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September 21, 1993

Russell Berry
Superintendent, Denali National Park and Preserve
P.O. Box 9
Denali Park, Alaska 99755-0009

Dear Mr. Berry: *RUSS*

The State of Alaska has reviewed the Draft South Slope Denali Development Concept Plan (DCP) and Environmental Impact Statement. This letter represents the consolidated comments of the State's resource agencies.

When the National Park Service (NPS) first embarked on this most recent plan for visitor facilities on the south side of Denali National Park and Preserve, the State expressed a desire to work with the NPS on the following goals: Facilitate opportunities for public use of the area; benefit area visitors and Alaska's tourism industry generally; enhance use of the Denali National Park and Preserve and the adjacent Denali State Park; and improve the travelling experience along the George Parks Highway.

With great regret, State agencies cannot support this plan because it does not yet cooperatively accomplish all of these goals. As a document prepared under the National Environmental Policy Act, the EIS is also largely inadequate and deficient with respect to consultation with affected parties, use of existing information, and analysis of impacts and mitigation measures.

Despite these major shortcomings, the State remains committed to working with the National Park Service in producing a revised plan that will meet the goals above. We believe it is in the best interests of the State, the National Park Service, and the public to develop a mutually acceptable plan to address increasing visitation to the Denali National Park and Preserve and vicinity.

These comments are organized into two parts. This cover letter highlights the State's key concerns. An attachment contains greater detail on most of these issues and conveys additional technical comments.

Flawed Process

The process used to develop this EIS does not conform to the Council on Environmental Quality's consultation requirements at Sections 1501.2, 1501.5 and 1501.6. Specifically, the State objects to the lack of consultation with knowledgeable State staff following the December 1991 and January 1992 interagency meetings. Given that the plan impacts the State and other landowners by proposing improvements outside the boundaries of the national park, it is inexcusable to devote substantial time and public funds without a true partnership with the agencies and landowners who would, by the plan's own design, share responsibility for implementation. This lack of essential roll-up-the-sleeves teamwork sets this plan up for potential failure, even though it may contain specific proposals that have merit upon individual consideration. Until and unless the NPS consults with affected State agencies to address the issues raised in this letter, the State cannot support this plan -- particularly those developments proposed for State land. We suggest NPS consider naming the State as a cooperating agency under Section 1501.6 to insure adequate consultation.

Scope of the DCP: Park-wide Access and the North Side

Denali National Park's real access and visitation problems are on the park's north side, and those problems will remain in spite of the proposals in this DCP. While the current South Slope effort offers some small hope of easing the park's extreme crowding and surplus visitor demand during the summer season, we believe the DCP's improvements will be only marginal, at best, in addressing overall needs. To the extent this plan diverts attention away from these issues, this plan might even be considered a disservice to the needs of the public. At a minimum, the plan should describe in detail NPS's current and projected efforts to address the larger access concerns so that south side proposals are not seen as a substitute for north side access.

Lack of Improvements Inside the Park

Most of the proposals in the preferred alternative are not located on national parklands. But as Alternatives A and B suggest, there remain many feasible and desirable options for additional access into the national park itself. In addition, past NPS planning efforts have identified other opportunities for visitor facilities on federal parklands. We recognize the value of developments outside the national park, but feel the NPS should take greater responsibility for absorbing visitor impacts associated with national park visitation. The preferred alternative should include more facilities on national parklands, possibly including a central visitor facility.

Maintenance and Operations

The State believes that the NPS should take primary responsibility for funding the maintenance and operation of facilities recommended by the DCP, regardless of location inside or outside the national park. The DCP does not fully address this pivotal issue, a deficiency which could single-handedly render this plan useless.

Impacts on the Parks Highway

Using the Parks Highway, its waysides and turnouts, as a destination will contribute substantially to congestion. Such use detracts from the primary transportation function of the highway. Implementation of this plan will create a dangerous mix of high speed through traffic (including double-trailer trucks up to 120 feet long) with slow moving tourist traffic on one of Alaska's primary highway arteries. In consultation with the State, the plan and EIS must cooperatively address traffic impacts in the entire planning area, and include measures to mitigate these impacts. The EIS is currently incomplete without such an analysis.

Fish and Wildlife Concerns

The Department of Fish and Game (DFG) has devoted considerable effort in past years to providing NPS with detailed comments concerning fish and wildlife for use in the planning and EIS analysis process. It appears that NPS has inexcusably ignored this input. Rather than reiterating DFG's detailed comments, NPS should review previous extensive correspondence. DFG remains committed to working with the NPS in locating recreational facilities through designing studies and assessing the potential impacts of all alternatives on resources and resource users.

Purpose of the Plan

As currently written, the plan lacks a single clear statement of purpose. We realize that the long history behind this planning effort has likely led to a sometimes confusing and evolving set of purposes. We recommend that the purpose(s) of the plan be clarified in conjunction with laying out the context for park-wide access issues.

Private Development Along the Highway

Additional private lodges, restaurants, gas stations, etc. are likely to be built to serve these visitors. Such activities are appropriate; however, they should be designed and sited to

complement the public facilities proposed in the DCP, maintain traffic safety, and protect the scenery along the highway. The EIS should address these impacts, including identification of mitigating measures like land acquisition, cooperative agreements, and purchase of scenic easements. NPS should also place greater emphasis on offering assistance to private landowners wishing to develop visitor services, consistent with ANILCA Section 1306.

Visitor Demand Studies

To facilitate revisions to this DCP, and to assist in establishing a park-wide context for this south side plan, the State requests the NPS conduct a study of visitor demand.

Specific Proposals and Alternatives

The larger issues expressed in this letter such as poor coordination, lack of recognition of the park and preserve's larger north side access issues, and the inadequate or nonexistent impact analyses, prevent the State from endorsing a particular alternative or combination of alternatives at this time. Assuming that these deficiencies can be corrected, this letter offers technical suggestions for additional NPS consideration. Until the NPS has satisfied the State's larger substantive issues, these suggestions, shown in Attachment A, should not be interpreted as final State support for any given alternative or proposal.

Visitor Centers

The State conceptually supports the large visitor center near Talkeetna and a smaller center in Denali State Park. We are concerned, however, with the constraints placed on the Talkeetna center in the preferred alternative. These unsubstantiated and subjective caveats concerning demand and costs will likely delay this important facility's construction for years, perhaps indefinitely. We are studying these proposals in more detail and will likely submit additional comments specific to visitor center development before the close of the comment period.

Trails and Roadside Exhibits

The DCP should insure that trail and roadside exhibit proposals adequately address the non-wilderness-oriented tourists, such as bus tour groups, who generally prefer easy access and short trail opportunities. All trailheads and roadside facilities should have adequate parking, garbage disposal and latrines. The EIS should also assess the impacts of new trail proposals on existing uses such as hunting and subsistence activities.

The State is also concerned that the DCP/EIS has not addressed impacts of trail development on existing mining activities. Given recent NPS opposition to mining in the northern portion of the park, it is predictable that encouraging foot traffic in the vicinity of on-going mining could lead to further restrictions on those operations. We suggest the EIS look for alternative routings that direct foot traffic away from active mining areas. As noted in past correspondence, working with the claim holders is essential so that trail impacts on present and future mining operations are minimized.

Conclusion

These comments, including the Attachment, document specific instances where better coordination by the NPS with State agencies could have produced a better product. State agencies have expressed frustration with the lack of active day-to-day State involvement in the development of this DCP. There are obvious advantages in having a close, cooperative relationship between the State and NPS during the formulation of this plan. This is true for all national park planning efforts, but it is especially important when most of the proposals are focused on State and private lands outside the national park boundary established by Congress. We have several times cautioned the NPS about the need for more frequent interagency contact. The most recent correspondence is attached.

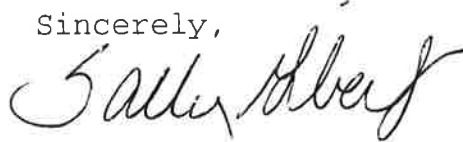
We cannot support implementation of this plan as written due to the lack of genuine cooperation with the various affected State agencies and other affected landowners. In spite of our unsatisfactory experience to date, we remain interested in and committed to the South Slope Denali project and are prepared to work with the NPS in a cooperative, respectful way as the project enters a new phase. We look forward to working with the NPS to design a process that will bring this plan to a successful solution, not just a plan that sits on the shelf.

To correct the deficiencies noted in this correspondence, we believe that a revised draft EIS will be necessary, with substantially expanded alternatives and more comprehensive impact analysis. To accomplish this, we suggest formation of a planning team or task force with active representation and participation of affected State agencies. Such a team approach will greatly increase the likelihood of successful implementation. While such structures can be cumbersome, they typically prove their worth in the long run. State agencies place a high priority on completion of this plan and are willing to work with the NPS on a schedule which will lead to a final plan by September 1, 1994.

Discussions about this document are continuing within State agencies. We are aware that the comment period was recently extended to November 1, 1993, and we intend to provide supplemental State comments concerning visitor facilities and possibly other issues by that date.

We look forward to hearing from you.

Sincerely,



Sally Gibert
State CSW Coordinator

Attachments:

Technical suggestions regarding the alternatives
Letter from Department of Natural Resources

cc:

John Morehead, Regional Director, Alaska Region, NPS
The Honorable Ted Stevens, U.S. Senate
The Honorable Frank Murkowski, U.S. Senate
The Honorable Don Young, U.S. House of Representatives
Harry Noah, Commissioner, Department of Natural Resources
Carl Rosier, Commissioner, Department of Fish and Game
John Sandor, Commissioner, Department of Environmental
Conservation
Bruce Campbell, Commissioner, Department of Transportation and
Public Facilities
Richard Burton, Commissioner, Department of Public Safety
John Katz, Governor's Office, Washington, D.C.

Attachment
September 21, 1993
State of Alaska letter to NPS
South Slope Denali DCP/EIS

Flawed Process

The Service has previously pursued planning for facilities on the south side with similar poor coordination with the State and other affected landowners. This time the Service went so far as to invite State participation on a planning team. Interagency meetings were held in December 1991 and January 1992, with the understanding that there were be additional consultation as the planning process proceeded. Since these meetings however, there has been virtually no substantive follow-through. For example:

The Alaska Department of Transportation has not been consulted concerning the potential impacts of the proposed developments on the highway and adjacent right-of-way.

The Alaska Department of Fish and Game (DFG) reports only one contact by NPS since the meetings above, despite the myriad fish and wildlife-related concerns raised in extensive reviews of at least three predecessor documents (including the 1985 General Management Plan), and requests for such consultation. NPS staff expressed desire to meet with local DFG staff to assess opportunities for joint planning and data assessments; yet no follow-up contact was made for data on fish, wildlife, or public uses of the area -- even for development areas outside the national park.

Neither the State's designated representative on the NPS planning team from the State's Division of Parks and Outdoor Recreation, nor any other State representative, were subsequently contacted to attend team meetings or work sessions. At best, NPS representatives have met briefly with the Division of Parks on an irregular and superficial basis.

At the outset of this plan, State agencies believed that they would be closely involved on an informal partnership basis. The State has written the NPS on several occasions about the need for close and frequent contact with affected landowners. The NPS should not only be working more closely with the State, but with other affected landowners as well, e.g. CIRI, miners, and other local landowners.

The CEQ regulations governing the development of EISs are explicit about the necessity of adequate consultation with interested parties. For example, Section 1501.5(b) states that "Federal, State, or local agencies, including at least one Federal agency, may act as joint lead agencies to prepare an [EIS]." This is especially significant in light of the requirement in Section 1501.6 that "any other Federal agency which has *jurisdiction by law* shall be a cooperating agency." [emphasis added] While not a federal agency, clearly the State of Alaska has jurisdiction over much the area in which the plan proposes developments, and merits similar treatment.

Scope of the DCP: Park-wide Access and the North Side

Much of the current public discussion and controversy in the Denali region centers on public access to and within the national park: how much, what type, locations, travel modes, frequency, allocation of limited capacity, etc. The NPS must find acceptable ways of improving and increasing access into the park's northern half. Visitor access facilities on the south slope will serve an important purpose, but they do not obviate the NPS from addressing the ever-increasing demand for north side access.

We realize that this DCP was not intended to address park-wide access needs or north side access specifically. In hindsight, it might have been better to broaden this effort into a full-fledged update of the general management plan. Given the decade or so of work invested so far on south side issues, however, we believe this process should move forward *contingent upon* DCP recognition that this plan will not lay these critical issues to rest.

Lack of Improvements Inside the Park

Most of the proposals in the preferred alternative are not located on national park lands, e.g. the two visitor centers, almost all the new camping capacity, and highway interpretive exhibits are located outside the national park. There are no new public use cabins proposed in this 6 million acre park, and new trail proposals total just 42 miles, the smallest trail network of the different alternatives. Much of this imbalance may be attributed to simple geography; the south side of the national park has no road access and consists mostly of rough terrain. We also recognize that most of the attractive, road-accessible public lands within view of Mt. McKinley are in the adjacent Denali State Park.

This planning process should, nonetheless, include consideration of additional development opportunities on national parklands. In particular, the plan should consider new recreational opportunities in areas of the park which were excluded from the Regional Director's wilderness recommendations, i.e. east of the lower Ruth Glacier, west of the Ruth Glacier, and southwest of the Tokositna Glacier in the Wildhorse Creek and lower Kanikula drainages. These areas were specifically excluded from the wilderness recommendations to allow for development of trail systems and public use cabins. (Final EIS and Wilderness Recommendations for Denali. Page 20.)

We are concerned that focusing developments outside the park on State land will lead to loss of, or secondary impacts to, valuable wildlife habitat and existing recreational and subsistence uses. Access improvements in the more remote national park would have significantly less impact on existing subsistence and recreational hunting and fishing activities.

Maintenance and Operations

The siting of most facilities outside the national park raises another important issue that is not adequately addressed in the DCP: maintenance and operations. We assume that NPS will maintain and operate facilities in the national park. There is some question, however, whether NPS will also commit to facility maintenance outside its boundaries. The DCP merely states that facility proposals are dependent on reaching agreements with the respective landowners on operational responsibilities. This sweeps a pivotal issue under the rug. Without some expectation that these facilities will be maintained, there is little value in the proposals, or the plan itself. Substantive, productive discussions of this essential issue have not yet occurred with the State.

Impacts on the Parks Highway

By attempting to shift visitor use away from the core of the national park, the DCP makes the Parks Highway a defacto extension of the park. Concentrating hopeful park visitors along the State Highway System and holding them there while they wait to experience the park serves the function of the highway poorly. Normally, turnouts and waysides are incidental to, and enhance, the transportation function of a highway; they are not meant to be destinations.

To take advantage of the new roadside activities, tourists will do a lot of stopping and turning, while through traffic will want to move along at the posted speed limit. Mixing all these vehicles with the expected increase in roadside pedestrians will lead to major traffic and safety impacts on the Parks Highway.

The DCP, however, contains not a single word concerning the impacts of these proposed activities on the through traffic movement between Anchorage and Fairbanks, or the necessary modifications to provide for public safety. For example, the plan should address traffic and pedestrian patterns and proposed safety mitigation efforts for each interpretive site, the junction of the Talkeetna Spur and on the Spur itself, the Cantwell campground, and at the proposed visitor centers.

Fish and Wildlife Concerns

Fish and wildlife habitat, patterns of wildlife movement, and human uses of fish and wildlife have all been addressed at length in previous comments. As previously noted, the NPS has made virtually no effort to contact state biologists, park rangers, or subsistence specialists to assist with facility siting or any other aspect of this plan.

For example, the trails proposed in the various alternatives will make the area more accessible for hunting. Impacts on existing recreational and subsistence hunting should be addressed, as well as possible impacts on the region's overall bear population.

We request that the NPS review previous extensive correspondence from the State concerning South Denali and related issues in the general management plan. These include the following (all from this office, except as noted):

November 30, 1985	draft General Management Plan
June 9, 1986	draft final General Management Plan
April 15, 1991	Talkeetna Visitor Center E.A.
October 3, 1991	South Slope DCP, Alternatives Workbook
December 30, 1991	South Slope DCP, Scoping (from DNR)
April 30, 1992	South Slope DCP, Alternatives Workbook

If necessary, we can provide copies of these transmittals.

Purpose of the Plan

As previously noted, the plan conveys some confusion about the purpose of the plan. For example, the cover page indicates that the actions proposed are an attempt to provide opportunities for visitors to experience the natural and cultural resources of the south slope of the Alaska Range. Yet discussions later in the report (page 112) indicate a lack of solid information about the demand for south side facilities. Other indications of purpose (pages 3 and 19) are similarly confusing: there isn't a long range plan so we'll do one, Congress suggested a plan so we'll do one, and Cook Inlet Region Inc. asked us to build a destination-oriented visitor center on their land so we'll do a plan.

Private Development Along the Highway

The visitor centers, camping, hiking, and interpretive information will encourage visitors to spend more time along the highway system from Talkeetna to Riley Creek. The DCP and EIS ignore the anticipated impacts along the highway from new private development that will be spurred by the addition of new visitor attractions. If these problems are not addressed, the Parks Highway could become another victim of the scenic blight that surrounds the approaches to many national parks in the lower 48 states. Development of private land along the highway in Denali State Park is governed by a borough ordinance. Land along the highway outside the state park boundary is not subject to the ordinance and is therefore of particular concern.

The Department of Natural Resources funded a study summarized in *Scenic Resources along the Parks Highway (1981)* with recommendations for management of the highway. This report is incorporated in the guidelines of the State's Susitna Area Plan for management of state and borough lands. The DCP does not address or mention this report, and is not consistent with the State's plans on this issue.

Visitor Demand Studies

In conducting a study of visitor demand, the NPS should consult independent recreationists, package tour participants, and all facets of the visitor industry. We suspect that such a study would indicate a general dissatisfaction with simply viewing the national park from outside its boundaries or driving through a relatively insignificant corner of it. The

study should also include a component which addresses possible impacts of new and increasing recreational use on existing recreational and subsistence uses. The NPS should subsequently use the results of such a study to modify or supplement recreational development proposals.

Land Status

The DCP/EIS does not include detailed land ownership information. It is impossible to check land status with the maps provided. No state general domain lands appear to be affected by the proposed alternative, but we cannot be sure without a more accurate map. A map with township and range information should be included in the final EIS.

Access for the Disabled

We do not believe the needs of the disabled have been adequately addressed in this plan. For example, all vehicles equipped for wheelchair use should be eligible for special passes into the park. Under the American Disabilities Act, we recognize that wheelchair access and facilities will be available at visitor and interpretive centers, but will consideration also be given to blind and deaf visitors? Wildlife and scenic viewing sites should also provide opportunities for disabled persons.

Specific Proposals and Alternatives

Trail Development

To refine the trail proposals we suggest a cooperative interagency team look at expanding the trail system beyond the current proposal of 41.6 miles, much of which is outside the part of the park normally considered the south side. We are conceptually supportive of new trail proposals if they can be shown to have minimal impact on water quality, fish and wildlife habitats and their uses, etc.

Mining activities should also receive greater consideration in the trail planning process. Some aspects of the current proposal could be damaging to existing mining as well as future mineral development in the area. As stated in our April 1992 comments, we continue to urge the DCP to acknowledge and address these conflicts.

In the Golden Zone/Dunkle Mine area southwest of Cantwell, a trail network is proposed for construction from the Dunkle Mine Road, a RS 2477 right-of-way. In the Peters Hills/Dutch Hills area, access to the park is proposed from the end of the Petersville Road. Although we believe the extension of the Petersville Road has merit, we do not believe potential use conflicts have been adequately addressed. Both of these trails will pass close to existing mining operations which will be visible, perhaps highly so, from the proposed trails.

We are very concerned that in the southern (Peters Hills/Dutch Hills) area, the trail into the park has not been defined to any usable scale, and to our knowledge none of the claim holders have been contacted. At the December 1991 meeting, the State left with the impression that the NPS would make a concerted effort to contact individual claim holders and landowners in areas affected by this plan. We are unaware of such subsequent follow-up. Without such close coordination, the proposed trails may be subject to being inadvertently dug up or blocked. The NPS should locate and involve mining claimants and other affected landowners in the planning process.

Other specific trail-related comments:

- * The Alder Creek Trail relies on a boat-accessible trailhead, but there is no mention of how or where those boats would launch into the Chulitna River from the road system. A road-accessible boat launch and associated parking area should be identified for the Alder Creek Trail.
- * Alternative B includes two trail proposals that would traverse parts of Denali State Park. We believe these or similar trail links into the national park would be appropriate, provided that fish and wildlife issues can be addressed and suitable arrangements can be made regarding routing, design standards, and maintenance, management responsibility and funding.
- * Any trail development in the Tokositna and Dutch Hills should be accompanied by improved trailheads, with parking, garbage disposal and sanitary facilities.

Roadside Exhibits

With proper coordinated planning with affected State agencies and other affected landowners, we encourage consideration of the roadside exhibits proposed in Alternative B for the

stretch of Parks Highway in Denali State Park. Such consideration must include recognition of the necessity of sanitary facilities at all roadside facilities, and working with the State Department of Transportation on siting and design to address safety concerns. For example, there is still no recognition or discussion in the document about potential impacts and mitigation measures associated with increased garbage accumulation, the demand for sanitary facilities, and traffic congestion. Will federal highway funds be available for construction and maintenance? Will the sites be accessible in winter, and if so who will pay for snow removal?

In the area covered by this plan, the substantial increase in visitors has already put significant pressure on the existing solid waste and wastewater disposal systems. The EIS addresses a variety of environmental impacts primarily focused on vegetation and certain animal species. Yet there is no discussion of water quality. For all roadside facilities in all alternatives, the document should discuss the availability of basic services such as solid waste and wastewater facilities, the availability of potable water, and the impacts to water quality of the various development alternatives.

Other specific comments:

- * The exhibit called McKinley View should actually be located at Milepost 135 (not 136), where there is an existing facility operated by Alaska State Parks (including latrine).
- * The Lower Troublesome Creek proposal also already exists, but would benefit from new interpretive materials.
- * The Byers Lake roadside exhibits should be relocated to the vicinity of the Alaska Veterans Memorial, less than 1/4 mile north of Byers Lake. The memorial also has sanitary facilities.
- * The Denali Viewpoint proposed for Milepost 160 should be relocated to Milepost 162, where a modest roadside facility already exists. The mountain views and the potential for short trail loops are better.

Public Use Cabins

The NPS's proposed alternative only calls for the conversion of two administrative cabins to "administrative/public use".

We believe there are several other sites where NPS should consider placing cabins to protect public health and safety, such as those cabin sites identified in Alternative B which are associated with proposed trails. Cabins in the national park would complement cabins proposed for the state park in the *Denali State Park Master Plan*. The State is supportive of public use cabins where consultation with DFG has shown that impacts to subsistence users can be avoided.

Page-specific comments

Pages 3-4: The *Denali State Park Master Plan* does not propose a visitor center in Talkeetna.

Page 9: The *Denali State Park Master Plan* still proposes visitor facilities in the Tokositna area, although they are of a smaller scale, and more specialized, than those contemplated by the DCP.

Page 40: The EIS unnecessarily restricts the area for the Alternative B visitor center to within 1/2 mile of the Parks Highway. The *Denali State Park Master Plan* identifies a much larger area, around 8,000 acres, for site selection. The DCP also incorrectly assumes that the State would build employee housing associated with the large visitor center.

Page 64: The plan notes that the weather on the south side of park is not as good for views of the Alaska Range as the north side. Since this is one of the main reasons people go to the park, the plan does not address how this limitation affects the desires of visitors, and what impact this fact will have on facility development.

Page 74: Denali State Park does have a site listed on the National Register of Historic Places. It is the Curry Lookout, a mountain viewing facility built in 1923 by the Alaska Railroad for patrons of the Curry Hotel. It is located on Curry Ridge.

Pages 152-153: The cost estimates for the northern visitor center in Alternative B are identical to those of the Talkeetna center in the Proposed Action. This is unlikely, since the Talkeetna site has better road access and access to utilities and other support facilities. Building an identical facility in the state park would be much more costly than in Talkeetna.

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION

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April 5, 1993

Mr. Russ Berry
Superintendent
Denali National Park and Preserve
PO Box 9
Denali Park, AK 99755

Dear Russ,

Neil and I appreciated the chance to meet with you last Friday and discuss the progress of the South Slope Development Concept Plan. We continue to have a strong interest in this project, both for its potential to improve the Denali region's attractiveness as a visitor destination and its effects on state lands and resources.

Frankly, we were left a bit confused about the project and our role. Because several of the DCP's recommendations will effect state lands, there are obvious advantages in the state and NPS having a close, cooperative relationship during the formulation of the plan. Regular state involvement would greatly increase the likelihood of plan recommendations for state lands actually being implemented.

We understood that I was to be a full member of the planning team, involved in team discussions formulating alternatives and selecting the preferred alternative. But our meeting last week was the first contact I have had with the National Park Service in many months. Clearly, a lot of progress has been made without state participation. Now we are asked to review a few pages taken from a larger draft, without maps or other supporting information.

Because of the importance of this process and the complexity of its issues, we have concluded that comments based on a partial review, potentially out of context, would be inappropriate. We will wait until a complete draft DCP/EIS is available for review, and then forward our comments to the state Division of Governmental Coordination, for incorporation into consolidated state comments.

In the meantime, however, I can review for you the state's past concerns and positions. First, the Hickel administration supports a large visitor center in Talkeetna, to be developed in cooperation with Cook Inlet Region, Inc, serving rail-oriented demand. Second, we also support a smaller visitor center in

Denali State Park, serving independent, highway travelers. The **Denali State Park Master Plan** identifies two areas for such a center, in the park's north and south ends. The alternatives you presented us last week provide only for the southern site, which potentially creates a problem. Third, because the Parks Highway provides ideal viewing conditions, we support a series of pullouts with interpretive features, comfort facilities, short loop trails, etc. And finally, proposals for trails, trailheads, and boat launches must be investigated for consistency with state plans and land classifications as well as ownership and other land status issues, for state lands inside and outside the park. One alternative lists five trailheads on state land.

I hope this letter is helpful. Although we are not able to offer detailed comments at this time, we intend to work with you as the project advances through the formal public review process. And while our experience as part of the planning team has been disappointing, we remain excited about the project and welcome any opportunity to assist with work sessions, field work, and site investigations.

Sincerely,

(Signed)

David Stephens
Chief, Policy and Planning
Alaska State Parks

cc: Neil Johannsen, Director, Alaska State Parks
Ron Swanson, Division of Land
Sally Gibert, Division of Governmental Coordination