



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

ANILCA Implementation Program

Office of Project Management and Permitting

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May 30, 2019

Donald Striker, Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

Dear Mr. Striker:

The State of Alaska reviewed the Access and Use Request, Ruth Glacier, Mountain House LLC Environmental Assessment (EA). The following comments represent the consolidated views of state resource agencies.

The National Park Service (Service) proposes to issue a Right of Way Certificate of Access (RWCA) to re-align an existing stairway and construct a new section of stairway across park lands to access an inholding on the Ruth Glacier within Denali National Park. The Service's preferred alternative also proposes to issue a Special Use Permit (SUP) for the use of two storage sites adjacent to an existing landing strip for staging purposes and helicopter transport of cargo by sling load, both in support of business operations on the inholding. We support the intent in Alternative 2 to authorize these activities.

Section 1110(b) of the Alaska National Interest Lands Conservation Act (ANILCA) grants state and private inholdings within conservation system units "...such *rights* as may be necessary to assure *adequate and feasible access for economic and other purposes*" (Emphasis added). Since the storage sites and sling load operation support lodge operations on the inholding, they could also be included as part of the RWCA. Department of Interior implementing regulations at 43 CFR 36.10 define "adequate and feasible access" and identify the decision criteria that the agency must follow to ensure the route and method of access *both* meet the use and development needs associated with the inholding and protect surrounding park resources.

According to NPS Reference Manual #53, a SUP may be issued for up to five years. If the storage sites and sling loading operations are authorized under a SUP, we request the Service consider providing a longer term to better accommodate the applicant's request for authorization "in perpetuity" and allow for a more predictable business model.

Thank you for this opportunity to comment. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee".

Susan Magee
ANILCA Program Coordinator