

## Chapter Six: Public Comments and Response

### Characterization of Comments Received

Agency staff received comments from 72 people on the Draft South Denali Implementation Plan. This total includes both written comments and verbal comments made during five public hearings held in 2005 in Anchorage (October 19), Wasilla (November 3), upper Susitna Valley (November 2), Denali Park (October 26), and Fairbanks (October 27). Comments were received from agencies, organizations, and individuals. Comments from individuals included verbal testimony, personally written letters or e-mail messages. The number of comments received from each source is as follows:

<b>Agencies</b>	<b>3</b>
<b>Organizations</b>	<b>14</b>
<b>Individuals</b>	<b>55</b>
<b>TOTAL Comments</b>	<b>72</b>

Some individuals and organizations provided testimony at the public hearings, and they also submitted written comments. Some individuals also submitted more than one written comment. In these instances, park staff consolidated multiple comments from one source to preserve the entire substance of the comments, but counted each individual only once for tallying purposes.

Many comments expressed a preference for one of the alternatives although there were a substantial number that commented only on specific issues or requested a modification even in the alternative they preferred. General preferences are indicated in the table below.

	<b>No Alt Selected</b>	<b>A: No Action</b>	<b>B: Peters Hills</b>	<b>C: Parks Hwy</b>	<b>Conditional Support of C</b>
<b>Agencies</b>	3	0	0	0	0
<b>Organizations</b>	4	2	2	5	2
<b>Individuals</b>	24	10	1	6	13
<b>Total Number of Comments</b>	<b>31</b>	<b>12</b>	<b>3</b>	<b>11</b>	<b>15</b>

Most of the individuals who did not indicate a preference for a particular alternative, and most of the individuals who expressed conditional support for Alternative C asked the agencies to do one or more of the following: adopt land use controls to protect the scenic qualities of the Parks Highway, complete wildlife inventories in the state park, mitigate conflicts between motorized and non-motorized use in the South Denali region, and develop a funding plan for the new facilities.

In addition, 28 surveys from miners and interested parties in the Yentna Mining District, and a petition with 2000 signatures, were submitted. Twenty-five out of 28 responses to the survey, and all 2000 names on the petition, indicated an objection to development in the Peters Hills.

Extracts of substantive comments appear below accompanied by the agency response.

## **Response to Comments from Agencies**

### Environmental Protection Agency

1. Please note that a National Pollutant Discharge Elimination System (NPDES) permit is required for construction projects that disturb more than one acre (40 CFR 122.26 (b)). We recommend that the Final EIS include information about this permit. Although acreage of wetlands that would be disturbed under Alternative C actions is relatively small, impacts to wetlands should be avoided whenever possible, and unavoidable impacts should be mitigated.

*Response: The requirement for the National Pollutant Discharge Elimination System permit is included in the Final plan in Chapter One in the section called Permits and Approvals Necessary to Implement the Plan. Mitigation measures for wetlands are included in the Mitigation section in Chapter Two of the Draft and Final plans.*

2. The Draft EIS states that the planning team held discussions with tribes. However, there was no information about the substance or outcome of these discussions. We recommend that the Final EIS include information on the process used to consult with local tribes and outcomes of such consultations.

*Response: Chapter Five: Consultation and Coordination was amended to include additional information about the substance and outcome of the planning team's discussions with tribes.*

3. The Draft EIS clearly indicates that public comments on the proposed action were solicited and considered. We recommend that the Final EIS include a discussion of how the major issues were addressed.

*Response: The Draft and Final plans include a discussion of issues addressed during scoping. Chapter Five of the Final plan was expanded to include a discussion of the agency response to major issues that arose during scoping. Additionally, Chapter Six: Response to Comments in the Final plan contains the agency response to all substantive comments received on the Draft plan.*

Alaska Department of Fish and Game

4. Chapter 3, page 51. Stream names need to be added to the table on page 51.

*Response: The stream names that were inadvertently left out of the Draft plan were added for the Final.*

5. Chapter 3, page 73. For accuracy and to be more current, the following passage in the second paragraph - "The tule goose is a subspecies of greater white-fronted goose that nests primarily in wetlands on the west side of Cook Inlet, including very low nesting densities from the Yenta River drainage to the Tokositna River drainage within and adjacent to Denali's boundaries (Ely and Dzubin 1994)." should be replaced with the following text: "The Tule goose is a subspecies of greater the white-fronted goose that nests primarily in the lower Susitna Valley, but also in small numbers along the western shore of Upper Cook Inlet from the Susitna River south to Redoubt Bay. The primary nesting grounds extend between the Yenta River drainage and the Susitna River, north to include the Kahiltna Valley and lower Tokositna River drainage adjacent to Denali National Park. This area is used by the entire population during migrations in May and August. The Upper Kahiltna Valley has been a primary molting site for more than 1,000 Tule geese in midsummer."

*Response: This change was made in Chapter Three of the Final plan.*

6. Chapter 3, page 108 and 109. The reference to "sport hunting" should be corrected on page 108 by deleting the word "sport" and only referring to "hunting." The state regulates general hunting and subsistence hunting and does not use the term "sport." The second paragraph on page 109 should be reworded as follows: "Most of these species are harvested for subsistence and personal use." The reference to ANILCA should be deleted because this section discusses hunting on state land and ANILCA does not apply. State subsistence law currently includes all residents as subsistence users in areas where subsistence uses are authorized in State regulation.

*Response: This change was made in Chapter Three of the Final plan.*

## **Response to Comments from Individuals and Organizations**

### **Land Use Controls**

7. All of the following regulatory activities should occur prior to ground breaking activities. Monitoring and enforcement activities should be specific and feasible before infrastructure is developed. Chaotic, haphazard strip development will happen if land use controls are not created, adopted, and enforced.

- a. Scenic Highway designation for the Parks Highway corridor between MP 105-132
- b. Regulation of land uses adjacent to the Parks Highway corridor

- c. Matanuska-Susitna Borough should keep land along the Parks Highway corridor in public domain
  - d. State of Alaska Department of Natural Resources should zone private lands within Denali State Park
  - e. Revise the Denali State Park Special Land Use District to provide maximum protection of the scenery along the Parks Highway corridor
- (Denali Citizens Council, Alaska Center for the Environment, National Parks Conservation Association, Mat-Su State Parks Citizens Advisory Board, Friends of Mat-Su, Alaska Quiet Rights Coalition, Talkeetna Community Council, and 22 individuals)

*Agency Response: The agencies are committed to protecting the Parks Highway corridor from MP 105 through Denali State Park from unwanted strip development. The agencies agree that haphazard development is likely if controls are not in place. The agencies intend to adopt land use controls before the visitor center is constructed. The following is a point-by-point response to the bulleted list above:*

*a) Scenic Highway Designation. The Parks Highway corridor between MP 105-132 can be designated as a state scenic highway if the Matanuska-Susitna Borough and the local community both send resolutions to the State Department of Transportation and Public Facilities. The preferred alternative of the Final South Denali Implementation Plan includes a commitment by the agencies to support such designation. The initial action must come from the local community. The agencies would provide facilitation and technical support as necessary if the local community requests it. Once that section of highway acquires state designation, the local community can apply for a federal scenic byway designation. Again, the agencies would provide facilitation and technical support as necessary if the local community requests it. The preferred alternative of the Final plan makes this commitment more explicit.*

*b) Regulate land uses adjacent to the Parks Highway corridor. The preferred alternative of the Final plan includes the following actions. The agencies would work cooperatively to create a contiguous scenic buffer on agency held lands adjacent to the Parks Highway from MP 105 - MP 132 for the purpose of protecting the scenic and natural aspects of the highway corridor. The scenic buffer would provide reasonable access to public and private lands, and allow for appropriate uses consistent with the intent of the buffer. Additionally, the agencies would cooperate in developing context-sensitive design standards that would apply to appropriate agency held lands adjacent to the scenic buffer. The Matanuska-Susitna Borough would also work with local communities to establish land use controls for private lands along the Parks Highway.*

*c) Keep land along the Parks Highway corridor in public domain. In the Final plan the agencies have proposed a scenic buffer along the highway corridor that would allow for access to other public lands, as well as accommodate appropriate uses within the buffer. In the near future, the Matanuska-Susitna Borough intends to classify their lands in the corridor area through a public*

*process, which would be the appropriate forum for the public to voice their interest in retaining these lands in public domain.*

*d) Zone private lands within Denali State Park. Private lands within Denali State Park are already zoned by the Denali State Park Special Land Use District (SPUD). The preferred alternative of the Final plan acknowledges the Alaska Department of Natural Resources commitment to work with the Matanuska-Susitna Borough, which is the local government with local authority to zone, to update the current SPUD to include controls such as specific setback and design standards, building height restrictions, vegetative buffer requirements and requirements for the use of wildlife-proof garbage storage containers.*

*e) Revise the Denali State Park Special Land Use District. The following mitigation measure was added to the preferred alternative of the Final plan to address this concern: The Alaska Department of Natural Resources would work with the Matanuska-Susitna Borough to update the current SPUD to include controls such as specific setback and design standards, building height restrictions, vegetative buffer requirements and requirements for the use of wildlife-proof garbage storage containers.*

## **Funding**

8. The cost of this project is quite large, and the availability of public funds for yearly maintenance costs is highly questionable. The funding approach to be used in allocating both public and private money for support services is important and hardly covered in this document. Concession and other business contracting are not discussed. Although fees will be an important part of the overall funding structure, these are public facilities and fees should not be burdensome. We are concerned that budget cuts to operations have already reduced staffing at both Denali State Park and Denali National Park. How will this plan buck the tide of reduced public funding over the next few decades? This project should not move forward without practical consideration of how ongoing annual costs are going to be funded. Prove that adequate enforcement and staffing, from backcountry rangers to staffing at the visitor center is possible before entertaining a project of this potential size.

(Denali Citizens Council, Alaska Center for the Environment, National Parks Conservation Association, Mat-Su Area State Parks Advisory Board, Friends of Mat-Su, 15 individuals)

*Agency Response: The agencies are committed to securing funding to staff and operate new facilities. They intend to generate revenue through concession fees, user fees, and permit fees. The agencies would utilize volunteers for some staffing needs such as campground hosts and information aides. The facilities would be operated through a partnership between the State of Alaska and the National Park Service, and would rely on both state and federal legislatures for additional funding. The planning team will develop an operating plan after a Record of Decision is signed for the Final South Denali Implementation Plan and EIS.*

## Operations

9. The preferred alternative talks about building facilities and installing generators but ignores completely the suggestion of acquiring power by connecting to the grid.  
(ASSA, 2 individuals)

*Agency Response: The planning team is also interested in acquiring power for the new visitor center. At this point in the planning process we cannot guarantee that power from the existing railbelt power grid would be brought to the site; however, if it appears feasible during the design phase, we would incorporate it into the design. There would still be a need for generators for emergency power, albeit smaller and run only when there was an outage. These operational details would be developed during the subsequent design phase for this project.*

10. The visitor center can promote sales of local books, art, crafts, and souvenirs rather than mass-produced foreign knock-offs. The NPS sponsors a work area at the Totem Park in Sitka (Sitka National Historical Park), which, among other things, educates tourists on what to expect in an Alaskan handicraft. Similar efforts here, perhaps involving Yupik as well as local artists, would mitigate and offset negative impacts and should be written into this plan.

There is also concern about the necessity and scale of services like food service, bookstore, and theater at the visitor center. What is the function of the food service building on the map? One person commented that services should be scaled back, and one person expressed concern about those operations competing with nearby businesses. One person commented that the decision to have food service at the visitor site is an excellent one, but only if the opportunity to provide concessions services is given to small local businesses, as in a food court setting.

(4 individuals)

*Agency Response: The vision is for a high quality facility that offers a range of opportunities for learning and recreating. The exact type and scale of services provided at the visitor center would be determined through the subsequent design phase for this project, and public input would be solicited. The Final plan notes that all descriptions and drawings are conceptual. The concept for food service is that food would be available for purchase at the visitor center. Details of what type of food and who would provide it would be developed during the subsequent design phase.*

11. During shoulder hours and shoulder seasons, when it is not economically viable for a shuttle system to operate, private vehicles should be allowed and a parking area sufficient to accommodate them should be constructed at the Curry Ridge site.



*Agency Response: The agencies share this vision and language was added to the Final plan to make that vision more explicit. Six parking spaces would be provided in the preferred alternative to accommodate private vehicles during non-peak times.*

12. We recommend that not all of the buildings be constructed at that location but be placed closer to the Parks Hwy so that the public can access the facility year round.  
(2 individuals)

*Agency Response: One of the criteria used to evaluate locations for a new visitor facility is that it offers a destination experience where visitors feel as though they're in a wilderness setting and cannot see or hear the highway. The project team evaluated sites closer to the Parks Highway but found that these sites did not meet selection criteria. Depending on demand and funding, part or all of the visitor center could be open year-round. The parking area could be open and plowed in winter to serve winter recreation users. The road could also be open in winter, although it probably wouldn't be plowed because of maintenance costs.*

13. Please make Alternative C a summer-only facility. Do not allow snowmachines access from the new facilities because they will come on private property.

*Agency Response: Demand for the visitor would be far greater in summer than in winter. However, if demand is sufficient, parts of the facility could be open in winter. This is consistent with the project goals of enhancing visitor and recreation opportunities for a wide range of visitors. When there is adequate snowcover, snowmachine use is currently authorized in Denali State Park; this plan does not propose changes to existing regulations. The agencies believe that snowmachine users who access Curry Ridge would do so via the proposed access road. This would help keep snowmachine users on park land and away from private property.*

14. The role and influence of the package tour industry is unclear. How will this industry influence the final design and use of the facilities at the visitor center?  
(1 individual)

*Agency Response: The design phase would include opportunities for stakeholder involvement in the facility design and proposed operations. All comments would be considered.*

15. Make this facility a model NPS can be proud of for its use of renewable energy sources.  
(1 individual)

*Agency Response: The preferred alternative of the Final plan makes a commitment to use renewable energy sources when practical (see Mitigation section, Chapter Two). Specific designs would be determined during the design phase for this project.*

16. Maintaining a balance between general public access and access by the package tour industry to the visitor center will be important. The plan should provide guidelines for maintaining this balance. Without a prior determination of carrying capacity, state park managers have no way to counteract the ever-increasing demands of industrial tourism. That being the case, we recommend that the Final plan and EIS contain a scheme for regulating future usage of the Park, such as a permit system for accessing various trails or annual quotas limiting the number of visitors each tour company can bring in any one year. (Denali Citizens Council, Alaska Quiet Rights Coalition, 2 individuals)

*Agency Response: The operating plan will evaluate the need for allocation between commercial and non-commercial use of new visitor facilities. Carrying capacity and quota systems could be evaluated in an operating plan.*

17. The plan needs a rail system from the highway to the visitor center.  
(1 individual)

*Agency Response: The agencies evaluated various alternative transportation methods to bring visitors from the parking area to the visitor center. A bus system was determined to be the most appropriate, feasible, and cost-effective option.*

## **Trails**

18. Denali State Park needs a trails plan. If there was a trails plan in place that specified the way trails are to be constructed and maintained it would be better for the visitor experience as well as the environment. Right now trails are nothing more than narrow footpaths. These trails do not meet the needs of the public as a whole. We need trails that families with young children, seniors, and disabled people as well as the elitists can use.  
(2 individuals)

*Agency Response: The new trail system adjacent to the visitor center would provide opportunities for visitors with a wide range of abilities. Federal funding and State of Alaska standards require facilities (including trails) be constructed in accordance with the guidelines for accessibility to places of public accommodation. The Americans with Disabilities Act of 1990 standards and the Accessibility Guidelines for Outdoor Developed Areas would be incorporated into the project's design recommendations. A park-wide trails plan may be developed by State Parks at some time in the future.*

19. The mention that 19 miles of new trails will be constructed is fine for the summer but to imply that they would be available in winter is misleading, except for the comment about maintaining trails for Nordic skiing. What about maintaining trails for snowmobiling?

*Agency Response: The goal of the plan is to enhance recreational opportunities in the South Denali region for a wide range of users. Both Draft and Final plans propose enhancing the experience for snowmachine users in the South Denali region by seeking dedicated trail easements and constructing a primitive trail for*



*the regionally significant Chulitna Bluff/Rabideux/106 Seismic Winter Trail System; by improving parking areas for snowmachine users along Petersville Road and the Parks Highway; by adding signs along the legally dedicated portions of the trail system in the planning area for user safety; and by providing local groups with technical assistance in securing funds for marking and grooming winter trails in the South Denali region and grooming Petersville Road from Kroto Creek to the Forks Roadhouse. In addition, the new access road to the visitor center in the preferred alternative would greatly improve access for snowmachine users to Curry Ridge. The agencies believe that constructing 13 miles of summer trails is equitable and that the Final plan enhances recreation opportunities equally for summer and winter users.*

20. I would like to see a winter route that connects two of the trails that are in the Matanuska-Susitna Borough's trails plan. The first trail is the Safari Lake Trail that ends at the state park line near Bunco Creek. The second trail is the Chulitna Bluff trail that ends at the state park line at Moose Mire Lake. If these two trails were connected and maintained it would make a loop for people who want to stay on maintained trails. I also feel that parking areas within Denali State Park should be maintained in the winter for those folks (all user groups) who want to visit the park.  
(1 individual)

*Agency Response: There are currently two routes that connect the northern end of Kroto-Bunco Lake Trail with the northern end of Chulitna Bluff Trail. These are informal trails with no trail signage, grooming or maintenance being performed at this time. One route goes off the end of Kroto-Bunco Trail, crosses the Tokositna River, turns eastward over the swamps and crosses the Tokositna River a second time, wraps around the northern side of the two hills in Sections 34 and 35, T29N, R06W, S.M., Alaska, turns southeast across the swamps and ties into the northern end of the Chulitna Bluff Trail. The second route goes off the northern end of the Kroto-Bunco Trail, follows the Tokositna River then veers southeast across the large swamp northwest of Swan Lake, heads onto the uplands at the northern tip of Swan Lake and generally heads east, passes to the south of the two hills in Sections 34 and 35, T29N, R06W, S.M., Alaska, crosses the swamps passing south of Moose Mire Lake and reconnects with the northern end of the Chulitna Bluff Trail. Both the Kroto-Bunco Trail and the Chulitna Bluff Trail have legal public use easements and are groomed, signed and maintained by the Curry Ridge Riders under a Trail Care Program agreement with the Matanuska-Susitna Borough (MSB). The northern portion connecting these trails is within Denali State Park. No easements are required for trails within the state park and snow machines can use the area provided there is adequate snow cover. State Parks does not mark and groom trails that follow frozen rivers. Identifying a formal connecting route outside of the state park and issuing an easement to allow grooming, signage and maintenance for a loop trail could also be considered in the future. If this winter route is feasible, it would need to be placed on the Matanuska-Susitna Borough's priority list of identified trails that need dedication. The MSB would submit an easement application to DNR Division of Mining, Land and Water, Southcentral Regional*

*Office (SCRO). SCRO would then pursue a formal public process in order to adjudicate this potential route.*

*In an effort to provide for winter recreational use and emergency pull-out areas, the Denali State Park Master Plan Amendment does recommend that State Parks continue to coordinate with the Alaska Department of Transportation and Public Facilities to plow parking areas along the Parks Highway and particularly the Veterans Memorial.*

21. The 1997 South Side plan included several hiking trails near the end of the Petersville road including at least one route that provided access into the national park. In an effort to improve opportunities specifically in the national park we request you consider reinstating this hiking route into the final alternative.

(National Parks Conservation Association)

*Agency Response: During scoping and throughout this planning process residents commented that the agencies should maintain in the Peters Hills opportunities for primitive recreation, and that facilities should be focused along the Parks Highway corridor. Opportunities to access the south side of the national park are provided by river systems, air taxis, and on foot for those who desire a high level of challenge and adventure. A constructed trail from the Peters Hills to the national park boundary was proposed in Alternative B. It was not included in the preferred alternative because the proposed trails closer to the Parks Highway and eastern end of the Petersville Road would receive more use and would be easier to maintain. The trails proposed in the preferred alternative would not require upgrading the northern half of the Petersville Road to access a new trailhead. Parts of the 1997 plan that propose trails near the end of Petersville Road could be implemented in the future with additional planning and environmental compliance.*

22. I think Curry Ridge could be managed for low speed snowmachine touring on a marked trail with no riding allowed off the trail. I think a snowmobile trail system should be created that is scenic, routes motorized use around sensitive wintering wildlife habitat, and is safe for multi-use.

(2 individuals)

*Agency Response: Operational details will be worked out in the subsequent phases of this project. The planning team will consider these suggestions.*

23. Ascertain if the new East-West Express Trail has alleviated some of the unrestricted snowmachine use or only added to the conflicts.

(2 individuals)

*Agency Response: A benefit for having the east-west trail emerge from Mile 121.5 of the Parks Highway is the relief of traffic congestion along the Petersville Road corridor and specifically the Kroto Creek parking area. In the future the agencies could conduct a broad study of impacts of motorized use in the South Denali region.*

24. I would like to see the agencies cooperatively implement and secure financial resources towards some non-motorized trails.

(2 individuals)

*Agency Response: Though the state has the authority to manage non-motorized trails on state lands outside of Denali State Park, this authority is restricted by AS 38.04.200. This statute mandates that the state cannot manage general state land so that traditional means of access for traditional activities is restricted or prohibited. The state can however, establish new non-motorized trails where there is no previous history of motorized use establishing traditional access. The state is willing to work with the agencies or groups, if it is feasible, to establish these types of trails. This would require a separate public process to adjudicate. Within Denali State Park, new non-motorized trails can be established.*

### **Motorized and Non-motorized Use Conflicts**

25. The preferred alternative of the Final plan should reduce the capacity of the MP 121.5 and MP 122 parking lots. Adopt a phased approach for each parking area, and commit to building only after potential hazards and conflicts can be mitigated and regulations enforced.

(Denali Citizens Council, 2 individuals)

*Agency Response: The preferred alternative of the Final plan calls for a phased approach for these parking lots (see Chapter Two of the Final plan and Appendix C: Plan Implementation in the Draft and Final plans). The preferred alternative of the Final plan clarifies that these parking lots would be expanded in phases depending on availability of funds and demand, as determined by the agencies. If unacceptable resource damage or conflicts occur as a direct result of expanding these parking lots, the size of the lot would not be increased further until resource damage or conflicts are mitigated.*

26. Expanded and new parking areas south of the park and intended for winter use should not be built until snowmachine issues are further resolved.

(2 individuals)

*Agency Response: The goal of the plan is to enhance recreational and access opportunities for a wide range of users. One of the ways agencies can enhance opportunities for snowmachine users is by providing new and expanded parking areas. The Matanuska-Susitna Borough Parks, Recreation, and Trails Advisory Board exists to resolve conflicts between motorized and non-motorized users outside of Denali State Park. The Board is required to have broad representation by district and user group. The Matanuska-Susitna Area Citizen Advisory Board fills this purpose within Denali State Park.*

27. The plan must mandate the formation of a Citizen-Agency Committee to mediate conflicts between motorized and non-motorized use, establish guidelines and develop enforcement plans.

(Denali Citizens Council, 1 individual)

*Agency Response: The Matanuska-Susitna Borough Parks, Recreation, and Trails Advisory Board already fills this purpose outside of Denali State Park. The Board is required to have broad representation by district and user group. The Matanuska-Susitna Area Citizen Advisory Board fills this purpose within Denali State Park.*

28. The plan has statements that indicate agencies cooperatively implementing sections of the Matanuska-Susitna Borough Trail Plan Master Plan but doesn't appear to address the desired motorized trail along the Petersville Road, nor does it address funding for the described improvements. The document has vague statements about supporting efforts by others to get funding to mark and groom winter trails but avoids taking responsibility for developing and maintaining them, as they do for summer facilities. They will build and maintain summer trails all over the place but appear to want no part of winter trails.

(Alaska State Snowmobile Association, 1 individual)

*Agency Response: Separate from this South Denali planning process, DNR's Southcentral Regional Office (SCRO) is working to reserve year-round public access easements that are identified in the Matanuska-Susitna Borough Recreational Trails Plan. Once the easements are reserved, SCRO works cooperatively with the MSB and local trail groups to mark, groom and maintain winter trails. This includes working cooperatively to locate funding sources.*

*At this time, the Matanuska-Susitna Borough does not have the funding or personnel to take on the responsibility for developing and maintaining winter or summer trails outside borough-managed parks. The MSB Recreational Trails Plan contains specific language that promotes an adopt-a-trail program with the objective of encouraging volunteers and non-profits to develop and maintain trails in order to minimize costs to the borough. MSB currently supports these volunteer efforts by funding; through the bed tax grants program; and the signing, grooming and maintenance of winter trails by trail user groups and organizations who have entered into a Trail Care agreement with MSB.*

*The Alaska Division of Parks and Outdoor Recreation administers two grant programs, the National Recreational Trails Grant Program and the SnowTRAC Program, that promote trail development, easement acquisition, and trail grooming and maintenance. The National Recreational Trails Grant Program requires that 30% of monies allocated go to motorized trails, 30% go to non-motorized trails, and 40% go to multi-use trails. The SnowTRAC Program is funded through snowmachine registration monies and requires funds to be used solely for snowmachine trail development and grooming.*

*The Alaska Department of Transportation and Public Facilities cannot use federal highway funds to construct motorized trails along State-owned roads. State law allows use of the right-of-way by off-road vehicles with certain restrictions.*

29. A huge concern when ski trails are mentioned is the inevitable push by some to prohibit snowmobile access as soon as they start skiing.

(Alaska State Snowmobile Association, 1 individual)

*Agency Response: Snowmobile access within Denali State Park is regulated by 11 AAC 20.425 and 11 AAC 20.935, to be open only when it has been determined that there is adequate snow cover. Though there may be some new trails designated within the park for skiers, other areas would remain open pursuant to regulation. The use of snowmobiles on general state lands outside of the state park, just like skiing, is considered “generally allowed” and subject to certain conditions as described in 11 AAC 96.025. The state can create restricted non-motorized trails on general state land as long as there has been no previous history of motorized use that would establish a traditional use. This type of trail establishment would require a separate public process.*

30. New or expanded parking areas will encourage even more snowmachine use on general state land and exacerbate already serious problems; they will not facilitate non-motorized winter use because few such users can have an enjoyable time while competing with motorized recreation. Safety, noise, noxious fumes, lumpy paddle tracks, moguls, icy and bumpy surfaces, degraded snowscapes, loss of wildness, and lack of solitude are all substantial issues for most non-motorized users and residents.

Is it fair to manage winter recreation on the vast majority of our public lands for the benefit of motorized recreation (again, the form of recreation which creates the most harmful impacts and the most conflicts) at the expense of non-motorized recreation? The solution is simple. On the millions of acres of public lands in this region and throughout the state, set aside a reasonable number of areas, both near the road and remote from the road, on both beginner and more challenging terrain, screened from motorized recreation either spatially (an example is Chugach State Park) or temporally (an example is Resurrection Pass), for non-motorized recreation. Where, incidentally, are the 324 miles of non-motorized winter trails in the area (p. 117)?

(National Parks Conservation Association, 6 individuals)

*Agency Response: Many existing parking areas already experience overflow issues and would continue to do so as the area becomes more popular, particularly on weekends and holidays. Additional parking areas along the Parks Highway would divert some of the use off the Petersville Road, alleviating some of the traffic congestion and overcrowded parking areas on Petersville Road.*

*The access easements reserved for trails over public lands are usually for specific widths but usually not for specific purposes (such as motorized versus non-motorized). The management of these easements is not intended to favor one user*



*group over another, although it may be fair to say that the majority of trail users, especially in the backcountry and areas away from the road system, are motorized trail users. Non-motorized trail users are not required to remain within these easements except where they cross private lands.*

*Though the state has the authority to manage non-motorized trails on state lands outside of Denali State Park, this authority is restricted by AS 38.04.200. This statute mandates that the state cannot manage general state land so that traditional means of access for traditional activities is restricted or prohibited for the purpose of protecting aesthetic values of the land or water. The state can establish new non-motorized trails where there is no previous history of motorized use establishing traditional access. The state is willing to work with the MSB and other groups, if it is feasible, to establish these types of trails. This would require a separate public process to adjudicate.*

*Regarding the 324 miles of non-motorized winter trails, this figure was interpreted incorrectly, and language in Chapter Four of the Final plan was amended to more accurately characterize miles of trails in the planning area that are available to non-motorized users. The majority of trails in the planning area are designated multiple-use, and non-motorized trail users are welcome to use them. There are approximately 196 miles of multiple-use trails in the West Petersville area, and approximately 61 miles in the Petersville-Trapper Creek area. The approximately 95 miles of trails in Denali State Park are for non-motorized use only in the summer and there are no designated multi-use winter trails at this time.*

31. I recommend prohibiting snowmachining on Curry and Kesugi ridges, where the riding opportunities are far less than optimal, and where the generally windblown terrain is inappropriate for this activity in any case (recognizing also how difficult it is for State Parks to monitor those conditions). I recommend the road to the visitor center as well as the surrounding area and trails be closed to snowmachining. Designating some areas as non-motorized would provide opportunities for a wider diversity of park users. And most of this area is classified as Wilderness (p. 92). How wild is an area if the most powerful, noisiest, fastest modern technology is allowed there (in unlimited numbers to boot)? (National Parks Conservation Association, Alaska Quiet Rights Coalition, 4 individuals)

*Agency Response: Snowmobile use within Denali State Park is already restricted by regulation, 11 AAC 20.425 and 11 AAC 20.935, to be open only when it has been determined that there is adequate snow cover. The 'wilderness' designation used in the Denali State Park Master Plan Amendment is an administrative term and has no relationship to federal lands designated "Wilderness" under the Wilderness Act or the Alaska National Interest Lands Conservation Act. Under the Amendment's wilderness designation, snowmobile use is compatible subject to existing regulations.*

*The goal of the plan is to provide opportunities for both summer and winter recreation. The road to the visitor center could provide additional winter recreation*



*opportunities. In Denali State Park, winter trails could be developed and select trails could be improved for winter use. Winter uses of the park in some areas could be separated or restricted to minimize conflicts between user groups and protect park resources.*

### **Off-road Vehicles (ORVs)**

32. Increasingly, non-snow season ORVs are used not just for hunting, which was usually the case formerly, but for non-hunting recreation as well. The damage caused to soils, vegetation and scenic beauty by unmanaged ORV use, both for hunting and now other purposes, is truly atrocious. Every year old trails are being widened, and new “social” trails are being created, deeper and deeper into once wild backcountry. With very few exceptions (some beaches, for example) ORVs should not be allowed to travel on Alaska’s public lands except on trails, and only those trails that have been designated open after a careful analysis of the effects of that use.

Nodes of camping and parking near Kroto Creek, the Forks Roadhouse, and along the Parks Highway would encourage relatively unregulated motorized backcountry use. There are already a number of ORV ruts in the vicinity of Petersville Road, visible from the air. Trails must be marked and their use enforced. Before this access is facilitated, the plan must mandate an affordable enforcement and monitoring strategy.

A few actions that will help, but not adequately solve, the problem of ORV use in the summer and snowmachine use in the winter are mandating that trails be physically in place, maintained, signed, and a trail etiquette kiosk installed, before parking is built. Physical barriers should be installed to prevent inappropriate use, such as ORV use off of hardened trails. Existing rules should be considered, strengthened, and enforced. If DNR doesn’t have enforcement authority on lands outside Denali State Park, who does? How will you provide for enforcement?

(Denali Citizens Council, 9 individuals)

*Agency Response: The use of ORVs on general state land outside of Denali State Park is considered ‘generally allowed’ under 11 AAC 96.020. This regulation already provides restrictions on off-road vehicle use for resource protection. While the Division of Mining, Land and Water administers general state land, it has no enforcement authority. Alaska Statute, AS 38.04.200, further restricts the state from managing general state land so that traditional means of access for traditional activities is not restricted or prohibited for the purpose of protecting aesthetic values of the land or water. State of Alaska Department of Natural Resources and the Matanuska-Susitna Borough are also willing to work with user groups to design trails and keep motorized use on designated trails in areas such as wetlands that are susceptible to damage.*

*Additionally, the Final plan includes the following mitigation measures to reduce impacts from ORV use on natural resources in the South Denali region: 1)*

*measures would be taken at new and expanded trailheads and parking areas (including, but not limited to, Parks Highway MP 122) to control access and use during summer. For example, these areas could be gated in the summer to discourage ORV use in areas that attract winter recreation but may not be suitable for motorized summer recreation; 2) provide minimum-impact information targeted to ORV users at all new and existing trailheads and pullouts along the Parks Highway and Petersville Road (including the Forks Campground and Kroto Creek parking lot) where agency staff believe signage would be beneficial in protecting natural resources.*

### **Hill 1007/Chulitna River Trail**

33. The proposal to build a trail from the Chulitna Parks Highway Bridge (MP 132), parallel the west bank of the Chulitna to the mouth of the Tokositna River, and include a foot bridge or tram across the Tokositna is a poor choice for access to the national park, will significantly degrade the major game transit path along the west bank of the Chulitna and will increase bear-human encounters. The south bank of the Tokositna in the area of the proposed trail is essentially a broad riparian plain defined by the Tokositna River and a slough of the same river. It is a major bear area. In the summer moose use is sporadic, but they congregate there in the fall (October and November). It is a favorite spot for moose in the winter. It is also a high density area for bald eagles. Once on the beach (south bank of the Tokositna at the mouth) you can walk a defined distance to the point where the slough and creek re-enter the river, then you are blocked by an alder bluff (essentially not penetrable unless one had a very specific reason). Going westerly, you can travel about 1/2 mile fairly easily, then you also come to a dead end of alder, right at the foot of a private cabin. A trail to that beach would bring people right to the doorstep of that cabin. A bridge across the Tokositna still leaves travelers with only a few hundred yards of easy walking, then a long slog to the ridgeline that includes Alder Mountain. The terrain between the Tokositna and the Coffee River is now seldom traveled and not easy going on foot. There are a lot of bears in there. The view is not any different than from the Parks Highway directly opposite two miles to the east. Even with the best planning, this trail will habituate bears to humans, something that has not happened yet in this area.

(5 individuals)

*Agency Response: The interagency planning team removed this proposal from the preferred alternative (Alternative C) in the Final plan.*

34. Instead, how about a loop trail from the Chulitna Bridge area to the high point on the west bank of the Chulitna? That would be a good day hike. It would be about the right distance, wouldn't impact the mouth of the Tokositna area much, would eliminate issues with bears, would provide a nice view, and might even have a breeze to keep away the mosquitoes. Bet it would be cheaper too.

(1 individual)

*Agency Response: The interagency planning team appreciates this suggestion. The goal of the project is to provide expanded visitor and recreation opportunities in the South Denali region to a wide range of visitors. The Final plan provides an adequate range for the near term; however, this idea for a Chulitna River loop trail could add to the range of opportunities in the future.*

## **Wildlife**

35. It is important that the preferred alternative of the Final plan mandates adequate wildlife and biological inventories to garner baseline data in relation to critical habitat such as bear denning and feeding areas, moose wintering areas, and swan nesting areas. The plan must provide protection of important habitat areas and the establishment of other impact mitigation measures. A comprehensive inventory of wildlife in the park should be completed. Once completed, the plan must mitigate conflicts between construction, increased access, and the displacement of wildlife and critical habitat areas. Use patterns should be monitored in regards to vegetation and impacts on wintering wildlife and habitat. Facilities and trails should be kept away from these critical areas. Steps must also be taken to reduce negative wildlife-human encounters. A Final plan needs to thoroughly address these issues.

(Alaska Center for the Environment, Denali Citizens Council, Mat-Su Area State Parks Advisory Board, Talkeetna Community Council, Friends of Mat-Su, 15 individuals)

*Agency Response: Protecting natural resources, including wildlife, in Denali State Park is a goal of this plan. Mitigation measures to reduce impacts on wildlife are listed in the Mitigation section in Chapter Two. In an effort to reduce wildlife conflicts and displacement, the preferred alternative in the Final plan commits the agencies to conducting in-depth vegetation surveys and a bear habitat assessment prior to facility construction. This information would be used in the design and construction phase of this project to properly site facilities away from high conflict zones. The agencies would work together to establish a baseline monitoring program for the park to study the effects of development on park resources. The Alaska Department of Fish and Game, the agency responsible for wildlife management in the park, would be an integral part of the design and construction phase of this project to assure that the facilities are sited in such a fashion to minimize the long-term impacts of development on park resources. The Alaska Department of Fish and Game would also be an integral part of ecological monitoring after facilities are constructed. Wildlife education and interpretation would be provided at the visitor center, campgrounds, and trailheads to reduce negative wildlife-human encounters.*

36. Talkeetna Community Council has serious concerns with the thoroughness of the research and information regarding bear populations on Curry Ridge. Although twice mentioning that Shem Pete listed Curry Ridge as a place where the Denaina Indians went to hunt bears, the draft failed to address the high bear concentration there and the importance of that habitat. No specific research on Curry Ridge bear populations or habitats is mentioned. In fact, the plan equates the Curry Ridge wildlife situation

with that at the Peters Hills site. For both, it speaks of temporary displacement of wildlife during construction and minimal disturbance afterward.  
(Talkeetna Community Council)

*Agency Response: Impacts to wildlife, including bears, are evaluated in Chapter Four in the Wildlife section. The conclusion for the Parks Highway alternative indicates that while individuals could be affected in the Curry Ridge area, no significant population-level changes would occur. The Final plan recognizes that more information on bear populations and habitat is needed. Therefore, mitigation measures to reduce impacts on wildlife are listed in the Mitigation section in Chapter Two. In an effort to reduce wildlife conflicts and displacement, the preferred alternative in the Final plan commits the agencies to conducting in-depth vegetation surveys and a bear habitat assessment prior to facility construction. This information would be used in the design and construction phase of this project to properly site facilities away from high conflict zones. The agencies would work together to establish a baseline monitoring program for the park to study the effects of development on park resources. The Alaska Department of Fish and Game, the agency responsible for wildlife management in the park, would be an integral part of the design and construction phase of this project to assure that the facilities are sited in such a fashion to minimize the long-term impacts of development on park resources. The Alaska Department of Fish and Game would also be an integral part of ecological monitoring after facilities are constructed.*

37. Offer a bear viewing opportunity and watchable wildlife program at Byers Creek or Troublesome Creek. A well-managed program of boardwalks, and a controlled access viewing deck is a tangible, doable goal and would be a visionary approach to enhancing the future visitor experience of the area.  
(4 individuals)

*Agency Response: Interpretive materials on bears would be provided at trailheads in the state park; however, the agencies believe that there is not a reliable high concentration of bears at Byers or Troublesome Creek to warrant a designated viewing area with developed facilities.*

38. The plan's purpose is to provide a quality visitor experience while protecting resource values in the South Denali region. This proposed access road will provide access to snowmachiners and hunters resulting in harassment and the elimination of much of the wildlife on Curry and Kesugi ridges.

*Agency Response: Chapter Four evaluates impacts to wildlife. This section concludes that population-level impacts would not occur from actions proposed in this plan. Providing access to snowmachine users and hunters would enhance their experience, which, as the comment states, is a goal of this plan.*

39. Designate Denali State Park as its own Game Management Unit. Broaden no-hunting areas and enforce hunting regulations that exist now.  
(Denali Citizens Council, 3 individuals)

*Agency Response: All fish and game resources within Denali State Park are managed by the Alaska Department of Fish and Game. The Alaska Board of Game determines the delineation of game management units and sets hunting regulations. Any request for changes to hunting regulations or game management units must be made to the Board. The Denali State Park Master Plan Amendment continues to recommend that the state park be in its own game management subunit. Alaska Department of Natural Resources has no authority to make this change.*

*Current state park regulations prohibit the discharge of firearms within a quarter mile of the Parks Highway between Mile 132 and Mile 170, and within one-mile of a developed facility or the trail around the shoreline of Byers Lake.*

40. If the Lower Troublesome Creek Trail is upgraded for hand-carried boats, the launch should be located downstream of the mouth to prevent the disruption of critical habitat and users at the mouth. Trails along stream beds should be avoided. Efforts need to be made to reduce bear/human conflicts on trails and rivers.  
(4 individuals)

*Agency Response: The Denali State Park Master Plan Amendment commits to reducing the disruption to habitat and reducing wildlife conflicts with humans by recommending that Lower Troublesome Creek Trail be relocated out of the floodplain and that Upper Troublesome Creek Trail be relocated away from the stream bed. The preferred alternative of the Final plan specifies that the launch would be located downstream of the mouth of Troublesome Creek. Educational material about reducing conflicts with bears would be available at trailheads.*

41. The "easy loop trail" around the lake is a source of concern. My experience as a pilot has been that bears enjoy the hillside east of the creek that runs through the valley east of Lake 1787. If this is born out by ground observations, then maybe the trail should not go all the way around the lake, but should stay on the west side. Also, it should not go down by the creek as currently planned. The reason for both changes is because the human encroachment would drive the bears away from their feeding grounds. If it seems bear-safe to do so, perhaps the trail could continue southeast of the lake for another mile and a half to end at the waterfall at the boundary between section 26 and section 35. Education and the absolute prohibition of foodstuff on the trail would help. Electronic monitoring of bear movement would help.  
(1 individual)

*Agency Response: The Draft and Final plans and the Denali State Park Master Plan Amendment propose general locations for facilities. During the subsequent design and construction phase of this project, facility locations would be refined*



*and take wildlife considerations into account. The Alaska Department of Fish and Game, the agency responsible for wildlife management in the state park, would be an integral part of the design and construction phase to assure that the facilities are sited in such a fashion to minimize the long-term impacts of development on park resources. The Mitigation section in Chapter Two of the Final plan includes specific mitigation measures for bears. The list of mitigation measures includes food storage and education as suggested by the commenter.*

42. I highly recommend off-setting the displacement of bears that visitor facilities will have by more aggressively managing garbage and food storage in the park at all levels, from the hotels to backpackers, and to identify and protect prime bear feeding areas. All garbage needs to be stored in bear proof containers on public and private lands alike and hikers, including the backpackers, need to use bear proof food canisters or possibly electric fences. Private land along bear feeding streams such as Byers Creek should be bought back.  
(2 individuals)

*Agency Response: All garbage containers within Denali State Park are already bear-proof. Bear-proof food lockers are provided at Byers Lake campground and information on safe camping and food/garbage storage is provided at all park campgrounds. The Draft and Final plans and the Denali State Park Master Plan Amendment contain mitigation measures addressing bear-safe food storage and garbage management. These measures would be implemented as described and when appropriate throughout the region. The Amendment recommends relocation of the Troublesome Creek Trail in an effort to reduce human/bear conflicts and also recommends that inholdings along Byers Creek be acquired as they become available. The Amendment also recommends acquiring inholdings in a number of areas within the park. These recommendations will be implemented as staff and funding allow.*

### **National Environmental Policy Act Requirements**

43. It is not clear to me exactly who the “agencies” are or what “agency lands” refers to.  
(1 individual)

*Agency Response: Chapter Two of the Final plan clarifies that the term “agencies” refers to those entities that have entered into a formal partnership to write this South Denali Implementation Plan: State of Alaska, Matanuska-Susitna Borough, and National Park Service. It also clarifies that the term “agency land” refers to land managed by the aforementioned agencies.*

44. The plan doesn't offer a full range of alternatives. The Tokositna alternative was approved by a Record of Decision in 1997 after a multi-agency review of available sites and proposals to "provide opportunities for high quality, resource-based, destination experiences and provide information, orientation, and recreation services and facilities convenient to park visitors...develop facilities and access in a location and manner that



minimizes impacts on resources, local lifestyles, and communities..establish working partnerships for funding and phasing development as outlined in the concept plan."Nothing about the Tokositna alternative has changed since 1997 to make it less worthy for implementation, including costs or impacts to mining. Since no route was established to get to the Tokositna site, it not known whether there would be impacts to "significant wetlands," as the dismissal asserts. It is the only alternative that would actually bring the visitor to a site deep within the type of landscape protected within Denali National Park, and it would do it on land that the ANILCA Senate Report says was removed from National Park consideration and allowed to be conveyed to the State for the purpose of cooperative development at the site.

(1 individual)

*Agency Response: The planning team disagrees with the assertion that the Draft plan does not offer a reasonable range of alternatives. Reasons for dismissing the Tokositna alternative from further consideration under this planning process are provided in Chapter Two. The existing alternatives provide a reasonable range of locations and level of development, meet project goals, meet site selection criteria, and were developed with extensive public involvement.*

*While the 1997 South Side Development Concept Plan recommended development at Tokositna, the level of controversy was such that the governor-chartered 1999 South Denali Citizens Consultation Committee Final Report recommended modifying the development concepts while remaining consistent with its goals and objectives: to provide resident and visitor facilities throughout the south side of the Alaska Range to meet a wide range of needs and interests of the region's diverse user groups. The committee recommended that a visitor center be constructed along the Parks Highway and a nature center be constructed within the Denali State Park boundary in the Peters Hills to avoid an extensive upgrade of the Petersville Road through the canyon, thereby minimizing impacts to mining and backcountry uses. Based on the 1997 Record of Decision and with subsequent planning and environmental compliance, the Tokositna site could be developed in the future to offer visitors a quality visitor experience.*

45. The largest flaw I find with the plan is that it does not serve its primary goals: drawing pressure off the northern access to the national park, and providing access to the southern part of the national park. No data has been presented that demonstrates the public actually wants the type of facilities that have been proposed. I feel there is not enough "wow" factor to entice anyone to stop and stay longer than it takes to use the restroom. Neither Alternate B nor C offers wildlife viewing, one of the most hoped-for goals of visitors to Alaska. What is being offered that can't already be experienced in equal or grander fashion elsewhere along the Parks Highway? One of the original goals of the South Denali plan was to open access to the south side of the National Park. Neither alternative adequately addresses this, in my opinion. The visitor center should be sited in the central development zone rather than in the south end of the state park.

(3 individuals)

*Agency Response: The goal of this plan is not to “draw pressure off the northern access to the national park,” nor is it “to open access to the south side of the National Park.” As described in Chapter One of the Draft and Final plans, the goals of this plan are to provide a quality visitor experience while protecting resource values in Denali State Park; enhance recreational and access opportunities throughout the South Denali region for the benefit of a wide variety of visitors including Alaskans, independent travelers, and package tour travelers; and preserve the quality of life for residents in nearby communities. Opportunities to access the south side of the national park are provided by river systems, air taxis, and on foot for those who desire a high level of challenge and adventure. A constructed trail from the Peters Hills to the national park boundary was proposed in Alternative B. It was not included in the preferred alternative because the proposed trails closer to the Parks Highway and eastern end of the Petersville Road would receive more use and would be easier to maintain.*

*Site selection criteria required the site provide a destination experience and that it provide opportunities to view wildlife. Both action alternatives proposed in the Draft plan meet these criteria, and both action alternatives meet the project goals. Agencies believe that sites in the central development zone would not meet the goals of this project. Correspondence with individuals, businesses, organizations, and agencies throughout this planning process indicate support for developing new facilities in the South Denali region.*

46. The visitor center needs significant scaling back. Something more in keeping with the old Eielson visitor center or even the 5,900 square foot single visitor center. There is no justification for separate buildings.

(1 individual)

*Agency Response: The agencies believe that the proposed size of the visitor center in the preferred alternative would meet the goals of the project. One of the objectives of the visitor center is to provide a destination facility that can occupy visitors for up to a full day. A smaller facility would be unlikely to accomplish this, nor would it be able to meet the demand for increased growth and tourism in the South Denali region. The drawing of the visitor center is conceptual. The actual facility would consist of a single structure or multiple buildings. These details would be determined during the subsequent design phase of this project.*

47. There is not one member from the State Division of Mining on the planning team, and only one from the Division of Lands.

(Yentna Mining District)

*Agency Response: The agencies disagree with the implication that the team does not have appropriate representation. The planning team consists of two Matanuska-Susitna Borough planners, 1 Matanuska-Susitna Borough trails planner, 2 National Park Service planners, 4 representatives from State Parks including 2 from State Park’s Design and Construction section, 1 Department of*

*Transportation and Public Facilities planner, and 2 representatives from the State of Alaska Department of Natural Resources Division of Mining, Land, and Water. The Division of Mining, Land, and Water, which represents mining interests, is an active contributor to the core planning team and will continue to have equal opportunity to participate.*

48. For the most part, the effects of the footprints of the various proposals are not the problem; the problem is the effects that flow from the development of the facilities. Impacts are incompletely considered in the EIS and need to be more thoroughly examined. For example, a Boy Scout camp, with the possibility of hundreds of scouts using the park, will surely have impacts on the visitor experience. There is no mention of the indirect impacts, which cabin owners in the area will experience in winter from the increased parking included in the Petersville Road improvements. The EIS says nothing about the indirect impact, increased snowmachine traffic, which the improvements will bring to residents outside the community centers. The impacts of snowmachine noise and traffic on cabin owners at current levels is already substantial and seriously degrades their experience. The Final plan should consider the cumulative impacts of introduction of this much motorized winter (and summer) recreation into an area where there are a number of rural residents who value their quiet and who use trails for their own traditional activities. The plan does not address cumulative impacts of a growing number of visitors and residents. When the Draft plan and EIS notes cumulative impacts, the discussion is incomplete, non-specific, and narrow in range. The discussions of the existing situation regarding the effects of and conflicts created by motorized recreation, and of the possible or likely direct, indirect and cumulative effects of the proposed borough, state and federal facilities outlined in these documents are terribly understated and grossly inadequate. The Draft plan states nothing about the indirect impact which will result from more visitors to the Curry and Kesugi Ridges, to the soils, vegetation and wildlife, much less the recreational experiences of the hiker or backpacker.

(Denali Citizens Council, Alaska Center for the Environment, Alaska Quiet Rights Coalition, Friends of Mat-Su, 7 individuals)

*Agency Response: The Final plan incorporates this information into the impacts analysis by expanding the analysis of indirect impacts and cumulative impacts for soils, vegetation, wildlife, quality of life, and visitor opportunity. It takes into account impacts from increases in use of the area due to a new visitor center and related facilities. Impacts to cabin owners are addressed in the Socioeconomics section of Chapter Four under Quality of Life. Natural sounds, which seems to be of primary concern to cabin owners, is addressed as a component of the Quality of Life section and Visitor Opportunity section in Chapter Four. The agencies believe that the existing situation with respect to relationships between motorized and non-motorized users is described appropriately.*

49. The facility will, directly and indirectly, displace wildlife and impact their habitat. If the roughly 250,000 people expected to visit the facility each summer (which translates to approximately 2,700 people per day assuming a 90 day season) is reasonably accurate, the impact would be significant. (1 individual)

*Agency Response: The impacts analysis in Chapter Four concludes that while individuals may be displaced, impacts to populations are unlikely. Protecting natural resources, including wildlife, in Denali State Park is a goal of this plan. Mitigation measures to reduce impacts on wildlife are listed in the Mitigation section in Chapter Two. In an effort to reduce wildlife conflicts and displacement, the preferred alternative in the Final plan commits the agencies to conducting in-depth vegetation surveys and a bear habitat assessment prior to facility construction. This information would be used in the design and construction phase of this project to properly site facilities away from high conflict zones.*

50. High speed snowmachine travel has not only created safety problems, it has also made a mess of the local trails, many put in by local property owners, to the point where both skiing and snowmachining on them can be a very unpleasant experience. And of course much of the snowmachine travel in the area is off-trail, and there's hardly a lake, meadow or hillside that isn't extensively tracked up, turning beautiful, traditional snowscapes into ugly war-like zones. Snowmachiners travel through cabin owners' backyards. Snowmachine noise can be heard long after dark; finding peace and quiet in the area can be nearly impossible, since the noise can be heard for at least a mile or more away. The plan significantly underestimates the impacts and conflicts created by use from other parking areas and "jumping-off" points.

(2 individuals)

*Agency Response: The Final plan incorporates this information into the impacts analysis by expanding the analysis of impacts to visitor opportunity.*

51. The Final plan should recognize that there will be conflicts between motorized and non-motorized users on most of the trails that will be constructed outside Denali State Park, and on Curry and Kesugi ridges. This conflict will occur both in summer and winter.

(Denali Citizens Council, Alaska Center for the Environment, 3 individuals)

*Agency Response: The Final plan incorporates this information into the analysis of impacts to visitor opportunity.*

52. Page 4 of the Draft plan and EIS states "local residents report unacceptable impacts to their lifestyle that range from vandalism, trespass, litter, damage to natural resources, and public safety issues.....Actions proposed in this plan.....would manage use to protect natural and cultural resources and protect quality of life in local communities." Unfortunately, the Draft plan and EIS does not, in fact, provide for managed use, and it does not protect natural and cultural resources and the quality of life in local communities.

(1 individual)

*Agency Response: The purposes of this plan are to provide a quality visitor experience while protecting resource values in Denali State Park; enhance recreational and access opportunities throughout the South Denali region for the benefit of a wide variety of visitors including Alaskans, independent travelers, and*

*package tour travelers; and preserve the quality of life for residents in nearby communities. The agencies believe that this plan meets these goals. The agencies disagree that provisions in the Final plan do not protect natural and cultural resources and quality of life values in local communities. Impacts to these resources and values are evaluated in Chapter Four.*

53. The definitions of Minor, Moderate, and Major Impacts to Water Quality, Wetlands, Vegetation, and Wildlife are subjective and do not appear to be based on any scientific criteria.

(1 individual)

*Agency Response: The agencies believe that the impact definitions are adequate to distinguish between varying levels of impacts. Impact definitions are generally developed through consultation with resource specialists, pertinent literature and professional judgment, to provide a range of impact classes that are understandable to the lay public. The definitions (Minor to Major) describe the range of impacts and may be quantitative or qualitative in nature. The environmental analysis for any resource is then compared against the impact definitions and placed in the category that best describes the impact.*

54. The plan concludes that the preferred Alternative C would have a major impact on industry, employment, and income, and then a moderate impact on quality of life. But, it concludes that Alternative B would have a major impact on quality of life. Common sense alone tells you that both Alternative B and Alternative C will have a major impact on quality of life, and any model and/or qualitative analysis that predicts otherwise is flawed. (Talkeetna Community Council, 1 individual)

*Agency Response: The agencies disagree that the analysis is flawed. The conclusion of major for industry, employment, and income in Alternative C is a result of significant employment opportunities from new developments. Quality of life indicators include things like pace of life and recreation opportunities. No correlation has been made between increased employment and decreased quality of life.*

*The impacts analysis in the Final plan determines major impacts to quality of life in Alternatives B and C. Alternative B would have a major impact on quality of life indicators, particularly in Petersville and Trapper Creek; in fact, all indicators except self-sufficient lifestyle could be affected. Five quality of life indicators could be affected, though not all negatively, by developments proposed in Alternative C. These include rural character, community cohesiveness, economic characteristics, government interaction, and recreation opportunities.*

*Fewer quality of life indicators would be affected under Alternative C because development and high use nodes would be focused along the Parks Highway, away from the local communities. Alternative B would affect almost all of the*



*quality of life indicators because most of the traffic associated with new facilities in the Peters Hills would be routed through the community of Trapper Creek.*

55. There is no discussion as to how the recreational backpacking experience on Curry and Kesugi Ridges would be affected.  
(Alaska Quiet Rights Coalition)

*Agency Response: Impacts to recreational opportunities, including backpacking, are addressed in the impacts analysis in Chapter Four in the Visitor Opportunity section.*

56. The Assumptions section for Chapter 4 says that "Mining Activity in the Peters Hills would increase," even though all of the placer mining takes place beyond the land proposed for development actions in the alternatives and would not be affected by it. Miners stake placer claims where there is water and where there are lode outcrops; neither opportunity would increase in Alternative B by constructing a new 7 mile road to the top of a hill without gold-bearing creeks or ore-bearing outcrops.  
(1 individual)

*Agency Response: Relevant text in the Assumptions section in Chapter Four of the Final plan was amended as suggested.*

57. Alternative A assumptions does not address the increasing cross-country use of ORVs and the resultant damage to wetlands, scenery and quality of life.  
(1 individual)

*Agency Response: Language was added to the cumulative impacts sections of the analysis to address this concern.*

58. The council is also concerned that the plan does not adequately address the ecological impact of the business development that will occur as a result of Options B and C of the plan. Large numbers of travelers unavoidably generate needs that will be met by the infrastructure that precedes them and the businesses that follow them. All these factors can't help but cause impacts, both on the land and on the local residents.  
(Talkeetna Community Council)

*Agency Response: The agencies disagree with the implication that the analysis is inadequate. Impacts to soils, water resources, wetlands, vegetation, and wildlife are addressed in Chapter Four and include analysis of indirect impacts from increased use of the area. Impacts to quality of life values are evaluated in the Socioeconomics section. This section addresses impacts to rural character, pace of life, and economic characteristics that could be affected by a new visitor center and associated developments. The agencies also intend to work with communities to implement land use controls to control strip development (See Comment #7).*



59. On fragile Curry Ridge, address the impacts of increased trail use and the conflicts between motorized and non-motorized recreation as a priority before making this area more accessible to visitation. This proactive approach should precede all infrastructure development.

(1 individual)

*Agency Response: Impacts to motorized and non-motorized recreational opportunities are addressed in Chapter Four in the Visitor Opportunity section, and impacts to natural resources are also addressed in Chapter Four. Resolving conflicts between user groups and protecting resources on Curry Ridge will continue to be a priority for land and wildlife management agencies.*

60. The discussion about Peters Hills mining and impacts appears disconnected: Mining impacts to soils are minor in magnitude but "active and inactive placer gold mining areas are extensive in the Peters and Dutch Hills drainages..." (p. 118). Impacts to soils from a new 7 mile road for Alternative B would be moderate due to the potential for erosion and subsidence..." even while using BMPs. It is not clear why the impacts to soils from "extensive" placer mining and related access development are less than those for building a narrow road on a southfacing slope.

(1 individual)

*Agency Response: Language was amended in Chapter Four to address these concerns.*

61. "Water quality...could be impacted...as a byproduct of mining...activities (p.126), yet the conclusion here is that Alternative A "would not have any direct or indirect impacts on water quality..." Not only would increased mining impact water quality, but so would the anticipated increases in ORV use.

(1 individual)

*Agency Response: The conclusion for each alternative does not include cumulative impacts. A cumulative impact determination is made for each alternative in the section that precedes the conclusion. In this case, the conclusion of minor is accurate because pollution levels that would result from this alternative would be below water quality standards.*

62. The discussion on p. 135 regarding the effects of mining activity on Aquatic Resources and Fish only deals with the impacts from suction dredging and not from the use of heavy equipment on the "extensive" placer claims.

(1 individual)

*Agency Response: The following sentence that occurs on Page 135 of the Draft plan addresses impacts on aquatic resources and fish from placer mining activities: Placer gold mining can affect fish behavior, fish mortality, and habitat by damaging the substrate or smothering the fish eggs with sediment.*

63. The statement on Page 187 that there would be no direct or indirect impacts to quality of life from 20 more years of increased placer mining and unrestricted cross-country ORV use indicates that protection of scenery, natural soundscape, and other natural resources does not contribute to "quality of life."

(1 individual)

*Agency Response: The direct and indirect impacts from placer mining are addressed in the Draft and Final plans in the cumulative impact sections of the impacts analysis for soils, aquatic resources, wetlands, vegetation, quality of life, and visitor opportunity. The direct and indirect impacts from cross-country ORV use are addressed in the Draft and Final plans in the cumulative impacts and indirect impacts sections for soils, aquatic resources, wetlands, vegetation, quality of life, and visitor opportunity. Scenery and natural soundscape are components of visitor opportunity. Two quality of life indicators, rural character and recreation opportunity, also account for changes to these resources.*

64. "Visual resources would be negatively affected with a new access road and visitor facilities constructed in the currently undeveloped Peters Hills" (Page 193). This is not true: placer mining is development, the extensive road network to placer claims are also development. The next 20 years of additional placer mining and unrestricted ORV use will also negatively affect visual resources.

(1 individual)

*Agency Response: A change was made to the text in Chapter Four of the Final plan to address this concern.*

65. "Opportunities for undeveloped, dispersed recreation would decrease in the Peters Hills area" (Page 193). The same decrease in opportunity would occur over the next twenty years from increased placer mining development.

(1 individual)

*Agency Response: The agencies disagree with the assertion that the impact to opportunities for undeveloped recreation from mining operations would be comparable to impacts from constructing a new nature center and formal trail system that, in the medium growth scenario, is projected to attract more than a quarter of a million people to the Peters Hills every year.*

66. Analysis on Page 212 and 217 exaggerates impacts from development in the Peters Hills and downplays those from Alternative C. Alternative B states that "Increases in use would lead to user conflicts which could include collisions between...snowmachines and non-motorized winter recreationists on Petersville Road and on trail systems through the planning area." Alternative C states that "Visitor safety would be enhanced...because expanded visitor facilities in the south Denali region would increase opportunities for visitor education...Signing the entire winter trail system would also enhance user safety." Construction of a summer-only nature center and road in Alternative B would have no measurable impact on the growing activity of winter snowmachining in the area.

(1 individual)

*Agency Response: The agencies agree that constructing a summer-only nature center in the Peters Hills would not measurably impact snowmachine use in the Peters Hills. Other actions proposed in Alternative B, such as upgrading and creating new parking areas and trailheads, would likely increase both motorized and non-motorized use of the area. Conflicts between user groups are likely to occur under both action alternatives, and the analysis was expanded in the Final plan to clarify this. The agencies disagree that any bias exists in the analysis. Both Draft and Final plans mention positive and negative impacts to visitor safety from Alternative B and Alternative C. Both Draft and Final plans conclude that there would be both positive and negative impacts to recreation opportunities in Alternative B and Alternative C.*

67. The Yentna miners feel any major improvement to the Petersville Road would be a detriment for the mining community. All of the studies done to date lightly brush over the mining claims in the Cottonwood and Peters Creek area and say very little about the Dutch Hills and other mines in the planning area. We are concerned about vandalism to expensive equipment and to living quarters due to the influx of more people and better access to the area if the road is vastly improved.

(Yentna Mining District)

*Agency Response: Impacts to quality of life values are addressed in Chapter Four of this plan in the Socioeconomics section. All facilities proposed in this plan would be located away from all the mining areas that are mentioned in the comment. The preferred alternative proposes a minor upgrade to Petersville Road to the Forks. The alternative that included a major upgrade to Petersville Road to MP 28 was not selected as the preferred alternative.*

68. It should be noted that the closest fire departments are in Talkeetna and Willow, over an hour's response time away.

(1 individual)

*Agency Response: This information was added to Chapter Three of the Final plan.*

69. On Page 109 the description of the existing situation regarding skiing and snowshoeing says that these activities “occur at relatively low levels throughout the planning area.” There's a very good reason for this. Skiing and snowshoeing are not compatible with extensive snowmachining. The plan notes on Page 207 that “increased use and different types of uses in the same areas could create conflicts between users, as has been *widely demonstrated throughout the United States*” (my emphasis). Where there's lots of snowmachine use, there's little or no skiing and snowshoeing. Traditional non-motorized use has been displaced on the great majority of our public lands in Alaska by, ironically, the noisier, more powerful—and more harmful—motorized technologies.

(1 individual)

*Agency Response: Language was added to Chapter Three of the Final plan to more accurately characterize the existing condition.*

70. I feel that assigning the costs of upgrading Petersville Road to Alternate B is incorrect and misleading. Improvements to that corridor should be treated separately from either alternative.

(1 individual)

*Agency Response: Because implementation of Alternative B would be contingent upon an upgrade to Petersville Road (and because such an upgrade would not need to occur to support Alternative C), the cost of the upgrade was included in the cost analysis for Alternative B. The agencies believe that it would be misleading to exclude such significant costs from the analysis.*

71. In view of the still vague architectural structure of the visitor center, the Final EIS should stipulate that its construction be submitted to further compliance through an EA.

(Denali Citizens Council)

*Agency Response: Both the Draft and Final plans state that further compliance may be needed before development. Appendix C: Implementation Plan states that an EA would be needed before the visitor center would be constructed.*

72. Page 234 of the Draft plan reads, "The plan does not identify access for miners and business access to natural resource development." You want to use all of the roads, trails and ditchlines we have established, you went to all of this work to find these items, why did you not identify them as mining access? Also on Page 234 you have a list of trails. Why have you not identified them all, except one, as being mining access, as that is what they are?

(Yentna Mining District)

*Agency Response: The item identified on Page 234 of the Draft plan in Appendix A: Summary of Actions and Existing Plans that Apply to Public Lands Along the Petersville Road, is a summary of the Matanuska-Susitna Borough Trails Plan. It is provided here as a reference. Neither the Draft plan nor the Final plan proposes to restrict access for mining.*

73. Could you please provide in the bibliography the full citation to McKown 2004?

(1 individual)

*Agency Response: The citation was added to the bibliography in the Final plan. The full article referenced as McKown 2004 is available at <http://www.mountainbike.co.nz/politics/usa/conflicts/conflict3.html>*

## Soundscape

74. Today, quiet places are the exception, not the norm. We need not only to protect and maintain our few remaining quiet places, but restore the natural soundscape to large portions of our public lands from which it's been lost. Not only NPS, but State Parks as well, should treat the natural soundscape like any other resource deserving of protection, such as fish and wildlife, clean air and water, scenic beauty, etc. They should then in fact protect it, and monitor the effects of the proposed facilities and activities on it as well. Similarly, the effects of increased noise on quiet recreationists, private property owners, and others should also be monitored.

(Alaska Quiet Rights Coalition, 1 individual)

*Agency Response: The agencies agree that natural soundscape is an important resource and that impacts to natural soundscape would increase with the development of additional visitor facilities. In this EIS, impacts to soundscape are addressed as components of the Quality of Life section and Visitor Opportunity section in Chapter Four. Mitigation measures that could be included in the design phase or operational plan include defining trail corridors, designing facilities with visual and natural screening, and controlling campground/visitor center activity times. Monitoring soundscape in the South Denali region, including Denali State Park, could be done in the future.*

*Denali State Park offers many areas to enjoy natural quiet especially in areas with a "wilderness" land use designation. Facility development is planned for areas of the park designated "recreational development" where more intensive recreational use is expected. Park management prescriptions in the Amendment accommodate a variety of uses and offer a range of experiences for visitors.*

## Parks Highway

75. The Parks Highway handles most of the north-south traffic in this state. It is vital that the highway infrastructure be safe and adequate to deal with the increases specified in this plan. Avoiding a proliferation of driveways, and providing adequate turning and passing lanes are important from a safety standpoint. In addition, enforcement of traffic laws summer and winter will require increased staffing.

(Denali Citizens Council)

*Agency Response: Highway upgrades may be warranted at the entrance to the visitor center off the Parks Highway. Other portions of the Parks Highway corridor within the EIS planning area are listed on the ADOT&PF Transportation Needs & Priorities List. These road sections will be systematically funded through the Statewide Transportation and Improvements Program. Engineering criteria is used to determine the needs for passing lanes, turn pockets, and safety pullouts, and they would be evaluated during the design phase of the project. State Troopers and Park Rangers would determine needs for enforcement officials in the region.*

76. We recommend the turnout at MP 156.5 be moved as it is being used for tractor trailer parking, going to the bathroom, and littering.  
(2 individuals)

*Agency Response: Bathroom facilities are located at MP 163 (Denali View North) and bathroom/semi truck facilities are open year-round at MP 147 (Veterans Memorial). MP 156.5 is a trailhead for Ermine Hill connecting into the Kesugi Ridge Trail. It is plowed in the winter because it's a convenient wide spot for passing the plow equipment. Truckers use it in the winter because it's easy to stop. State Parks has plans to improve the turnout at MP 156.5 that will help alleviate these types of use concerns. The turnout has regular trash pick up and is slated to receive (summer accessible only) toilet facilities. State Parks will also work with design staff to improve the appearance and layout of the turnout to make it less attractive as a stop for long-haul truckers.*

### **Timber Harvest**

77. DNR and the MSB must regulate timber harvesting in the area. Large scale logging will have detrimental impacts on the tourist industry.  
(1 individual)

*Agency Response: State of Alaska Department of Natural Resources already regulates timber harvest in the area and screens any potential sale areas from the road in an effort to protect the viewshed. The agencies believe that timber harvesting would not impact tourism in the South Denali region unless visitors actually saw the logged areas. Current timber harvest operations are not adjacent to any of the facilities proposed in alternatives in this plan.*

### **Factual Corrections**

78. The document refers to land “to be purchased” (or similar language) by the Western Alaska Council of the Boy Scouts of America. At present the Western Alaska Council of the Boy Scouts of America owns approximately 2000 acres between the Chulitna and Susitna Rivers – corrections required on pages 115, 118, 125, 135, 144, 154, 197, 200, 217.  
(Western Alaska Council of the Boy Scouts of America)

*Agency Response: This factual correction was made throughout the document.*

79. Page 125 – The third “bullet” item regarding Western Alaska Council of the Boy Scouts of America land needs to be separated from the comments regarding mining in the Peters and Dutch Hills.  
(Western Alaska Council of the Boy Scouts of America)

*Agency Response: This factual correction was made throughout the document.*



80. The trail that crosses the proposed MP 28 access road to the nature center is not a 4x4 and bike trail as explained on your map. It was established years ago for access to the Bunco claims to bring in equipment and supplies and is still being used as such.  
(Yentna Mining District)

*Agency Response: The label on Figure 2-7 referring to the 4X4 and bike trail was deleted.*

81. The Petersville Road was constructed in the 1930s, not the 1980's as is mentioned in several places in the Draft Plan.  
(Yentna Mining District)

*Agency Response: This factual correction was made throughout the document.*

82. The statement on Page 211 about trails in the Peters Hills is not accurate. Snowmachine users ride on the Peters Hills and use it as a gateway to the Dutch Hills.  
(1 individual)

*Agency Response: The agencies agree that snowmachines are used in the Peters Hills. At certain times of the year, and in certain exposed areas, snow is blown free, making the area less desirable for snowmachine use. The statement on Page 211 of the Draft plan evaluates opportunities for snowmachine use in this area. In this context, no new opportunities for snowmachine use would be provided in the Peters Hills as a result of this plan; however, current opportunities would continue to exist. The quality of that experience depends largely on weather, wind, and snowpack. The text was changed to clarify this.*

83. The description of existing snowmachine use in the area should have appeared on Page 110 of the Draft plan.  
(1 individual)

*Agency Response: The text that was inadvertently removed from Page 110 of the Draft plan was recovered for the Final.*

