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October 3, 1991

South Slope Denali Comments
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The State of Alaska has reviewed the South Slope Development Concept Plan (DCP) Scoping Letter prepared by the National Park Service (NPS) for the Denali National Park and Preserve. This letter represents the consolidated comments of the Alaska Departments of Natural Resources (DNR), Fish and Game (DFG), Transportation and Public Facilities (DOTPF), and Commerce and Economic Development (DCED). Our comments are provided to you under the following major headings; State/federal Coordination, Highway Related Visitor Facilities, Park Activities, and Trails and Public Use Cabins.

State/federal Coordination

We strongly encourage the NPS to coordinate on specific issues in the planning for the South Slope Development Concept Plan through the Division of Governmental Coordination (DGC). The State, via the coordinating role of DGC, has worked cooperatively with the NPS over the past 10 years in overall park planning issues involving specific state agency concerns and responsibilities. Continuing in this manner will ensure that NPS planning efforts will be coordinated directly with all the participating State agencies. A State response from DGC is the product of consensus among all concerned State agencies. Direct contacts and exchanges of information between the NPS and individual State agencies are encouraged to improve communication and cooperation. However, any responses from individual State agencies which are not incorporated in the State's formal response from the DGC should be considered by the NPS to be solely the views of the responding agency, rather than presuming them to be the views of the State.

To ensure a comprehensive planning effort, we suggest the NPS

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cooperatively address many specific issues in supplemental work sessions and/or scoping correspondence with the participating State agencies. We also suggest that NPS review past State correspondence which reflects outstanding concerns such as the State's reviews of the Denali National Park/Preserve General Management Plan.

We emphasize our interest in participating in this planning effort as final facility developments will have a direct influence on State park lands, other general State-owned lands, and other State management responsibilities. As you know, ADPOR manages Denali State Park, 324,240 acres in size and abutting the southern boundary of Denali National Park and Preserve. The State park's proximity to the national park, plus its accessibility by the Parks Highway, means that whatever alternative plans are eventually developed for the Denali NP&P will inevitably have direct and indirect effects on state park lands.

We understand that David Stephens, Chief of Planning and Operations for Alaska Division of Parks and Outdoor Recreation (ADPOR), has already been given membership on this project's planning team. We are pleased that ADPOR is represented and DGC will rely on this representation for issue identification and dissemination to other concerned State agencies. In representing the views of the state park agency, he will rely on the 1989 Denali State Park Master Plan, which was developed with the cooperation and participation of the NPS. This plan should be consulted for the large amount of information it contains as well as its many recommendations dealing with many of the issues outlined in the scoping letter.

Highway Related Visitor Facilities

As background, the NPS entered into a cooperative agreement with DNR and DCED in 1988 toward assessing potential visitor developments in Denali State Park to support the NPS visitor needs. Potential visitor facility developments were addressed in the Denali State Park Master Plan process. However, the focus of this planning effort was toward the State park's needs, not the national park. Additional issues such as transportation corridors, impacts on existing residents activities, waste disposal, water sources, potential zoning of uses, and impact on fish and wildlife habitat will need a more thorough, wider geographical assessment.

The criteria identified in the scoping letter for evaluating alternative visitor center locations are helpful but incomplete. The State's 1988 master plan analysis of 16 alternative visitor center sites incorporated 13 criteria, providing a better sense of the relative advantages and disadvantages of each location. In contrast, the three criteria cited in the scoping letter are biased in favor of already developed areas and give no treatment to the important issues listed above, in addition to potential conflicts

with community values, resource impacts, and effects on existing use patterns. We urge you to expand the list of criteria to include other important factors that should be considered in alternative site evaluations.

The State encourages development of an appropriately designed NPS visitor center on the Cook Inlet Region, Inc. property south of Talkeetna. That site is well suited for serving package, rail-based tourism traffic, given the short distance to the rail station and Talkeetna's tourism-based economy. There are already numerous tourism-related services in Talkeetna to serve the traffic generated by a visitor center, including flight services, river guides, food and gift shops, and overnight lodging. Of course, appropriate measures should be built into the facility's design and operations to mitigate against negative impacts to Talkeetna's small town character, for example bus service between the visitor facility and the town center.

We also believe that a large visitor center in Talkeetna in no way eliminates the desirability or demand for a complementary visitor facility within the state park. The state park master plan identifies three locations for major development. Our preference in the past has been the northern end of the park, for a variety of reasons including road and rail access, little potential for spillover development on nearby private land, few known wildlife impacts, and few existing use patterns that would be affected. We continue to believe the High Lake area may be desirable, but a rail-oriented facility in Talkeetna may free the state park facility to focus on highway traffic. The state park's southern end offers wonderful views of the mountain and has a number of other attractions, but was dismissed in the past largely because it lacked rail access. We should examine this area for suitability for the second, highway oriented visitor facility.

Relative to other highway-oriented facilities like scenic pullouts, interpretive signing, sanitary facilities, etc., we note the "maximum development" list does not include the highway facilities contained in the state park plan. In fact, it appears that the entire Parks Highway corridor through Denali State Park has been eliminated from consideration. This must be inadvertent, since an earlier section of the scoping letter states that locations along the highway will be identified. The highway section through the state park offers some of the best opportunities for these types of facilities. Please consult the state park master plan for details.

As the State has noted before, construction of a visitor facility in Talkeetna could have significant impact on the Talkeetna airport facility. Depending on traffic volumes, improvements to the airport may be required at some point in the future. Please contact Mr. Roger Maggard, Central Region Planner, DOTPF at 266-1653 for information on visitor center/airport planning issues.

Park Activities

Dunkle Mine Area- The Dunkle Mine area was recognized to be highly and diversely mineralized shortly after the turn of the century and has had a long and continuous history of prospecting and mining. The mineral potential of the area was again recognized and reinforced in a 1983 U.S. Bureau of Mines study. This study notwithstanding, the area was annexed into the park in 1980 for rational concerning critical caribou habitat.

In 1984 the Alaska State Legislature voted 56:0 to try to exchange the Dunkle area out of the Park, because of its well demonstrated mineral character, other multiple-use attributes, and less demonstrable critical caribou habitat character. This effort was unsuccessful.

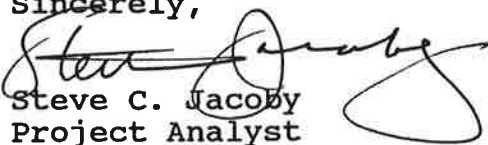
The Scoping letter deals little with critical caribou habitat and much with expanded facility development. To this end, we agree with the concept of providing access to a larger spectrum of users than at present for the area between Broad Pass and Cantwell. We encourage the alternatives analysis to include reconsideration of the Dunkle Mine area land exchange in order to provide expanded multiple use opportunities in this area of demonstrated mineralization and historical mineral development. Please consult with Mr. Al Clough, Mineral Development Specialist, DCED, at 465-2017 for information regarding this subject.

Trails and Public Use Cabins

End of Petersville Road- The Scoping letter identifies a proposal to establish a trailhead at the end of Petersville Road. It should be noted that Milepost 18-36 of the Petersville Road is 4-wheel drive only. Winter snow is not plowed beyond Kroto Creek.

Thank you for this opportunity to provide comments at the early stage of this important planning process. We look forward to cooperatively participating in this effort, and the opportunity to review the DCP/EIS upon completion. Please feel free to contact me at 465-3562 with any questions you may have.

Sincerely,


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Project Analyst

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