



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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July 17, 2026

Denali National Park and Preserve
Attention: Superintendent Brooke Merrell
P.O. Box 9
Denali Park, AK 99755

Submitted online at regulations.gov

Re: Vehicle Use: Denali National Park and Preserve, RIN 1024-AF11

Dear Ms. Merrell,

The State of Alaska (State) reviewed the proposed rule to amend special regulations for Denali National Park and Preserve (Denali) to clarify the number of vehicles that can travel on the restricted section (miles 15-90) of the Denali Park Road. The proposed rule would allow up to 160 vehicles, inclusive of National Park Service (NPS) official vehicles and tour buses, to travel on the restricted section of the road per 24-hour period during the visitor season and defines the dates of the visitor season. The State supports the sustainable management of park resources; however, we have concerns regarding the scientific justification for the strict 160-vehicle daily limit, its impact on Alaskan residents, statutory compliance with the Alaska National Interest Lands Conservation Act (ANILCA), and potential economic stagnation resulting from rigid vehicle caps. Given these concerns, **the State of Alaska opposes the proposed rule as drafted** because it lacks updated scientific justification, is inconsistent with statutory access requirements under ANILCA, and risks unnecessary limitations on inholder rights, subsistence activities, and public access.

The State reviewed the final Denali Park Road Final Vehicle Management Plan (VMP) and Environmental Impact Statement (EIS) in 2012 and submitted related comments most recently on July 30, 2012.¹ Concerns raised in that letter continue to be true, particularly as they relate to any potential impact to inholders, subsistence users, and hunters. We suggest that the NPS clearly state that access for these users will be maintained and that if adaptive management techniques need to be employed, these access rights will be protected.

The 2012 VMP set the vehicle limit "from traffic model simulation results and extensive scientific research on visitor preferences and resource condition."² It is unclear what further studies were completed to support the proposed daily limit - it appears the NPS did not complete the Before-After-Control Impact Study, or the critical five-year traffic and biological studies identified in the 2012 Denali Park VMP (ROD) to justify a fixed 160-vehicle daily limit.

¹ https://dnr.alaska.gov/commis/opmp/nilca/pdf/2012%20Letters/120730_DENA_FinalVMP_SOA.pdf

² Final VMP, page 56

Additionally, the State notes that the data used to set the limit is now over 15 years old, from a VMP that was only intended to cover 20 years.³ Visitor preference and resource condition data should be updated to current conditions.

A fixed 160-vehicle daily limit codified in permanent federal regulation seems to defeat the purpose of adaptive management and the intent to provide more flexibility in managing vehicle use on the park road. It is important that vehicle use limits could be increased in the future, if monitoring determines that increased use would not affect park resources or visitor experiences, and that any potential decreases would seek public input regarding the impact to visitors, inholders, and the tourism industry. Setting a fixed daily limit in regulation could result in an overly restrictive number that is unable to adapt to future conditions and needs. We request the fixed cap be replaced with the discretionary ability to adjust the daily limit.

The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

ANILCA Section 1110(b)

The land encompassing Denali also includes numerous inholdings of private property, including but not limited to those in the area of Kantishna. Access to these inholdings and any other private property within Denali is protected by Section 1110(b) of ANILCA (16 U.S.C. 3170), which provides that the Secretary **shall** “assure adequate and feasible access for economic and other purposes” within the Conservation System Unit. The assemblage of private and commercial property inholdings in Denali meets the criteria for access guaranteed under 1110(b) of ANILCA. Summer months are the only times when these properties are accessible by highway vehicle, and restrictions on access in this respect could greatly impact access and commercial activities.

The proposed rule includes no provisions to protect inholder access; providing inholder access is not discretionary, but a mandatory requirement under ANILCA. The proposed rule states that “any vehicle traveling on the park road counts toward the vehicle limit, not just vehicles operating under a permit,” explicitly looping inholder access and administrative vehicles into the 160-vehicle daily cap. As the State expressed in 2011 and 2012 letters, this approach violates both the spirit and letter of ANILCA.

The NPS should clearly and consistently describe implementation of 1110(b) access for inholders. The EIS that led to the current VMP indicated that the transit service would have priority when allocating vehicle use. The NPS should be clear and consistent that any transit priority for visitor services would still prioritize and protect the right of access afforded inholders by ANILCA 1110(b). We note the comment on page 5 of Appendix D of the Final VMP and EIS⁴, which states “There will also not be a specific allocation of the day-time traffic to concessioners and ‘other’ user groups. If visitor demand increases, management will use its toolbox to reduce other uses of the road in order to meet visitor demand, while still complying with the standards and the daily cap.”

³ 2012 NPS Denali Park Road Vehicle Management Plan Record of Decision, page 2.

⁴ <https://parkplanning.nps.gov/document.cfm?parkID=9&projectID=22494&documentID=48231> accessed 7/7/26

By including inholder traffic within the 160-vehicle daily limit, the NPS creates a zero-sum conflict between statutory inholder access and public recreation. On days when inholders transport visitors, equipment, supplies, or staff to exercise their property rights, public access capacity will be diminished. Inholder access is a statutory right under ANILCA and should be categorized separately from, and independent of, any recreational or administrative vehicle allocations to ensure adequate and feasible access for inholders and the public. We request the NPS clearly reflect that 1110(b) access will be exempt from the transit priority.

Subsistence Access

Providing subsistence access is not discretionary—but a requirement under ANILCA for rural residents—this commitment must remain clear and operationally reliable. The State recommends that NPS confirm access for subsistence access. The Record of Decision (RoD) for the VMP⁵ states, “The National Park Service will continue to provide reasonable access for subsistence activities in the Kantishna area under this plan.” (RoD, page 20). However, as noted above for inholder access, the transit priority and other vehicle restrictions could affect when hunters would be allowed to travel on the Park Road. If vehicle use approaches the proposed daily limit, subsistence users’ access should not be restricted by the transit priority.

Codifying the 160-Vehicle Daily Limit

The proposed rule transitions from an annual seasonal limit to a hard cap of 160 vehicles per 24-hour period, asserting this is necessary to protect wildlife and the visitor experience. However, the data from the 2012 Vehicle Management Plan supporting a strict 160-vehicle limit as a biological threshold for wildlife protection is outdated, unsubstantiated, and appears arbitrary. The proposed daily cap is only 13 vehicles higher than the number of daytime vehicles (6am to 10pm) identified in the traffic scenario used in the 2012 Record of Decision (ROD). We are concerned that codifying the daily vehicle limit eliminates the adaptive management toolbox the ROD identified to support the selection of this alternative. The ROD identified continuing traffic studies at five-year increments to verify the appropriateness of the 160 vehicle limit before any cap was locked in. NPS has failed to provide the updated, long-term biological data required by its own ROD to justify this permanent restriction.

The State notes that the first 15 miles of the Denali Park Road (from the park entrance to the Savage River) are open to unlimited, unregulated private vehicle traffic during the visitor season. Despite high volumes of private and commercial traffic on this unrestricted segment, ADF&G management plans do not identify negative impacts on wildlife populations or movement along this corridor as a management problem or need. Wildlife routinely utilizes and crosses the first 15 miles of the road. NPS has not provided compelling biological data demonstrating that an increase beyond 160 vehicles on the restricted portion (Miles 15–90) would cause detrimental impacts to wildlife populations.

Alaskan Residents and Public Access

Denali National Park and Preserve vehicle access is uniquely restrictive compared with other units in the National Park System with similar visitation. Other parks that operate bus systems –

⁵ <https://parkplanning.nps.gov/document.cfm?parkID=9&projectID=22494&documentID=51427> accessed 7/7/26

such as Yosemite, Grand Canyon, and Zion – experience visitation levels an order of magnitude higher. These Parks all receive over 4 million annual visitors while Denali receives approximately 600K visitors. Other national parks with bus services also provide complimentary shuttle systems instead of the Denali fee-based system forcing Alaskans to rely almost exclusively on expensive and regimented bus systems.

The current structure requiring visitors to ride the bus already alienates many local Alaskans who wish to visit their public lands. The State urges the NPS to consider alternatives within future vehicle management planning that allocate dedicated opportunities for Alaska residents to access the restricted road corridor via personal vehicles. Providing resident-specific weekend permits or vehicle lotteries would restore a sense of stewardship and access for Alaskans without compromising orderly road management.

Failure to Adapt to Economic and Population Growth

National parks are intended to serve as vital economic engines for their host states and local gateway communities. However, the overall framework governing vehicle limits in Denali was conceived decades ago in the 1980s and has failed to adapt.

Since the vehicle restrictions were first envisioned, both the population of Alaska and global tourism visitation have grown significantly. Codifying a rigid 160-vehicle daily limit locks Denali into an outdated management paradigm that could suppress the regional economy. We encourage the NPS to complete the following monitoring identified in the ROD prior to initiating the next adaptive management plan:

- With the implementation of this alternative the number of vehicles, their schedules, and behavior will be managed to meet visitor demand while maintaining standards for desired resource conditions and visitor experience. Several times each season, key indicators will be monitored to assess the success of current traffic levels, behavior and patterns to determine whether the set standards are being met.⁶
- Comprehensive monitoring will also be conducted at regular intervals to specifically address the impacts of traffic on wildlife, wilderness, and the visitor experience. A Before-After Control Impact (BACI) study will be conducted within the first five years of the plan's implementation to affirm the selection of key indicators and to distinguish impacts due to changes in current traffic patterns and traffic levels. Data from long-term inventory and monitoring programs may also be used to evaluate whether changes in the resource condition are occurring.⁷

Private Day Tours

The State continues to assert the NPS needs to also recognize ANILCA Section 1110(b) ensures inholders "...rights as may be necessary for adequate and feasible access for economic and other purposes..." and provide for potential future access needs for inholders. While the NPS's current position is that day tours are not provided for under ANILCA Section 1110(b), the State objects to this interpretation. The Service has openly accommodated this use for many years demonstrating that these uses have been consistently treated as part of the practical access

⁶ 2012 NPS Denali Park Road Vehicle Management Plan Record of Decision, page 3

⁷ 2012 NPS Denali Park Road Vehicle Management Plan Record of Decision, page 3

framework in Denali. These day tour activities are currently being operated through commercial use authorizations, and potential vehicle restrictions could significantly impact the economic opportunities of inholders in the Kantishna area.

Teklanika River Campground Vehicles

The ROD for the VMP noted that, “If needed to meet standards, private vehicles driving to and from Teklanika River Campground will travel on the Park Road during periods of low traffic volume.” Since travel may be limited to low traffic volume periods, we recommend that information regarding private vehicle access to Teklanika River Campground be available to the public well in advance of the summer season to assist the public in planning their visit; this timing restriction is not currently clearly stated on the Park website for Teklanika Campground access information.⁸

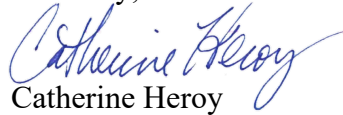
Closing

Thank you for the opportunity to review and comment on this proposed rule amending Park Road management. For the reasons outlined above, continuing to implement the current adaptive management framework is the appropriate approach to handle vehicle access in Denali. If the NPS moves forward with the proposed rule, the State requests inclusion of the following:

- Exempt ANILCA Section 1110(a) and 1110(b) inholder access as well as subsistence users entirely from vehicle daily caps.
- Honor the 2012 ROD commitment to adaptive management and five-year studies. Future adaptive management and planning efforts aimed at identifying capacity limits should provide scientific validation by comparing wildlife population impacts along the unrestricted 15-mile road segment with those in the restricted corridor. This comparison is needed to justify any threshold, including increasing the vehicle threshold when supported by data.
- Incorporate specific personal vehicle access opportunities reserved for Alaska residents.
- Build adaptive flexibility into the rule to allow for future economic and visitation growth rather than a rigid cap.

The State continues to support protection of access for inholders, subsistence users, hunters, and local Alaskan residents and encourages the NPS to provide flexibility to road management. We look forward to working collaboratively with the NPS to ensure that Denali remains accessible to the public while protecting the fish and wildlife resources that make the park iconic. Please contact me at (907)269-0880 or by email at catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,



Catherine Heroy
Federal Program Manager

⁸ <https://www.nps.gov/dena/planyourvisit/campground-tek.htm#access> accessed 7/8/26