25, paragraph 2 - We request a description of what "numerous activities" will exist to explore the Chulitna and Tokositna Valleys.

Pages 19-25, South-side Proposals - We request a discussion of how the NPS has worked and/or will work with the public, including Native corporations, to provide for visitor services and facilities as required by ANILCA Sections 1306 and 1307.

Page 64, paragraph 5 - This paragraph implies that if State-owned Curry Ridge is selected for visitor development focused on Ruth Glacier, the congressionally recognized Chelatna Lake area would not be pursued. We request that the appropriate sections of the GMP, as well as the Land Protection Plan, contain a description of NPS' intent for the Chelatna Lake area if Curry Ridge is not selected for visitor development.

Page 95, last paragraph - The second sentence should be ". . . Denali National Park and Preserve"

NORTH-SIDE PROPOSALS

The section on North-side Proposals needs to better address how the NPS plans to respond to increasing NPPr visitation, overuse of the park road, and consequent threats to wildlife viewing. This section, as currently written, is inadequate in that (1) all of the proposals it sets forth are contingent on south-side development, which is not yet certain; and (2) even assuming development occurs in Denali State Park, the demand for the north-side may not be significantly reduced. We request that the GMP fully address alternative means for responding to the 250,000 additional visitors per year that the NPS expects will come to Denali NPPr within the 10-year planning period. If NPS believes that there needs to be development on the south-side in the event that development does not occur on State lands, the GMP should outline the various proposals that should be considered.


ADDITIONAL COMMENTS

Page 96, paragraph 3 - We request that the following sentence be deleted or revised: "Most new development on the south-side of the national park would occur at high elevation sites that do not provide suitable habitat for large mammals." Some high-elevation sites, both in and out of the NPPr, do provide above average black and brown bear habitat. Some areas are also important fall or wintering moose habitat. An area adjacent to Curry Ridge is habitat used by a small caribou herd.

Page 97, Bears, paragraph 5 - We request that this paragraph be carefully written to clarify actual impacts which are anticipated for bears and their habitat. The discussion is misleading in stating "little bear habitat occurs" and the area that will be used for access and development "is insignificant compared to the total available." The paragraph fails to clarify that the major visitor developments are intended by the NPS to be located on State land which has important bear habitat. The statement that "Approximately 25 acres would be utilized for access and development . . ." is particularly misleading in that traffic, noise, and human use of trails radiating from the development area would clearly affect an area greater than 25 acres.

Thank you for your consideration of this additional input. If we can be of any assistance in clarifying our concerns, please contact this office. The State looks forward to a final plan which adequately addresses these comments.

Sincerely,



Sally Gilbert
State CSU Coordinator

Appendix Attached

cc: R. Davidge, DOI
J. Katz, Governor's Office, D.C.
S. Leaphart, CACFA
J. Leask, AFN
R. McCoy, ALUC

State CSU Contacts

APPENDIX

Fish and wildlife values and concerns in the Vicinity of Curry Ridge.

Black Bear/Brown Bear

Good late summer and fall habitat for black bear and brown bear is found on Curry Ridge and other similar ridges in the area. The large quantities of berries found on Curry Ridge attract bears from lower elevations.

Development of a large tourism facility on Curry Ridge would result in inevitable bear/human confrontations, especially during late summer and fall. The potential for bear/human confrontations would, in all likelihood, be the same regardless of the location of a tourism facility along Curry Ridge, or for that matter, regardless of the location along any similar ridge system in the same general area (e.g. Alder Point). Future planning will describe the mitigation measures which will be proposed to minimize the level of bear/human confrontations (e.g., fencing and waste disposal in the Curry Ridge area.

Moose

Curry Ridge is in an area depicted on the ADF&G Alaska Habitat Management Guide maps as general distribution for moose. General Distribution is defined as suitable habitat within the known range of moose. Fall aggregations of moose are known to occur in the Blair Lake area, situated south of Curry Ridge. These moose probably represent a subpopulation of moose between the Chulitna and Susitna Rivers.

Curry Ridge is generally not considered good moose winter habitat due to snow and cover conditions. Known moose winter concentration areas occur farther along the Susitna River corridor and north of Curry Ridge along the Chelatna River corridor.

Trumpeter Swans

Trumpeter swans are known to nest in the lowland areas west of the Tokositna River (west of Curry Ridge) and at Byers Lake. Road, trail, and campgrounds to be located between the Chulitna and Tokositna Rivers as part of the overall proposed development of Denali State Park may impact trumpeter swan nesting habitat.

Anadromous Fish

All species of salmon are found in the Susitna and Chulitna Rivers, with the exception of pink salmon in the Chulitna River. Significant numbers of chinook and coho salmon are known to spawn in Troublesome Creek. Chum salmon spawn in the lower reaches of Troublesome Creek. Chinook, sockeye and coho salmon are found in the Tokositna River. Coho salmon are found in the outlet creek from Blair Lake.

Resident Fish

Rainbow trout, grayling, char/Dolly Varden, and burbot are found in the Susitna and Chulitna River Drainage including Byers Creek. Lake trout and burbot are found in Byers Lake. Grayling are found in Troublesome Creek; however, the upstream extent of grayling in Troublesome Creek is undocumented. Grayling and char/Dolly Varden are found in the Tokositna River Drainage.