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December 9, 1994

Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, Alaska 99755

Dear Mr.  Martin:

The State of Alaska has reviewed the November 1994 Environmental Assessment (EA) on the proposed construction of visitor transportation facilities for Denali National Park and Preserve. This letter represents the consolidated views of the State's resource agencies.

This revised EA is much improved compared to the original version dated July 30, 1994. The expanded alternatives and discussion present a more complete overview of the context of the issues and management decisions. There are, however, continuing concerns about the EA and the underlying visitor transportation system (VTS) concession contract. The State is not prepared at this time to pass ultimate judgement on this EA, but will list some significant issues and questions that remain. These questions may address the EA, the concession contract, or both.

Before elaborating on our "process" concerns, the following summarizes the State's views on the specific alternatives, most of which have been stated previously.

- * The State strongly supports the construction of housing dedicated to VTS employees.
- * The State supports decision-making criteria which favor keeping the operation of the VTS and the tour bus systems separate and distinct.
- * The State does not object to placing the VTS facilities inside the park, and in fact favors keeping them in the park to facilitate NPS oversight and long-term control, and possibly lessen community and transportation impacts associated with a site outside the park. At the same time, the State urges the NPS to work closely with Ahtna (pursuant to ANILCA Section 1306), and the Denali Borough to address their preferences as well.

Questions and Process Concerns

- * Why is there no preferred alternative in the revised EA?

Are there other outstanding issues and information that would affect a selection? If so, shouldn't these be included in this public review document? If there are issues or criteria which are not reflected in the current EA, then it is again deficient.

- * Have traffic impacts on the George Parks Highway been addressed?

The EA fails to address traffic-related impacts which would result from the location of a bus facility outside the park. In particular, there is no mention of the additional congestion along the road, or of access to and from the site. Under this alternative, what mitigating provisions could or would be made to handle potentially dangerous left-turn traffic along the highway? If a site outside the park is selected, it will be very important to work with the landowner, the Borough and the Alaska Department of Transportation and Public Facilities to address such "secondary" impacts.

- * What are the implications of having no new buses for 1995?

Page 5 of the EA notes that buses will be operational at the beginning of 1995. But with the delay in selecting the proper bus type and size, and the delay in ordering these buses, there will be no new buses available for the 1995 season. What buses will be used? Since the public has been presented with an expectation that the new user fee is tied to a more comfortable bus ride, will the new fees be reduced while the improved buses are on order?

- * Since there will be no new buses for 1995, what arrangements are being made the in lieu franchise fee?

Conclusions

The issues surrounding this EA and the bus contract are indeed complex. The State continues to conceptually support many aspects of the new bus system. However, there are many outstanding questions that have not yet been addressed. Unfortunately, the scope of this EA does not (and cannot) include all aspects of the bus contract debate. We urge the National Park Service to continue working with all interested parties in defining and addressing the questions and concerns which have been raised to date.

Thank you for the opportunity to provide these comments. If you have any questions, please call me at 561-6131.

Sincerely,


Sally Gibert

State CSU Coordinator