

Chapter 6: Public Comments and Response

CHARACTERIZATION OF COMMENTS RECEIVED

National Park Service staff at Denali National Park and Preserve received comments from 15,198 individuals, organizations, and agencies on the *Revised Draft Backcountry Management Plan*. This total includes both written comments and verbal comments made during five public hearings held in Anchorage, upper Susitna Valley (Talkeetna/Trapper Creek), Cantwell, Healy, and Fairbanks. Comments were received from agencies, organizations, and individuals. Comments from individuals included verbal testimony, personally written letters or e-mail messages, and form letters originated by organizations and signed by members or supporters. The number of comments received from each source is as follows:

Agencies	4
Organizations	21
Individuals	15,173
<i>Public Hearing Testimony</i>	<i>13</i>
<i>Non-Form Comments</i>	<i>469</i>
<i>Form Letters</i>	<i>14,691</i>
TOTAL Comments	15,198

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.

Individual Comments

Comments were submitted from every state in the United States, plus the District of Columbia, two U.S. territories, and 15 foreign countries.

Local	76
Alaska	178
United States	14,811
International	64
Unknown	44

“Local” includes residence addresses between Willow and Nenana along the Parks Highway and its spur roads as well as the Bush communities of Lake Minchumina, Telida, Nikolai, and Skwentna. “Alaska” includes all other addresses in the State of Alaska excluding those covered under “Local.” “United States” includes all residence

addresses within the U.S. and its territories excluding Alaska. “International” includes all residence addresses outside the U.S. “Unknown” identifies those letters for which an address is not known, generally because the individuals sent an e-mail message and did not include address information.

Most individuals 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 by the location of residence address are indicated in the table below.

	No Alt Selected	1	2	3	4	5	People for Parks
Local	22	1	42	0	2	0	9
Alaska	34	0	18	1	6	0	119
United States	131	0	17	4	2	0	14,657
International	0	0	1	0	0	0	63
Unknown	22	0	7	0	0	0	15
TOTAL INDIV COMMENTS	209	1	85	5	10	0	14,863

Of those 209 individuals who did not indicate a preference for a particular alternative, 166 individuals asked the NPS to protect wilderness character. Most of these comments specifically asked the NPS to ban or restrict snowmachine use and aircraft landings and/or aircraft overflights. Other common requests from these comment letters included protection of wildlife and natural soundscapes, designation of Wilderness, and excluding recreational snowmachine use from the definition of “traditional activities.” Twenty-four individuals asked the NPS not restrict aircraft landings or ban flightseeing in the park.

All of the 14,691 form letters, plus 172 of the non-form letters, supported the People for Parks Alternative, which is described below.

Organizations

Twenty-one organizations submitted detailed comments covering the entire range of issues covered in the plan. Most indicated an alternative preferred by that organization, although almost all suggested considerable modifications. The organization and these general preferences are indicated below.

	Organization	Preferred Alternative
1	Aircraft Owners and Pilots Association	5 for aviation
2	Alaska Airmen's Association	5
3	Alaska Center for the Environment	People for Parks
4	Alaska Quiet Rights Coalition	People for Parks
5	Alaska Outdoor Access Alliance, Alaska Outdoor Council	1
6	Alaska Professional Hunters Association	5 for guided services
7	Alaska Travel Industry Association	4
8	American Alpine Club	3
9	Bluewater Network	People for Parks
10	Californians for Western Wilderness	People for Parks
11	Denali Citizens Council	Elements of 2/3/People for Parks
12	Fairbanks Convention and Visitors Bureau	No preference – provided information on the visitor industry
13	Great Old Broads for Wilderness	People for Parks
14	International Snowmobile Manufacturers Association	5
15	National Parks Conservation Association	People for Parks
16	Natural Resources Defense Council	People for Parks
17	Northern Alaska Environmental Center	People for Parks
18	The Ecotopian Society	People for Parks
19	The Wilderness Society	People for Parks
20	Trustees for Alaska	People for Parks
21	Wilderness Watch – Alaska	Oppose preferred – supports use limits to protect wilderness resource values

A coalition of conservation organizations advanced the People for Parks Alternative. The main tenets of this alternative were the following:

- Use the precautionary principle to protect park resources before resource impacts occur
- Emphasize a quality visitor experience that includes intangible values
- Determine funding and details for the monitoring program before adoption of the plan
- Extend the definition of “traditional activities” used for the Old Park to the park additions and do not authorize recreational snowmobiling
- Complete the wilderness recommendation to Congress.

This alternative also requested restrictions on commercial scenic air tours similar to those proposed in Alternative 4, but excluding the Pika and Eldridge Glaciers from all scenic air tour landings.

Agencies

In addition to the comments from individuals and organizations, the National Park Service received comments from the State of Alaska, the U.S. Environmental Protection Agency (EPA), the U.S. Air Force, and the Denali Subsistence Resource Commission.

The State of Alaska letter provided detailed comments on various issues, but its principle concern was whether the National Park Service sought to manage areas outside of the Old Park “as wilderness.” The letter objected to State of Alaska actions being subject to the “minimum requirement/minimum tool” analysis outside of designated wilderness.

The U.S. EPA expressed concern about environmental impacts from snowmachine use and trail construction, and about the park’s ability to monitor indicators proposed in the plan. It did not express a preference for a particular alternative.

The U.S. Air Force comment asked the National Park Service to correct factual data concerning the Susitna Military Operations Area. The Air Force did not express a preference for a particular alternative.

The Denali Subsistence Resource Commission considered the plan at its meeting on June 28, 2005, and passed three motions concerning the need for subsistence uses to be given a higher priority in planning. The Commission also asked that the National Park Service better identify how it will address conflicts between subsistence and recreational uses.

These letters and the motions of the Subsistence Resource Commission appear in their entirety below.

RESPONSE TO COMMENTS

Following are letters containing substantive public comments and the National Park Service response to those comments. Because of the large numbers of comments on this plan, only a representative sample can be published here. Included are all of the agency comments, substantive comments from organizations, and individual comments that introduce additional substantive issues. Collectively, this group of letters encompasses the entire range of substantive comments made on the *Revised Draft EIS*.

According to Director’s Order #12 Handbook, substantive comments are defined as those that do one or more of the following:

- a) question, with reasonable basis, the accuracy of information in the EIS
- b) question, with reasonable basis, the adequacy of environmental analysis

- c) present reasonable alternatives other than those presented in the EIS
- d) cause changes or revisions in the proposal.

In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

In the letters below, the substantive comments are bracketed and identified by a number for each letter. The response appears on the opposite side of the page, identified by the letter and number. Some responses are cross-referenced, but can be located using the following index. In the text, letters from agencies are published first, followed by letters from organizations and then letters from individuals or businesses.

Abbrev.	Letter	Page #
AAA	Alaska Airmen's Association	210
AAC	American Alpine Club	222
AOC	Alaska Outdoor Council	212
AOPA	Aircraft Owners and Pilots Association	207
AQRC	Alaska Quiet Rights Coalition	217
AT	Air Taxi concessionaires	303
AWA	Alaska Wildland Adventures	309
APHA	Alaska Professional Hunters Association	215
BN	Bluewater Network	234
DAJV	Doyon/Aramark Joint Venture	333
DCC	Denali Citizens Council/Northern Alaska Environmental Center	238
DNPWC	Denali National Park Wilderness Centers	325
EPA	Environmental Protection Agency	184
ISMA	International Snowmobile Manufacturers Association	263
K2	K2 Aviation	338
NPCA	National Parks Conservation Association	268
PfP	People for Parks	203
SoA	State of Alaska	189
SRC	Denali Subsistence Resource Commission	200
TWS	The Wilderness Society/Alaska Center for the Environment/Natural Resources Defense Council/Alaska Chapter Sierra Club	286
USAF	United States Air Force	201

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