



Pacific PEER

Public Employees for Environmental Responsibility

October 28, 2019

Denali Superintendent
Attn: Kantishna Plan
PO Box 9
Denali Park, AK 99755

Re: Comments on Wonder Lake and Kantishna Area Plan

These comments are submitted on behalf of Public Employees for Environmental Responsibility (PEER). For reasons outlined below, PEER urges the Superintendent of the Denali National Park and Preserve (Denali) and the National Park Service (NPS) to withdraw this Wonder Lake and Kantishna Area Plan and reconsider any further steps toward “developing” this area.

The aptly named Wonder Lake is often referred to as the Crown Jewel of Denali. This plan, however, threatens to tarnish this gem and significantly alter one of the most pristine and compelling places in the national park system.

Our specific concerns about this plan include the following:

I. Plan Would Significantly Degrade Wonder Lake

The plan describes a wide-ranging array of construction projects, all of which are contemplated within the ambit of this plan. The plan cites development to accommodate projects, including –

- A “trail system could include up to 80 miles of trails” many miles of which would be entirely new:
- “A walk-in/bike-in roadside campground with up to 10 sites” plus “backcountry campsites (no more than five locations with 3 tent pads each) would have food storage, outhouse, and cooking and eating areas...In addition to, or instead of, a campground in Kantishna, NPS is considering offering group camping and additional campsites for independent use at the Wonder Lake Campground.”
- “The Brooker and Taylor Loops would include pedestrian bridges to allow visitors to cross Moose Creek. Up to two backcountry campsites, sleeping up to 12 people, could exist on the Brooker Loop, and up to three backcountry campsites, sleeping up to 12 people, could exist on the Taylor Loop.”
- “Pedestrian bridges at Eldorado and the airstrip could provide a bicycle and handicap accessible loop, or a hand tram could be installed on one end to encourage out and back bicycle use of the trail, instead of potentially unsafe bicycle use on the Park Road.”
- “Bike use would be encouraged generally with parking and storage options provided at visitor nodes.”



Pacific PEER

Public Employees for Environmental Responsibility

- “A shuttle system would operate between Kantishna and the Eielson Visitor Center... Potential transportation infrastructure includes bus depot(s), trailheads and parking, end of the road loop relocation, facilities and utilities to support a shuttle system.”
- “Administrative facilities would be consolidated about a mile up the Moose Creek access route on an approximately 10acre site. This would include housing for NPS, concessions staff, and researchers, and office space and maintenance facilities... The administrative facilities at the Wonder Lake Campground would be repurposed as a group camping site.”
- “A hostel could support independent and commercial groups and most likely be co-located with the campground if it is constructed in Kantishna.”
- “The Kantishna Airstrip could be designated as a portal to more appropriately manage existing use levels. An annual average of 219 roundtrips was taken by commercial operators from 2013–2018 (Maki, 2019vi). This could increase if additional lodging is provided or the park promotes air access.”

The plan declares that “The purpose of this project is to provide additional recreational opportunities” but appears to place maximizing recreation over all other values.

In passing, the plan does concede that –

“Construction of the Washburn Trail and Brooker Loop would degrade wilderness character. Portals increase access to a specific management zone but sound impacts degrades [sic] the natural character of the surrounding wilderness.”

These small concessions of adverse impacts are a major understatement of the negative effects on the wilderness character of Wonder Lake.

II. Plan Ignores Adverse Impacts on Wildlife

The plan is contradictory with respect to its adverse impacts on wildlife. On one hand, it declares that “Sensitive wildlife habitat is protected. Wildlife remains free from the influence of humans, and there are few negative human-wildlife interactions.”

But on the other hand, it mentions undeniable negative impacts, such as –

- “New trails and developed camping could disturb wildlife and bird behavior.”
- “Constructing a trail, encouraging predictable routines, and an accumulation of smells could attract wildlife to an area.”



Pacific PEER

Public Employees for Environmental Responsibility

- “Trails increase the number of bear-human interactions as bears like to travel on trails and humans are less vigilant when hiking on a trail.”
- “Designating campsites and trails, and encouraging bike use may increase negative human-wildlife interactions.”
- “Any new development from the Park Road could increase the spread of exotic species into new areas of the park.”
- “Additional use on Quigley and Friday ridges could increase probability of trampling and destroying sensitive lichen and other rare plant populations.”
- “Encouraging visitor use of the area could result in the need for increased transportation, while the NPS is already exceeding the number of vehicles on the Park Road.”

Moreover, current Denali visitation is already having adverse effects on wildlife which this plan would only aggravate. As the plan admits in a footnote –

“The data showing that the park is out of standard with natural sounds disturbance comes from preliminary results of the NPS managed Day Hiker User Survey completed in 2018. Management guidance says no more than 10 natural sound disturbances should occur in eligible wilderness. Approximately 10% of hikers said they heard motorized noise more than 10 times. The threshold is set at no more than one motorized noise event in designated wilderness. Nearly half of all surveyed day hikers said they heard noise two or more times.”

Thus, by increasing recreational capacity as described, the plan will likely create significant new adverse impacts on nearby flora and fauna. Through additional noise, heavier volumes of mechanized traffic, far greater likelihood of human-wildlife interaction, trampling sensitive plants, the disruption of construction and maintenance, plus the much-expanded development footprint, this plan is at odds with its stated aim of minimizing disruption of park wildlife.

III. Plan Would Primarily Benefit Private Inholdings

The plan opens with this observation:

“There is new private development in the Kantishna area, which may increase the number of visitors spending multiple days in the area. Expanding guided services to both independent visitors and lodge guests may increase the number of visitors attracted to the area.” (page 2)



Pacific PEER

Public Employees for Environmental Responsibility

It appears that many of the projects are designed to benefit the occupants of these private inholding and their guests. Further, the plan expresses an interest in facilitating the creation of commercial opportunities for what it terms “independent and commercial users.”

This investment of public funds to benefit private interests is inappropriate.

Further, Denali’s General Management Plan recommends that NPS purchase private inholdings in Kantishna to reduce commercial growth in the area. The Park has not followed this recommendation. The plan notes that “The NPS has not pursued or received funding to do this since the early 1990s...”

Yet, the Park claims to have funding to undertake construction and maintenance of new facilities that will be available to, and serve some benefit for, these private property owners. In addition, Denali’s investment in this plan will arguably increase the real estate value of the private inholdings, making government purchase of these inholdings even more unlikely.

IV. Serious Water Quality Concerns Unaddressed

The plan points out that –

“High levels of arsenic and antimony naturally occur in Kantishna soils and waters, making water sources undesirable for long-term consumption and needing mitigation for soil compaction... Water sources are unreliable enough in the Kantishna Hills that visitors cannot rely upon them.” (page 6)

“Unhealthy exposure to water and soil contamination from mining activities and naturally occurring heavy metals is a concern for individuals spending many seasons in the area. Water contamination is not a concern for visitors in the area for short periods. The health and safety impacts of heavy metal presence in the soil are unknown.” (page 7)

Yet, the plan is designed to allow visitors “to explore for four full days (five nights) on day use trails, as well as five or more nights at designated backcountry campsites” but does not explain where these multi-day visitors will obtain potable water.

V. Wetlands Impacts Unaddressed

Page 96 of the plan contains the following curious statement:

“New trails may damage wetlands, but required mitigation could fund stream reclamation projects.”

The plan projects more than 50 miles of new trails and broadening of miles of current trails. Given the proposed trails’ proximity to lakes, streams, and other waterbodies, the amount of destruction to wetlands will be considerable.



Pacific PEER

Public Employees for Environmental Responsibility

This lone reference to the issue in the plan does not explain what mitigation measures will be required and how much that will cost.

In addition, it ignores Denali's shrinking base of wetlands. Wetlands occupy almost half of Alaska, including much of the state's public lands and park units. These wetlands are important wildlife habitats. However, climate change is threatening the hydrologic support for these vital areas.

In short, the wetlands impacts are a subject that Denali should consider in some detail, rather than merely in passing.

VI. Plan Does Not Match Visitation

The plan is all about recreation but admits in its "Purpose and Need" page that "future demand for the use of the area is ultimately unknown."

It elaborates that "The park has experienced an 11% growth in park visits between 2013 and 2018 (citation omitted). An estimated 11,000 of the approximately 600,000 park visits are hikes on formal or informal trails in the Kantishna and Wonder Lake areas."

Nowhere does the plan state that current recreational opportunities or facilities are inadequate to accommodate present usage. If Denali's 11% growth in visitation is projected forward for the next five years, the increase in new visitors to the Kantishna and Wonder Lake areas would only be approximately 1,200 more visitors by the year 2023.

Yet, the scope of the plan suggests an assumption about visitation growth that is far larger than the current trend. However, the growth assumption Denali is employing to support this plan is never spelled out. Further, it is not clear that building all these new trails, campgrounds, transportation infrastructure, etc. will attract higher levels of visitation than the current trend. Denali planning should not be based on a Field of Dreams mentality that "if we build it, they will come."

Given limited resources, NPS and Denali should scale back planning to reflect reasonably foreseen usage.

VII. Plan Aggravates Already Large Maintenance Backlog

The NPS is currently addressing a nearly \$12 billion deferred maintenance backlog. According to the latest NPS report on this subject (September 2018), Denali currently has a maintenance backlog of \$51,784,800.

While the plan acknowledges that the NPS may not have the means to construct or adequately maintain new infrastructure in Denali, it makes no financial estimates for these new facilities.



Pacific PEER

Public Employees for Environmental Responsibility

Further, the plan does not spell out what the new annual costs for maintenance would be for these new facilities, such as 80 miles of trails.

The plan also points out that the current “informal trails network has developed with varying degrees of erosion from improperly aligned unsustainably created trails” yet identifies no action or funding to address this deferred maintenance need.

Since Denali already has a maintenance backlog in excess of \$50million, the prudence of adding to that backlog seems questionable. PEER urges Denali leadership to prioritize repairing its existing facilities before building new ones.

VIII. Plan Entails Major Staff Expansion

In addition to additional maintenance expenses, the plan would require increased operational expenses, much of it in the form of new staff. The plan describes building sleeping quarters for –

- 20 staff;
- 4 bus drivers;
- Trails camp for youth and volunteer crews; and
- Transient housing with up to 26 beds, kitchen, bathing, laundry facilities (8 trails, 6 fire, 12 resources or researchers).

All told, the plan contemplates housing more than 50 new staff or contract positions. This expansion is at odds with the declining staff levels throughout the NPS, which has lost more than 4,000 FTE (full-time-equivalent) slots since FY2010, approximately a one-fifth shrinkage of systemwide workforce.

The plan would seem to have Denali swimming upstream against this powerful downsizing current. Nor does the plan identify a funding source for any additional staff.

For the foregoing reasons, PEER urges Denali to withdraw this plan and rethink the range of options available to it.

Sincerely,

Jeff Ruch
Pacific Director
Public Employees for Environmental Responsibility (PEER)